

2018

Wausau School District Hazard Communication Plan

Wausau School District

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I. PURPOSE

The purpose of this Written Hazard Communication program is to ensure that:

1. Hazardous substances present in the work place are properly identified and labeled.
2. Employees have access to information on the hazards these substances pose.
3. Employees are provided with information on how to prevent injuries or illnesses due to exposure to these substances.
4. Identify by job title who has the responsibility for maintaining the program, SDS's, conduct training, etc.

Note: This program will be available to all employees for review and a copy will be located on the District's website.

II. AUTHORITY AND REFERENCE

Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1200

Dept. of Safety and Professional Services (Chapter 332) (DSPS) 332.15

III. HAZARD DETERMINATION

- A. A "hazardous substance" is a physical or health hazard that is listed as such:
1. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration. (See OSHA website or OSHA manual for details)
 2. *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment* (latest edition), American Conference of Governmental Industrial Hygienists (ACGIH).
- B. A "hazardous substance" is regarded as a carcinogen or potential carcinogen if it is identified as such by:
1. National Toxicology Program (NTP), *Annual Report on Carcinogens* (latest edition).
 2. International Agency for Research on Cancer (IARC) *Monographs* (latest edition).
 3. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration.
- C. Manufacturers, importers and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell.

- D. The following materials are not covered by the Hazard Communication Standard:
1. Any hazardous waste as defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC 6901 et seq.) when subject to regulations issued under that act by the Environmental Protection Agency.
 2. Tobacco products.
 3. Wood products. **Note:** Wood dust or wood treated with a hazardous chemical s are not exempt since the hazards of wood dust are not self-evident.
 4. Consumer products (including pens, pencils, adhesive tape) used in the work place under typical consumer usage.
 5. Articles (i.e. plastic chairs).
 6. Foods, drugs, or cosmetics intended for personal consumption by employees while in the work place.
 7. Foods, drugs, cosmetics, or alcoholic beverages in retail stores packaged for retail sale.
 8. Any drug in solid form used for direct administration to the patient (i.e. tablets or pills).

IV. SCOPE AND APPLICATION

This program applies to the use of any hazardous substance which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

V. RESPONSIBILITY FOR COMPLIANCE

- A. The administration of this program will be the responsibility of the Director of Pupil Services or his/her designee. The administrative responsibilities of this individual/position will include:
1. Identification of the employees to be included in the Hazard Communication Program.
 2. Development and maintenance of a hazardous substance master inventory list.
 3. Coordination and supervision of employee training.
 4. Coordination and supervision of the facility's container labeling program.
 5. Coordination of any necessary exposure monitoring.

6. Coordination and supervision of required recordkeeping.
 7. Periodic evaluation of the overall program.
 8. Obtaining and updating SDS's.
- B. Employees are responsible for following all safe work practices and using proper precautions required by the guidelines in this program.


VI. HAZARDOUS SUBSTANCE INVENTORY LIST

- A. Each department head is responsible for compiling, maintaining, and updating a master list of hazardous substances used or produced in areas under their authority. The inventory list will include the common identity or trade name of the product. The name and address of the manufacturer shall be kept up to date. Hazardous substances will be listed alphabetically by manufacturer. The master list shall identify the work areas where the chemicals are used or stored and when the chemicals are removed (or used up) from the facility. Substances which are not in containers will also be included on the inventory list, e.g., welding fumes, carbon monoxide from a fork lift, etc.

VII. LABELING

- A. Each department head is responsible for evaluating labels on incoming and existing containers. Each label must contain the following information:
1. Name, address and telephone number of the chemical manufacturer, importer, or other responsible party.
 2. Product identifier.
 3. Signal word.
 4. Hazard statement(s).
 5. Precautionary statement(s).
 6. Pictogram(s).
- B. If the label is not appropriate, the responsible department head will notify the manufacturer or supplier that the label is not adequate. A container will not be released for use until an appropriate label is affixed to the container.
- C. Labels will be removed if they are incorrect. When the container is empty it may be used for other materials provided it is properly cleaned and relabeled.
- D. Each department head is responsible for ensuring that all containers used in his/her department are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.

- E. Secondary containers should be used by one employee and emptied at the end of each shift. If the secondary containers are used by more than one employee and/or its contents are not emptied at the end of the shift, the department supervisor is responsible for labeling the container with either a copy of the original label or with a generic label which has a space available for appropriate hazard warnings.
- F. The Hazard Communication Standard (HCS) will require pictograms on labels to alert employees of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents distinct hazards. (See Figure 1)

SAMPLE LABEL	
CODE _____ Product Name _____ <div style="text-align: right; font-weight: bold; color: blue;">} Product Identifier</div>	<div style="color: blue; font-weight: bold;">Hazard Pictograms</div> 
Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____ <div style="text-align: right; font-weight: bold; color: blue;">} Supplier Identification</div>	<div style="color: blue; font-weight: bold;">Signal Word</div> <p style="font-weight: bold; color: black;">Danger</p>
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified. <div style="text-align: right; font-weight: bold; color: blue;">} Precautionary Statements</div>	<div style="font-weight: bold; color: black;">Highly flammable liquid and vapor. May cause liver and kidney damage.</div> <div style="text-align: right; font-weight: bold; color: blue;">} Hazard Statements</div>
<div style="font-weight: bold; color: black;">In Case of Fire:</div> use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish. <div style="font-weight: bold; color: black;">First Aid</div> If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.	<div style="color: blue; font-weight: bold;">Supplemental Information</div> <div style="font-weight: bold; color: black;">Directions for Use</div> _____ _____ _____ _____ <div style="font-weight: bold; color: black; margin-top: 10px;"> Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____ </div>

(Figure 1)

VIII. SAFETY DATA SHEETS (SDS) – (Formally known as MSDS)

- A. SDS's will be available to the employees on all hazardous substances to which there is potential or actual exposure. The department head is responsible for ensuring that SDS's are available on all incoming products. A product will not be released for use until a completed SDS is on file.

If the SDS is not available, the department head will notify the manufacturer that SDS is needed.

- B. The department head is responsible for the review of all incoming SDS's. If the SDS is not complete, it will be returned to the manufacturer with a request for the missing information. the department head will send a second request for the missing information if a complete SDS is not received within 30 days.
- C. The department head will request an SDS before the purchase orders of all new products.
- D. The department head is responsible for compiling and updating the master SDS file. This file will be kept on-line.
- E. Employees will have access to these SDS's during all work shifts. Copies will be made available upon request to the department head.
- F. The department head is responsible for updating the data sheets to include new information as it is received.

IX. EMPLOYEE TRAINING

- A. Prior to starting work with hazardous substances, each employee will attend a Hazard Communication Training Session where they will receive information on the following topics:
 - 1. Policies and procedures related to the Hazard Communication Standard.
 - 2. Location of the written Hazard Communication Program.
 - 3. How to read and interpret an SDS.
 - 4. Location of SDS's.
 - 5. Physical and health risks of hazardous substances in their work area.
 - 6. Methods and observation techniques to determine the presence or release of hazardous chemicals.
 - 7. Work practices that may result in exposure.
 - 8. How to prevent or reduce exposure to hazardous substances.
 - 9. Personal protective equipment.
 - 10. Procedures to follow if exposure occurs.
 - 11. Emergency response procedures for hazardous chemical spills.
 - 12. Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area.
- B. Whenever a new employee is transferred or hired, he/she will be provided training regarding the Hazard Communication Standard. The training session will be conducted by the department head before the start of his/her employment if possible.

- C. The department head is responsible for identifying and listing any non-routine hazardous task performed at this facility. the department head will conduct training on the specific hazards of the job including appropriate personal protective equipment, safety precautions, and procedures.
- D. When a new substance is added to the inventory list, the department head is responsible for reviewing the SDS for potential health effects. If the product presents a new health hazard (causes health effects unlike those covered in the training session), the the department head is responsible for notifying all affected employees about the new health effects which result from exposure to the new substance.

X. INFORMATION TO CONTRACTORS

- A. The department head is responsible for providing outside contractors with the following information:
 - 1. Hazardous chemicals to which they may be exposed as a result of working in this facility.
 - 2. Suggestions for appropriate protective measures.
- B. Contractors that are potentially exposed to hazardous chemicals present at the facility will not be allowed to begin work until they have been provided information concerning these hazards and have signed a form to document this exchange.
- C. the department head is responsible for obtaining information from contractors on all hazardous substances to which employees may be exposed as a result of the contractor's work at the facility.
- D. the department head will notify affected employees about the health affects that may result from exposure to each substance.

XI. PERSONNEL POLICIES

When an employee is not following safety and health rules regarding working with a hazardous substance, retraining will be provided and subject to disciplinary action.

XII. RECORD KEEPING

- A. the department head shall maintain the master SDS List, containing all of the SDS's received at the facility. the department head shall be promptly notified when any hazardous chemicals are no longer used at the facility. Once the department head has been notified that a chemical is no longer used, the SDS for that chemical shall be

removed from the master list and added to an inactive chemical list. The inactive chemical list shall contain the same information as the master List, and, in addition, the last known date of use for the inactive chemical shall be included in the inactive chemical list. the department head shall maintain the inactive list, along with the inactive SDS, in a permanent electronic or hard copy file.

EXCEPTION: If an employee exposure to a particular hazardous chemical occurs, the SDS for that product will become part of the employee's medical records. Medical records must be kept for **30** years.

NOTE: “Exposure” or “exposed” means that an employee is subjected to a toxic substance or harmful physical agent in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes past exposure, but does not include situations where the employer can demonstrate that the toxic substance or harmful physical agent is not used, handled, stored, generated, or present in the workplace in any manner different from typical non-occupational situations.

B. Prior master inventory lists will also be retained with inactive materials.

XIII. COMMUNITY HAZARD COMMUNICATION

The department head is responsible for responding to requests from members of the community on hazardous substances used in the facility.

XIV. EMERGENCY RESPONSE FOR HAZARDOUS CHEMICAL SPILLS

NOTE: Employees knowledgeable in the specific hazards and using all required protection to work with the chemical may clean up small amounts of spilled chemicals that do not pose a risk in excess of normal usage.

A. When a hazardous chemical spill occurs, follow these procedures:

1. Move all employees away from spill to a safe environment.
2. Call 911 or the designated emergency response number in your area to notify the necessary response team for the hazardous chemical spill.
3. Retrieve the Hazard Communication Information Binder, if possible.
 - a. Locate the SDS for the hazardous chemical which spilled.
 - b. If requested, provide the SDS to the Emergency Response Team.

NOTE: Do not try to contain large spills. The Emergency or Hazardous Material

Response Team is trained to deal with hazardous chemical spills. Additional Hazardous Waste Operations and Emergency Response can be referenced in OSHA CFR 1910.120.

XV. PROGRAM EVALUATION

The Director of Pupil Services or his/her designee will conduct an evaluation of the Hazard Communication program annually. The individual responsible for the items identified for improvement will be notified in writing. It is expected that action will be taken to correct the item within five working days.

Employees will be trained or re-trained annually to determine the effectiveness of the Hazard Communication Program. Each session will assess the employee's retention of information given during the training session, use of SDS's and response to chemical spills (if applicable).

CHECKLIST OF REQUIRED SDS INFORMATION

The Hazard Communication Standard 1910.1200 requires that 16 items of information be uniformly included in Safety Data Sheets provided to purchasers. If the preparer of the SDS has found no relevant information for a given item, the SDS must be marked to indicate that no applicable information was found. This checklist should be used to determine the completeness of the SDS. It does not assess the accuracy of the information.

Check Box If Item Is Complete

1. **Identification** (Name, address, telephone number of the chemical manufacturer)
2. **Hazard(s) identification** (Signal word, hazard statements, symbols, etc.)
3. **Composition/information on ingredients** (Impurities, stabilizing additives, etc.)
4. **First-aid measures** (Description of necessary measures, routes of exposure, etc.)
5. **Firefighting measures** (Suitable, unsuitable extinguishing media, etc.)
6. **Accidental release measures** (Personal protective equipment, emergency procedures)
7. **Handling and storage** (Conditions for safe storage, any incompatibilities)
8. **Exposure control/personal protection** (OSHA permissible exposure limit PEL, etc.)
9. **Physical and chemical properties** (Appearance, odor, thresholds, pH, melting, etc.)
10. **Stability and reactivity** (Possibility of hazardous reactions, conditions to avoid etc.)
11. **Toxicological information** (Description of the various toxicological (health) effects)
12. **Ecological information** (Persistence, degradability)
13. **Disposal considerations** (Safe handling, methods of disposal)
14. **Transport information** (Proper shipping name, transport hazard class, packing group)
15. **Regulatory information** (Safety, health, environmental regulations for products)

LETTER TO CONTRACTORS

Subject: OSHA HAZARD COMMUNICATION STANDARD

To Whom it May Concern:

The Occupational Safety & Health Administration (OSHA) Hazard Communication Standard (29CFR 1910.1200) states that contractors/suppliers must be informed of the hazardous chemicals their employees may be exposed to while performing their work and any appropriate protective measures. In order to comply with this requirement, The Wausau School District has developed a list of all the hazardous chemicals known to be present in our facility. A Safety Data Sheet (SDS) is also on file for each of these chemicals and/or hazardous substances. This information is available to you and to your employees upon request.

In order to protect the safety and health of our own employees, contractors/suppliers must provide (upon request) an SDS on any hazardous chemical or material which they bring into this facility. Failure to provide this information in a timely manner will result in the removal of the contractor/supplier from the premises.

Each employer is also responsible for notifying any subcontractor they employ regarding the requirements of OSHA's Hazard Communication Standard and other provisions described in this letter.

Sincerely,