

Right To Know Policy

HAZARD COMMUNICATION PROGRAM 2015/16

Gorham School Department

75 South St. Suite 2

Gorham, Maine 04038

INTRODUCTION

I. Policy statement- 29 CFR 1910.1200(e)

The Gorham School Department has established this Hazard Communication Program in order to comply with 29 CFR 1910.1200, OSHA's Hazard Communication Standard, and to provide a safe and healthy workplace.

All work units are included under this program. The written program will be available for review by any employee during work hours. It is located in: The Principal's Office at each school. The Chemical Hygiene Officer will review and update the program with the Safety Committee at least annually and whenever necessary to include new hazardous materials or procedures.

The written program will be made available to employees, their designated representatives, the Assistant Secretary for Labor for OSHA, the director of the National Institute of Occupational Safety and Health (NIOSH), and the Maine Bureau of Labor Standards

In order to comply with the Federal Hazard Communication Standard (HCS), 29 CFR 1910.1200, the following written Hazard Communication Program (HCP) has been established for the Gorham, Maine School Department. This written HCP is available in the Principals office for review by any interested employee.

INVENTORY

A complete annual inventory was taken which included the following School District Owned, contractor owned, and employee "chemicals." Chemical in the system will include classroom, designed storage areas (labs), maintenance, custodial stores and kitchen areas.

MANUFACTURED CHEMICALS

Welding fumes.
Compressed air.
Steam.
Carbon monoxide from fuel burned in lift trucks.
Hydrogen gas from battery charging.
Wood dust from cutting wood.
Grinding fumes/dust.
Solder fumes.
Ozone from photocopiers and arc welding.
Processes or operations that give off smoke, sparks, dust, fumes, gases, etc.

CONSUMER PRODUCTS

Toilet bowl cleaners.
Soaps and detergents.

Bar soap.
Waxes.
Cleaners.
Paints.
Thinners.
Insecticides.
Pesticides.
Weed killers.
Fertilizer.
Motor oil.
Urinal deodorant blocks.
Bathroom deodorants.
Bleach.
Ammonia.
Plaster.
Cement.
Miscellaneous spray cans, bottles, bags, and boxes of materials.

OFFICE/CLASSROOM SUPPLIES

Photocopier chemicals such as toners and developers.
Rubber cement and thinner.
Glues.
Inks.
Stamp pads.
Chalk.
Felt tip pens.
Liquid typing correction fluids and thinners.

IN-PLANT CHEMICALS

Materials in barrels, drums, bags, fiber drums, metal cans, cylinders of compressed gas, tanks, vats, chemicals reactors, etc.
Asbestos containing materials (insulation, etc.).
Pipe, metallic and non-metallic.
Castings, metallic and non-metallic.
Tubing, metallic and non-metallic.
Parts, metallic and non-metallic if sanded, etc.
Rubber belting, if sanded, etc.
Sawdust/wood dust.
Ingots of metal to be melted.
Pellets, granules, etc. of plastic to be melted.
Parts, which are coated with antirust compounds, oil, grease, etc.
Machines containing hydraulic fluid, oil, etc.
Batteries.
Fuel tanks on vehicles.
Crankcase oil in engines.
Natural gas.
Fire Extinguishers.

OTHER CONTAINERS OF HAZARDOUS CHEMICALS WHICH MAY RESULT IN A RELEASE IF BROKEN-Maintenance only

Fluorescent light bulbs.

BULK FOOD ITEMS (Foods and ingredients used in "retail" food Preparation, i.e. for direct sale to a consumer such as in a restaurant or bar, are exempt. Also, food for employee consumption while at work is exempt.)

Sugar.

Cornstarch.

Flour.

Yeast.

Pepper.

Etc.

PHARMACEUTICAL DRUGS (Drugs that employees will use on themselves while at work are exempt.)

COSMETICS (Cosmetics that an employee will use on themselves are exempt.)

Cosmetics that will be used by the employee on another person are not exempt, need to be listed, and an SDS obtained.

NON-ARTICLES

"Articles" are exempt. However, in order for something to be classified as an article it must meet all of the following conditions:

- 1) It must be a solid - it can't be a liquid or a gas.
- 2) It must be odorless - if it has an odor, chemical exposure is occurring.
- 3) Nothing perceptible can rub off the item as it is used - if something comes off on your hands as the item is being used, chemical exposure is occurring.
- 4) You can only handle or look at the item - if you sand, drill, machine, melt, file, saw, grind, etc. on the item, dust, smoke, or fumes will be released - chemical exposure will occur.

HAZARD DETERMINATION

PURCHASED CHEMICALS

The Chemical Hygiene Officer or representative will inspect all SDS's received for purchased chemicals, contractor owned chemicals, and chemicals employees are allowed to bring into the workplace to assure that they are dated, complete, "not obviously unacceptable," and contain the information specified in Section 1910.1200(g) of the HCS.

We will rely in "good faith" on the hazard determination performed by the manufacturer when the SDS meets the above requirements. Should the SDS prove to be deficient, we shall inform the chemical manufacturer of the deficiency and attempt to secure an updated SDS that meets the requirements of the HCS. In the interim, we will rely on the information as provided by the manufacturer for chemicals already in stock.

Should a manufacturer prove unable or unwilling to provide us with an adequate SDS, we will cease using the chemical as supplied by the manufacturer and dispose of existing inventory in accordance with local, state, and federal regulations.

MANUFACTURED CHEMICALS

We will rely on the SDS's provided by all vendors/suppliers for all manufactured chemicals since we lack the in-house resources and expertise to conduct an adequate hazard evaluation. All SDS's for manufactured chemicals will be updated annually.

EMPLOYEE OWNED CHEMICALS

We have adopted a strict policy covering employee owned chemicals. Any employee who wishes to bring a chemical, including consumer products, into the workplace must first complete a request form which lists the name of the chemical, the manufacturer, the manufacturer's address, and the reason for the request.

Completed request forms will be transmitted to Chemical Hygiene Officer by the employee's supervisor. The Chemical Hygiene Officer will attempt to secure a Safety Data Sheet (SDS) from the chemical's manufacturer. All SDS's received will be evaluated according to the procedure listed below.

If it is subsequently determined that the chemical the employee wishes to bring into the workplace pose no new or excessive risks, the employee will be allowed to bring said chemical into the workplace. A list of all approved employee owned chemicals will be posted on the bulletin board for view and use by all employees.

These rules do not apply to the following employee owned chemicals which are totally exempted from regulation under the HCS.

Food, drugs, and cosmetics intended for the personal consumption by employees while in the workplace.

Things we can have in our classrooms or school work area.

- All pens and pencils.
- Other writing tools. We will have MSDS sheets on the following tools:
 - *Sharpie* markers
 - *Crayola* markers
 - *Crayola* crayons
 - *Vis-à-vis* markers
 - All *Whiteout* products.
 - Chalk – All brands, white and colored
 - *EXPO* and other white board products
 - *EXPO2 Low-Odor Dry Erase Markers*
 - *EXPO Scents Dry Erase Markers*
 - *EXPO Bold Color Dry Erase Markers*
 - *Foray Dry Erase Markers*
 - *Staples Dry Erase Markers*
 - *EXPO White Board Cleaner*
 - *Quartet Marker Board Cleaner*
- Household cleaners and miscellaneous household chemicals
 - *Disinfectant Provided by the Maint. Dept.*

- Baking soda
 - *Arm and Hammer*
 - *Hannaford*
- Vinegar, distilled white (all brands)
- Table Salt (all brands)

- Detergents :

As provided by the Maintenance Dept.

- Hand soaps

Only what is supplied by the custodian's and in our dispensers.

- Glues

- Only those provided by the school system
- *Elmer's School Glue* (white glue)
- *Elmer's Glue-All* (white glue)
- *Borden's School Glue* (white glue)
- *Crayola Art and Craft Glue* (white glue)
- Glue Sticks
 - *Permanent Glue Sticks*
 - *Scotch Glue Stick*
 - *Office Depot Glue Stick*

Spray paint-only latex type of paint, all safely stored in a cabinet.

EMPLOYEE OWNED CHEMICAL REQUEST FORM

NAME _____ DATE _____

SCHOOL _____ SUPERVISOR _____

I REQUEST PERMISSION TO BRING THE FOLLOWING CHEMICAL INTO WORK:

CHEMICAL NAME _____

MANUFACTURER _____

ADDRESS _____

CITY _____ STATE _____ ZIP CODE _____

REASON FOR REQUEST: _____

SIGNED _____

Submit to: Rob Roy @ rob.roy@gorhamschools.org or through HR.

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REQUEST APPROVED _____ DENIED _____ DATE _____

REASON _____

SIGNATURE OF DECIDING AUTHORITY _____

CONTAINER LABELING

The Chemical Hygiene Officer or representative will verify that all incoming containers of chemicals:

1. Are clearly labeled as to the identity of the contents.
2. Display the appropriate hazard warning(s).
3. List the name and address of the chemical's manufacturer.

A complete set of approved SDS's will be maintained in the Maintenance Department and will be used by personnel to verify the labels on all incoming containers of chemicals.

CONTRACTOR OWNED CHEMICALS

All contractors will be required to verify the labels on all containers of contractor owned chemicals to assure that they are labeled in accordance with the requirements of the HCS.

The Chemical Hygiene Officer or representative will periodically check labels on contractor owned chemicals to assure that the contractor is adequately performing their labeling function.

UNLABELED CONTAINERS

Delivery will be refused for all unlabeled containers and containers bearing illegible labels.

INADEQUATELY LABELED CONTAINERS

Inadequately labeled containers will be relabeled with the school's label system, chemical's Identity/name and its appropriate hazard warnings by Chemical Hygiene Officer or Designee (The user, Chemistry Teacher of Maintenance Department).

PORTABLE CONTAINERS

All portable in-plant containers, as defined by the HCS, will be labeled with the chemical's identity and its appropriate hazard warnings.

STATIONARY TANKS

The following stationary tanks of chemicals will be labeled with the

identity of the contents and its appropriate hazard warnings.

The hazards posed by chemicals in remaining stationary tanks will be handled through placarding, standard operating procedures, and batch tickets as specified in the HCS.

STATIONARY TANK INVENTORY LIST

TANK	CONTENTS	LOCATION
39,000 lbs	(EMPTY) Fuel Oil	Narragansett School
	LP gas	Great Falls School

SHIPPED CONTAINERS

All outgoing containers of hazardous chemicals will be clearly labeled as to:

1. The identity of the contents.
2. Appropriate biohazard warnings as determined by our Hazard Determination Program.
3. Our name and address.

UPDATING LABELS

The collection of approved SDS's used to verify labels on incoming containers will be updated and revised as SDS's are received which reflect new health and/or physical hazards. The entire School District labeling system will be reviewed annually by the Safety Committee (Chemical Hygiene Officer, Chemistry teachers, the Maintenance Supervisor) to determine its effectiveness and updated as required. A written report will be generated and maintained for each annual review of the labeling system.

SAFETY DATA SHEETS (SDS).

INITIAL REQUESTS

Chemical Hygiene Officer will obtain SDS's for "chemicals" purchased by the school department and employee owned chemicals. To assure the integrity of our SDS system, all purchases will be routed through our Purchasing Department.

The following form letter will be used to secure SDS's from suppliers of purchased chemicals and chemicals employees are allowed to bring into work.

(Date)

(Customer Service Department)
(Company)
(Address)
(City, State Zip Code)

Dear Customer Service Representative:

In order to complete our Hazard Communication Program, or Right to Know Program, as required by 29 CFR 1910.1200, we ask your cooperation in providing us with Safety Data Sheets for your product(s) listed below:

(List of products)

It is important for our Hazard Communication Program development that we receive your SDS's no later than (date) . Your cooperation in this matter is appreciated. Please send your SDS's to me at the address listed below.

Very truly yours,

Rob Roy
Chemical Hygiene Officer
Gorham School Department
75 South St Suite 2
Gorham, Maine 04038

No "new chemical" shall be purchased, or otherwise brought into a school, unless an MSDS has been received, reviewed, and is approved by the company for the said product. Chemical Hygiene Officer, a Chemistry Teacher or Designee will review incoming SDS's to determine if a particular "chemical" may pose physical and/or health hazards to our employees. In addition, each SDS will be reviewed to assure that it contains the information specified in the Hazard Communication's Plan.

A master set of manufacturer SDS's and SDS Evaluation Forms shall be maintained by Chemical Hygiene Officer or designee at each school, Maintenance office, and the Business Office

SAFETY DATA SHEET EVALUATION FORM

Date: _____ Evaluator: _____ SDS: PASSES / FAILS

Manufacturer: _____

Chemical: _____

___ MSDS contains no blank spaces.

___ Name and address of manufacturer.

___ Date of preparation of SDS or last change. _____

___ Emergency telephone number.

___ Listing of hazardous components.

___ Physical and chemical characteristics of the chemical.

___ Physical hazards of the chemical:

Potential for fire.

Potential for explosion.

Reactivity.

___ Health hazards of the chemical:

Signs and symptoms of exposure.

Medical conditions that may be aggravated by exposure.

___ Primary routes of entry.

___ OSHA PEL, ACGIH TLV, and manufacturer's recommended limit.

___ Have any of the hazardous components been found to be potential carcinogens by the National Toxicology Program, the International Agency for Research on Cancer, or OSHA? (Negative conclusions or "no information" do not have to be reported unless the SDS has a specific blank for carcinogenicity.)

UNACCEPTABLE SDS'S

Should a deficient SDS be found during the evaluation process, a copy of the SDS will be returned to the chemical's manufacturer with a copy of the following form letter.

SAFETY DATA SHEET REJECTION LETTER

(Date)

(Customer Service Representative or Name of Individual)

(Company)
(Address)
(City, State Zip Code)

Your Safety Data Sheet for:

does not meet the requirements of the federal Hazard Communication Standard, or Right to Know Law, Section 1910.1200. Please refer to the attached OSHA Draft SDS form and OSHA rules for a complete explanation of the SDS requirements under the HCS.

If we have not received an SDS that fulfills the requirements of the HCS by _____, we will be forced to consider forwarding a copy of your SDS and this request letter to the OSHA Region ___ Office in (City, State) for their evaluation regarding it's adequacy under the HCS.

Please contact me at (____) _____ if you have any questions regarding this request.

Very truly yours,

Rob Roy
Chemical Hygiene Officer
Gorham School Department
75 South Street Suite 2
Gorham, Maine 04038

We will not use a chemical prior to obtaining a satisfactory SDS.
If a satisfactory reply is not received, we will either file a

complaint with OSHA or dispose of all existing stock according to local, state, and federal waste disposal laws.

We will not approve any new chemical for purchase and use until a satisfactory SDS has been obtained.

RECEIPT OF CHEMICAL WITHOUT APPROVED SDS

An updated set of approved SDS's will be maintained in the Shipping and Receiving Department for the purposes of checking labels and the existence of SDS's. If Shipping and Receiving has no approved SDS for an arriving shipment of chemical, it will be assumed that no SDS has been received and/or approved and delivery of the shipment will be refused.

UPDATING SDS'S

As updated SDS's are received from suppliers, they will be evaluated as explained above for their overall acceptability. Copies of the updated SDS's will be made and distributed to all individuals having possession of a set of SDS notebooks. Those individuals will be responsible for removing the outdated SDS's from the notebook and replacing it with the updated SDS.

To assure that we are receiving updated SDS's, the following letter will be sent to all of the chemical manufacturers whose products we use annually. All updated SDS's received will be evaluated and disseminated as explained above.

SDS UPDATE LETTER

(Date)

(Customer Service Department)
(Company)
(Address)
(City, State Zip Code)

Dear Customer Service Representative:

We have on file your Safety Data Sheet for your product _____ which is dated _____. Please send us the most recent SDS for this product or sign this letter and return it certifying that the SDS we have is the most recent copy available.

It is important that we receive your reply by _____. Your cooperation in this matter is appreciated. Please send your response to me at the address listed below.

Very truly yours,

Rob Roy
Chemical Hygiene Officer
Gorham School Department
75 South St Suite 2
Gorham, Maine 04038

_____ The above dated SDS for our product is the most recent copy available.

_____ An updated copy of the SDS for our product is enclosed.

Signed _____

EMPLOYEE ACCESS TO SAFETY DATA SHEETS

IMMEDIATE ACCESS

All SDS's shall be maintained in notebooks in the principal's office and will be available at all times to employees who wish to view the SDS for a particular chemical.

UNAVAILABILITY OF AN SDS

The Chemical Hygiene Officer shall be immediately contacted by the employee's supervisor if an SDS is not available for a chemical the employee may have to use. An employee will not be required to work with any chemical for which no SDS is available.

EMPLOYEE COPY OF SDS

Any employee may request a hard copy of either the manufacturer's original SDS using the following form. A hard copy of an SDS will be supplied to an employee upon request within 15 days of receipt of a request as specified in 29 CFR 1910.20(e).

SAFETY DATA SHEET REQUEST FORM

Date: _____

Name: _____ School: _____

I hereby request a copy of the SDS for the following chemical:

Signed: _____

Submit to Rob Roy @ rob.roy@gorhamschools.org

EMPLOYEE TRAINING AND INFORMATION

CURRENT EMPLOYEE TRAINING

All of the initial employee training required by the Hazard Communication law was conducted by Chemical Hygiene Officer or designee. The format used was a combination of lecture and audiovisual materials. Attendees were given the opportunity to ask questions and receive answers. Written reference handouts were distributed to employees during the training session.

All employees were trained on all of the potential hazards of the chemicals we use at the Gorham School Department. Audiovisual materials and classroom lecture were used to present the training program. The following elements of the training program were presented by Chemical Hygiene Officer or designee.

1. An overview of the requirements contained in the Federal Hazard Communication Standard Right to Know.
2. Location and availability of our list of chemicals, copies of Safety Data Sheets and our written Hazard Communication Program.
3. Physical and health effects of the hazardous chemicals.

Flammable Liquids	Flammable Solids
Flammable Gases	Compressed Gases
Combustible Liquids	Explosives
Organic Peroxides	Oxidizers
Pyrophoric Chemicals	Unstable Chemicals
Water Reactive Chemicals	Toxic Chemicals
Highly Toxic Chemicals	Mucous Membrane Irritants
Corrosives	Sensitizers
Irritants	Carcinogens
Reproductive Toxins	Teratogens (Fetus)
Mutagens (Sperm or Egg)	Hepatotoxins (Liver)
Nephrotoxins (Kidneys)	Neurotoxins (Nervous System)

Hematopoietic Agents (Blood) Pulmonary Agents (Lungs)

Cutaneous Hazards (Skin) Eye Hazards

4. Methods and observation techniques that can be used to determine the presence or release of hazardous chemicals in the work area.

Smell (Odor Data On SDS) Sight (Appearance Data On SDS)

Taste Sound (High Pressure Leak, Etc.)

5. How to lessen or prevent exposure to these hazardous chemicals through usage of control equipment, work practices, and personal protective equipment.

6. Steps the company has taken to lessen or prevent exposure to these chemicals.

7. Emergency procedures to follow in the event of a release of chemical.

8. How to read labels and SDS's to obtain appropriate hazard information.

9. Question and answer session.

10. Each employee was given a copy of the booklet titled **Hazards in the Workplace Your Right To Know** published by BLR Company 2014 Edition

TRAINING RECORDS

Each employee signed a copy of the following training record to verify that they attended the training, understood the training, received the written handout materials, and understood our policies on Hazard Communication.

EMPLOYEE INFORMATION

In addition, all employees received additional information from their supervisors regarding the identities and locations of hazardous chemicals used in their specific work areas. Supervisors also informed employees of the identities and potential hazards of chemicals in pipes in their work areas.

EMPLOYEE TRAINING RECORD

NAME _____ DATE _____

School _____

On the above date I attended a Hazard Communication Training Program at which the following topics were explained:

- 1. An overview of the requirements contained in the Federal Hazard Communication Standard Right-To-Know.
- 2. Location and availability of the list of hazardous chemicals, copies of Safety Data Sheets, and our written Hazard Communication Program.
- 3. Physical and health effects of the hazardous chemicals.
- 4. Methods and observation techniques I can use to determine the presence or release of hazardous chemicals in the work area.

Smell (Odor Data On SDS) Sight (Appearance Data On SDS)

Taste Sound (High Pressure Leak, Etc.)

- 5. How to lessen or prevent exposure to these hazardous chemicals through usage of control equipment, work practices, and personal protective equipment.
- 6. Steps the company has taken to lessen or prevent exposure to these chemicals.
- 7. Emergency procedures to follow in the event of a release of chemical.
- 8. How to read labels and SDS's to obtain appropriate hazard information.

Signed _____

NEW EMPLOYEE TRAINING

Each employee of the Gorham School Department will attend a health and safety orientation and will receive information and training on the above-mentioned items. This new employee training will be conducted by Chemical Hygiene Officer or Designee as outlined in the previous section on "Current Employee Training." At the end of the training session, new employees will have an opportunity to have any questions answered by the instructor.

Each new employee will sign a training record to verify that they attended the training, received the written handout materials, and understood the School District's policies on the Hazard Communication law.

NEW EMPLOYEE INFORMATION

New employees will receive additional information from their supervisors regarding the identities and locations of hazardous chemicals used in their specific work area. Supervisors will also inform new employees of the identities and potential hazards of chemicals in pipes in their work area

NEW HAZARD TRAINING

Prior to a new chemical or physical hazard being introduced into any work area of a school department facility, all department employees will be trained on the new hazard as outlined above. A written training record will be signed by the employees.

In the event that a new chemical or physical hazard is discovered for a chemical we are using and communicated to us by the chemical's manufacturer on an updated SDS, employees in the affected work area will be notified. If the chemical or physical hazard is totally new to our operations, all employees will be informed and trained as specified above.

All employee training records will be maintained in the Human Resource office by the HR Department.

LIST OF HAZARDOUS CHEMICALS

The following is a list of all "Hazardous Chemicals" known to be present at each school facility in the department. Further information on each listed chemical can be obtained by reviewing the Safety Data Sheets available in notebooks located in each school. The original manufacturer's copies of SDS's are available in the front office at each school.

See Appendix "A" for a Chemical Inventory by location in the School District.

HAZARDOUS CHEMICALS LIST

Page _____ Of _____ Pages

IDENTITY

MANUFACTURER

_____ See Chemical Inventory located in **Main Office** at each school.

Designated Storage Areas

High School

Middle School

HAZARDS OF NON-ROUTINE TASKS

Periodically, employees will be required to perform non-routine tasks such as cleaning of tanks, vessels, opening of pipes, entry of confined spaces, and other maintenance operations which could result in an exposure to a hazardous chemical. Prior to starting work on such projects, each affected employee will be informed by their supervisor about the hazards of all chemicals to which they might be exposed to and protective measures they can take to minimize potential exposure.

This information will include:

1. Specific chemical identities.
2. The physical and health hazards posed by these chemicals.
3. Protective measures that the employee can take to minimize potential exposure such as use of ventilation, personal protective equipment and emergency procedures.

A current space at the Middle School is be evaluated for confine space needs and this section will be modified at a later date.

ON-SITE CONTRACTORS

INFORMING OF HAZARDS

The Building Maintenance Supervisor will inform all on-site contractors of the hazards their employees may face while performing work at any Gorham School Facility. SDS's will be made available to the contractor for the duration of the job for the chemicals his/her employees may be exposed to. The contractor will be informed of the on-site labeling used by our company.

CONTRACTOR TRAINING RECORDS

Each contractor shall sign a statement acknowledging that our SDS's have been made available to them. Prior to starting work, each contractor shall sign a statement acknowledging that his/her employees have received training on the hazards of the chemicals that they may be exposed to while working at our facility.

CONTRACTOR OWNED CHEMICALS

Prior to beginning work, each contractor shall provide the Chemical Hygiene Officer with SDS's and a list of all chemicals that will be used by the contractor's employees, or manufactured by the contractor's employees at our site. The list of chemicals and SDS's will be evaluated by Chemical Hygiene Officer or representative to determine if they pose any new or significant risks to our employees. We reserve the right to refuse to let a contractor use or manufacture a specific chemical if it poses an excess risk or would necessitate additional training of our employees.

Contractors will verify that each container of hazardous chemical they bring into our workplace is properly labeled in accordance with the requirements of the HCS and that we have been informed of the labeling system they are using.

ANNUAL HAZARD COMMUNICATION PLAN REVIEW

Annually, the School Safety Committee shall review our entire HCP to determine its completeness and effectiveness. An "Annual Hazard Communication Program Review Report" shall be written and maintained on file with Superintendent of the Gorham School Department.

The last review and updates were: January 6, 2016