

Hazard Communication Program

The Meriden Board of Education school district is complying with the requirements of OSHA's Hazard Communication Standard for construction by compiling a list of hazardous chemicals, using SDS's, ensuring that containers are labeled, and training our workers present at a given construction site. In addition, we provide this same information to subcontractors involved in a specific project so that they may provide this information and train their employees.

This program applies to all work operations in our school district where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

The Director of Facilities, David Paul, is the program coordinator, who has overall responsibility for the program. Mr. Paul will review and update the program, as necessary. Copies of the written program may be obtained from the office of the Head Custodian for each of the thirteen schools or from the Maintenance Office located at 22 Liberty Street.

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS, and chemical information lists from the Head Custodian for Central Office in the Maintenance Office. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. Our employees will also be informed of the hazards associated with chemicals in unlabeled pipes.

If after reading this program, you find that improvements can be made, please contact the Director of Facilities, David Paul. We encourage all suggestions because we are committed to the success of our written hazard communication program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Hazard Evaluation Procedures

Our chemical inventory (Appendix A) is a list of hazardous chemicals known to be present in our workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facility.

Michael Olock, Consultant of Eagle Environmental/Training Solutions Associates will assist in the update of the inventory as necessary.

The Head Custodian for Central Office maintains the chemical inventory list, along with related work practices used in our facility located in each production office and in the Facilities Department where it is accessible during work hours.

The school district does not manufacture any chemicals and, therefore, does not make any hazard determinations.

After the chemical inventory is compiled, it serves as a list of every chemical for which an SDS must be maintained.

Safety Data Sheets (SDS)

The SDS's we use are fact sheets for chemicals which pose a physical or health hazard in the workplace. SDS's provide our employees with specific information on the chemicals they use. Meriden Public Schools has organized the chemical inventory (attached) to feature links to SDS's. The Head Custodian or their designee is responsible for requesting SDS's at their facility. He/she may contact the chemical manufacturer or vendor if additional research is necessary. All new procurements for the school district must be cleared by the Director of Facilities or their designee.

The Pesticide Management Program contains the SDS's for all lawn chemicals. The Head Groundskeeper, John Gemmell manages these materials which are stored at 998 North Colony.

All Head Custodians have access to school computers and are urged to use browser sites like Google to obtain SDS information to supplement printed copies of materials on chemical lists.

Labels and Other Forms of Warning

Labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The chemical identity is found on the label, the SDS, and the chemical inventory. Therefore, the chemical identity links these three sources of information. The chemical identity used by the supplier may be a common or trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage"). Labels frequently contain other information, such as precautionary measures (i.e., "do not use near open flame"), but this information is provided voluntarily by our company and is not required by the rule. Our labels are legible and prominently displayed, though their sizes and colors can vary.

The head custodian at each school shall be responsible for ensuring that all hazardous chemicals in containers are properly labeled and updated, as necessary. The head custodian at each school shall ensure that newly purchased materials are checked for labels prior to use.

The Head Custodian at each school is responsible for ensuring the proper labeling of any shipped containers.

The Head Custodian at each school will refer to the corresponding SDS to assist employees in verifying label information.

A poster is displayed to inform employees about the hazard communication standard

The labeling system used on in-school and shipped containers is: a combination of GHS, NFPA, HMIS, and standard wording.

If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container. Pre-labeled spray bottles are available for any chemicals in bulk containers.

No alternatives to labeling are used in this workplace.

The following procedures are used to review and update label information when necessary and to ensure that labels that fall off or become unreadable are immediately replaced:



Training

Everyone who works with or is potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous. "Exposure" means that "an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure." Whenever a new hazard is introduced or an old hazard changes, additional training is provided.

Information and training is a critical part of the hazard communication program. We train our employees to read and understand the information on labels and SDS's, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.

Our goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use labels and SDS's, and appropriately following the protective measures we have established. As part of the assessment of the training program, the trainer asks for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

All employees receive training for hazard communication.

Training Content

Employees receive training upon hiring and then annually. Training includes hands-on, classroom, testing and audiovisual aides. The format of the training program used is video and live instruction and discussion.

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the GHS and other standard labeling system used, and access to SDS information and what it means.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

Meriden Schools HR Department ensures that all new employees are trained upon hiring as well as when a new hazard is introduced into any of our facilities.

Hazards of Nonroutine Tasks

When employees are required to perform any of the following hazardous nonroutine tasks including entering confined spaces that have the potential to expose workers to hazardous chemicals, we inform employees of these hazards by: training & supervising.

Multi-Employer Facility

When contractors or any other employers' workers (i.e., painters, electricians, or plumbers) will be working at this workplace, the Director of Facilities, will:

- Provide the other employer(s) with SDS's for any of our chemicals to which their employees may be exposed.
- Relay necessary label and/or emergency precautionary information to the other employer(s).

Each contractor bringing chemicals on-site must provide the Head Custodians with the appropriate hazard information on these substances, including the SDS's, the labels used and the precautionary measures to be taken in working with these chemicals.

Additional Information

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS's, and chemical information lists from the Director of Facilities or from the Head Custodian of Central Office

Appendix

We have attached to this plan the 29CFR1910.1200 regulations; chemical inventory list, samples, or procedures that ensure better understanding of our written program.