Hazard Communication Program

GLOBALLY HARMONIZED SYSTEMS(G.H.S)

ROCKFORD PUBLIC SCHOOLS

Table of Contents

INTRODUCTION	2
PURPOSE	2
ROLES AND RESPONSIBILITIES	2
HAZARDOUS CHEMICAL LIST	3
LABELING OF HAZARDOUS CHEMICALS	3
SECONDARY CONTAINERS	4
PIPES AND PIPING SYSTEMS	4
SAFETY DATA SHEETS	5-6
NON-ROUTINE TASKS	6
CONTRACTORS AND NON-RPS EMPLOYEES	6
POSTING REQUIREMENT	6
TRAINING	7-8

Hazard Communication Program

INTRODUCTION

Rockford Public Schools is committed to providing a safe environment for all staff, students and visitors. This program is intended to ensure compliance with the Occupational Safety and Health Administration(OSHA) Hazard Communication Standard(HCS). OSHA revised the HCS to align with the Globally Harmonized System(GHS) of Classification and Labeling of Chemicals in 2012. This program has been updated to reflect the alignment of OSHA and GHS.

This program applies to ALL work related operations of Rockford Public Schools where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.

PURPOSE

The purpose of this Hazard Communication Program is to inform employees working for the Rockford Public Schools of the chemical hazards present in their work environment and ways to protect themselves during normal working conditions and during any emergency situation that could arise. This program is essential to implementing and complying with the regulations and addressing the following items:

- Safety Data Sheets (SDS)
- Labels
- Hazardous Chemical Inventory
- Training

ROLES AND RESPONSIBILITIES

Maintenance Department is responsible for:

- Development and revision of the Hazard Communication Program
- Compliance Review
- Training and SDS interpretations
- Ensure employees are aware of the program and location of the SDS
- Maintaining the SDS sheets
- Notifying Head Custodians of any changes/ such as new chemicals, replaced chemicals or a change in the Hazard Communication Program

Employees who work with hazardous chemicals are responsible for:

- Ensuring online training is completed
- Knowing location of the SDSs and Hazard Communication Program
- Reading SDS and labels before using hazardous chemicals
- Following safety instructions contained in SDS and labels
- Ensuring all chemicals are properly labeled and stored
- Informing the Maintenance Department of improper or missing SDS or labels for chemicals

HAZARDOUS CHEMICAL LIST

A list of hazardous chemicals can be found in the Right to Know Hazard Communication Program Binder. The list will be in alphabetic order and match the order of Safety Data Sheets within the binder. The list will have some chemical information shown in a different color. These chemicals are chemicals which our Pest Control Company; Envirosafe could use at any point in time in the building. These are NOT chemicals Rockford Public School buildings keep on hand and stocked.

The list will be maintained by the Head Custodians who will be notified of changes by the Maintenance Department. When a new chemical is introduced, Maintenance will supply the Head Custodian of the building with the new SDS to be placed within their Binder.

LABELING OF HAZARDOUS CHEMICALS (GHS Format)

Labels provide employees with an immediate source of information and should not under any circumstances be removed or tampered with. It is the manufacturer's responsibility to label all hazardous chemicals when being shipped out of the company's facility. If any hazardous chemical is transferred from a larger container to a smaller (secondary) container a label must be present. All labels must be legible in English, and prominently displayed on containers.

As of June 1st 2015, all labels are required to have the following:

- Product Identifier provides a means by which to identify the chemical
- Signal Word DANGER, WARNING
- Hazard Statement- fatal if swallowed, toxics if swallowed etc.
- Precautionary Statement- response in case of accidental spillage, exposure etc.
- Supplier Identification name, address, and telephone number of chemical manufacturer, importer, or other responsible party
- Pictogram(s)- toxicity, flammables, explosives, carcinogens, respiratory hazard, oxidizers etc.

Example of label is shown below:



Secondary Containers

When Transferring a chemical from one container to another, or replacing a damaged label, employees are required to label the container using the appropriate hazard warnings using the correct GHS label format.

Pipes and Piping Systems

Pipes and systems containing hazardous chemicals should be labeled properly according to the Hazard Communication Standards if applicable. The Rockford Public Schools Maintenance Department is responsible for labeling pipes.

SAFETY DATA SHEET

A Safety Data Sheet is a document that contains relevant information about the hazards of using a specific chemical or product. It is required by MIOSHA that copies of SDSs for hazardous chemicals are readily accessible to employees at each work site during each work shift.

SDSs must be maintained and kept for thirty years as they are considered part of an employee's medical records. Any SDSs of chemicals no longer used or chemicals which have been replaced MUST be placed into the orange archive folder. The folder should be stored with the Hazard Communication Program Binder in your building.

All SDSs will be kept in the Hazard Communication Program book in alphabetical order and accessible for all staff, students and visitor to view.

As of June 1, 2015 SDSs are required to be uniform and contain the following section numbers, headings and information listed under each heading (see below).

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); ACGIH Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the SDS where available as well as appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

SDSs will be maintained by both the Maintenance Department and the Head Custodians in each building. Maintenance will notify the buildings Head Custodian of any updates or new SDSs for new products being used in the building. Maintenance will send the SDS over to the Head Custodian who will be responsible for properly posting and filing it away in the Hazard Communication Program books.

Head Custodians will be responsible for maintaining and obtaining SDSs for any products purchased outside of what Maintenance supplies, such as hazardous items from a hardware store. They will be responsible for notifying Maintenance if they are missing a SDS for a product or if they have a damaged unreadable SDS for a product the Maintenance Department supplies to the building.

NON-ROUNTINE TASKS

On occasion employees may be required to work in hazardous areas. Prior to starting work each employee will be given information about the hazardous involved when such occasions occur.

CONTRACTORS and NON-RPS EMPLOYEES

Contractors and non RPS employees bringing hazardous chemicals to any of our building will be responsible for providing an SDS. RPS employees and Contractors or Non RPS employees may view SDSs of hazardous chemicals that RPS supplies and vis versa for RPS employees with Contractor's and Non RPS employees SDSs.

POSTING REQUIREMENTS

There are two posters which will be used in each building to notify employees about their rights and SDS locations and revisions. The poster shown as CET-2105 is used to remind workers of their rights under the Michigan RTK laws and to provide information of where to locate SDSs and the RTK program. The CET-2106 poster informs workers or any recent changes to SDSs made. Whenever an SDS has been updated it must be listed on this poster for employees to review. This must be done in a timely manner meaning, within 5 days of receiving the updated SDS this must be shown on this poster. It must also be displayed for at least 10 days.

Below are photo of each poster:

CET-2105

This Workplace Covered by the Michigan Right To Know Law	MÎ SHA
Employers must make available for employees in a readily accessible manner, Material Safety Data Sheets (MSDS): for those hazardous chemicals in	MSDS(s) For This
their workplace. Employees cannot be discharged or discriminated against for exercising their rights including the request for information on hazardous chemicals.	Workplace Are
Employees must be notified and given direction (by employer posting) for locating Material Safety Data Sheets and the receipt of new or nevised MIDS(s).	Located At
* When the employer has not provided a MSDS, employees may request essistance in obtaining MSDS from the	
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Construction Salety & Health Division For Section Science Scie	Through Page 1985 St. William
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CET-2106

As Required by the Michigan Right To New Or Revised Now Law THE REPORT THE INVENTED HOUR SHEET IS SHEET LAND SHEET LAN				
Mew or Revised	Receipt Date	Posting Date	Location of Mew or Revised SDS	
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TRAINING

Rockford Public Schools will provide employees of RPS who are exposed to hazardous chemicals with training on hazardous chemicals in their buildings/worksites. Their initial training will be completed through our online training site http://site.gcntraining.com/. This and more information can be found on our webpage under the staff links section. Current employees will be given a certain length of time to go and complete the required training and once completed will receive a dated certificate. These records can be found at the Maintenance Department or can be found within the buildings Hazard Communication Program Binder. The following will be covered at a minimum in their training videos.

- 1. Overview of Hazard Communication regulation, including employee's right under the laws.
- 2. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area including visual appearance and odor.
- 3. All physical and health hazards the chemicals present in the work area.
- 4. What measures employees can take to protect themselves from the hazardous chemicals including emergency procedures, proper work practices and personal protective equipment to be used.
- 5. Details of the hazard communication program developed by Rockford Public Schools which include explanation of the labels on containers, SDS, and how employees can locate and review information for this program.

- 6. Important definitions to help the employee understand the meanings of words often used on data sheets or labels on hazardous chemicals.
- 7. Explanation of the labeling systems used for hazardous chemicals, such as the U.S Department of Transportation, National Fire Protection Association etc.
- 8. How to read a SDS and use it to identify:
 - a. Physical and Health Hazards
 - b. Exposure Protective Measures
 - c. Storage and Handling Procedures
 - d. Spill Reponses Procedures
 - e. First Aid Procedures
- 9. All current and new employees will be required to sign off on the Hazard Communication Program review sheet which can be found following this document. It must be reviewed each year unless told by Maintenance that it needs to be reviewed more than once in a year. This is a required part of training.

Training will only be required for those employees who are exposed or handle hazardous chemicals.