

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

INTRODUCTION

Section 402(1) of the Oklahoma Statutes, Title 40 Section 401 et seq includes public schools as being obligated to follow the Rules for Oklahoma Hazard Communication Standard, promulgated by the Oklahoma Commissioner of Labor. The program described in this manual has been developed so that the Muskogee Public Schools will be in compliance.

Employers and employees have a right and need to know the properties and the potential safety and health hazards of substances to which they may be exposed. As an employer, Muskogee Public Schools intends to provide and maintain conditions of work which are reasonably safe and healthful for employees. The Muskogee Public Schools Hazard Communication Standard Program is to assure that each employee receives the information and training needed to work safely. It is a tool for providing communication to personnel about hazards and how to deal with them.

I. GENERAL PROGRAM DESCRIPTION

A summary description of the program follows. After the summary, some of the components will be described in greater detail.

A. Management:

The Director of Maintenance & Facilities will be the Hazard Communication Standard Program Manager. The Safety Coordinator will work with Administrator and Directors to assure that training is occurring in each department. If the Program Manager is not in the Maintenance office, the Program Director of Custodial Support Services will be available for questions and requests concerning the program.

B. Participating Personnel:

All employees shall participate in the program. The degree of involvement and training will vary based on the level of contact an employee is likely to have with physical or health hazards and other safety risks.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

- C. **Identification of Hazardous Substances:**
In compliance with regulations labels shall be applied to containers of hazardous substances.
- D. **Hazardous Locations:**
Locations where hazardous substances are used, stored, or transported will be identified and marked as required.
- E. **Training and Communication:**
An employee training and education program will be developed to provide information to employees about the hazardous substances in their work areas. Communication channels will be established to transmit information to and from employees consistent with the rights, and responsibilities employees have about knowledge of hazardous substances.
- F. **Fire Safety:**
The fire safety regulations call for keeping the Muskogee Fire Department informed of hazards. A system for placards to mark areas for the Fire Department is also a part of the program.
- G. **Monitoring and Evaluation:**
A system for reviewing the Hazards Communication standard Program, shall exist in the form of a district safety committee. The committee shall consist of supervisors and who are in contact with hazards.
- H. **Records:**
The district shall maintain Material Safety Data Sheets as defined in the regulations and any additional information relating to toxicity or health hazards of these substances. Chemical Information Lists shall be maintained as will records of injury or illness of employees. Record of training shall also be maintained as shall records regarding program monitoring. An understanding of proper use of the records required in this program is the basis for understanding the program itself.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

II. IDENTIFICATION OF HAZARDOUS SUBSTANCES

A. Definition:

To carry out the requirements of the Rules it is necessary to determine what items are defined as hazardous under the Hazard Communication Standard. According to "Rules For Oklahoma Communication Standard Implementing Title 40, Sections 401 through 424, Oklahoma Statutes as Amended" the following definitions apply:

1. Hazardous Substances is any substance which is a physical hazard or a health hazard.
2. Physical Hazard means a chemical which is a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive, and which is contained in the "U.S. Occupational Safety and Health Administration's list of Hazardous Materials, 29 CFR Part 1910 subpart H", and any substance for which a Material Safety Data Sheet has been provided by the manufacturer as a hazardous material, or such substances deemed by the Commissioner, based on documented scientific evidence, that poses threat to the safety of an employee.
3. Health Hazard means any chemical or biological substance or agent which is listed in the "U.S. Occupational Safety and Health Administrations list of Toxic and Hazardous Substances, 29 CFR Part 1910 subpart Z" and any other substance including but not limited to chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatopietic system, and agents which damage the lungs, skin, eyes or mucous membranes, and any substance for which a Material Safety Data Sheet has been provided by the manufacturer as a hazardous material, or such substances deemed by the Commissioner, based on scientific documented evidence, that pose a threat to the health of an

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

- B. Most products used in the workplace are not hazardous as defined by the Hazard Communication Standards. The regulations do not apply to any substances which are foods, drugs, or cosmetics products intended for consumption by employees or students while in the workplace.

They do not apply to any consumer products and food stuffs packaged for distribution to, and intended for use by the general public. When Purchasing products for use in the District, attempt will be made to purchase products that are not hazardous, yet ones that can be used to carry out the desired task.

- C. Determination of Hazardous Substance:

1. Material Safety Data Sheets (MSDS)

New purchases of items that may be hazardous will be so designated by the vendor through the use of Material Data Sheets (MSDS). All vendors will be required to provide an MSDS if appropriate for any purchases made by the school. The MSDS will define the hazard and give instructions for its use. Additional information about Material Safety Data Sheets will be given in the section on records.

2. Inventory

At the time of the adoption of this program, there may be unidentified hazardous items located in the District. An initial step in this program is that an inventory of such items shall be compiled. The Program Manager in coordination with each principal shall oversee the inventory process. Forms to assist in conducting the inventory are included in the appendix. The Initial Survey Form: Chemical Data is to be completed by a worker or teacher on each known or suspected hazardous substance in their work area. (See Appendix, Form #6001). A second Initial Work Area Form is for consolidating information (See Appendix, Form #6002). Completed copies of these forms will be sent to the Program

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

Manager at a time designated by him. The inventory should include the name of the material, supplier, where and how used, quantity, type of container, and where stored.

3. Unidentified substances that might be hazardous

If while inventorying for hazardous substances, a question regarding whether something is a hazard, the material or information about it will be brought to the attention of the Program Manager.

By using the "Code of Federal Regulations Title Title 29 Parts 1900 to 1910" and/or "Rules For Oklahoma Hazard Communication Standard Implementation Title 40, Sections 401 through 424, Oklahoma Statutes as amended" or other sources the Program Manager shall determine if a substance in question is hazardous.

The "Rules of Oklahoma Hazard Communication Standard" will be used in place of "CFR 29, 1910, 1200". Such identification shall be done promptly and the substance shall be treated as as though it is hazardous until such time as it is deemed otherwise. If a substance is found to be hazardous, an MSDS shall be secured or developed.

4. Labeling

The Program Manager shall insure that each container of hazardous substances covered in the "Rules for Oklahoma Hazard Communication Standard" which is located in the workplace shall be labeled, tagged or marked with the identity of the hazardous chemicals contained and appropriate hazard warnings. Labels shall be legible, in English and prominently displayed. Required labeling does not apply to substances required by the Federal Insecticide, Fungicide, and Rodenticide Act, 61 Stat. 163 (7 USC Section 121 et al.)

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

- a. **Manufacturer's Labels:**

Manufacturers, importers and distributors of hazardous substances are required by law to label containers. Therefore virtually, all purchased items will be labeled on receipt and normally further labeling by the District will not be necessary. If a manufacturer's label on a hazardous substance has been removed, it is not legible, or unsatisfactory for some other reasons, it shall be put out of use until properly labeled by District personnel.
- b. **Stationary Containers:**

Signs or placards in lieu of affixed labels may be used on individual stationary process containers if they convey the information required for labels.
- c. **Pipelines:**

Pipelines shall be labeled at the valves located at the point at which the substance enters the workplace.
- d. **Temporary or Portable Containers:**

Normally hazardous substances will not be transferred into temporary portable containers unless the substance is to be used immediately by the employee. In such instances, no labeling is required. If a transfer is necessary and the substance is not immediately used, labels must be affixed.
- e. **Removal of Labels:**

No employee shall remove or deface existing labels on containers of hazardous substances unless the containers are immediately marked with the required information.
- f. **Receipt of New Products:**

It is an exception to the general practice if any new purchase is not first received at the Districts Central Warehouse. Exceptions are some activity fund purchases usually bought locally, most cafeteria purchases and locally purchased items to carry on maintenance. The principals in the case of activity funds, the cafeteria area of maintenance have the responsibility for

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

seeing that any purchases of hazardous substances for these areas that they approve and that are not received at the District Central Warehouse are treated in ways that comply with the requirements of this program. MSDS need to be sent to Attn: Training and Safety Coordinator, Central Warehouse .New purchases received at the District Central Warehouse will be checked at delivery to see if they are hazardous as defined in this program. If a purchase is hazardous, it will be checked to be sure it is properly labeled and steps will be taken to see if it is handled as a hazardous substance. A receipt log for hazardous substances shall be maintained by the Training and Safety Coordinator assigned to assist the Program Manager. At the time of receipt the Training and Safety Coordinator will also check to be sure a Material Safety Data Sheet (MSDS) has been received or made.

g. Trade Secrets:

If a vendor has a substance protected because of Trade Secrets claims, labeling will be by the supplied trade secret registry number.

II. Hazardous Locations

A. Storage:

1. Storage of Hazardous Substances Used in Operations and Maintenance:

Unless an extreme inconvenience is caused, hazardous substances shall be stored in the District Central Warehouse. If it is necessary to store hazardous substances in a school, principals in coordination with the Director of Plant Operations, shall designate area(s) for storage of hazardous substances on their campuses. The fewer storage places the better, but convenience of access to workers, shall be a consideration. The storage room, closet, or cabinet will be locked except when materials are being taken or returned.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

Storage areas in a school or other District buildings shall have sufficient ventilation for any substance contained therein not to become dangerous. Temperature shall be controlled to prevent any stored item from becoming hazardous. Fire extinguishers should be positioned nearby and be readily construction secured to a wall and on a shelf below eye level. Employees shall not store chemicals on the floor unless the item is too large for shelf storage. Areas are to be kept clean and neatly arranged for easy accessibility and fire safety. Chemicals which react violently with each other should not be stored in close proximity. Acids should be in a cabinet for acids. Severe poisons should be in a cabinet for poisons and flammables in a cabinet for flammables. Storage areas shall be marked "Authorized Personnel Only"

Questions about storage might be resolved by checking "School Science Laboratories A Guide To Some Hazardous Substances" which is contained in the appendix of this manual. If that is not sufficient, check with the Program Manager who will answer or find the answer to any question. Although it is not mandatory, the combination of the J. F. Baker and Flinn Scientific storage schemes is suggested as a means of eliminating chemical incompatibilities in a storage area.

2. Storage of Hazardous Substances in the Instructional Program:

Some classroom instruction incorporates the use of hazardous substances. Science, agriculture, industrial arts, art, photography, and possibly home economics are examples. When instructional objectives can be fully achieved without utilizing hazardous substances, teachers should not use these substances.

Storage of hazardous substances for instruction will vary somewhat by school level and subject since the quantity and type of hazardous substances differ by school level and subject. Hazardous substances at the elementary school and middle school levels will be stored following the guidelines established in the preceding section for operations and maintenance.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

Both may follow the more elaborate plan which follows and is prescribed for the high school.

Because of its specialized curriculum and because it has a special science storage area, Muskogee High School is to utilize "School Science Laboratories A Guide To Some Hazardous Substances" which is system combines the color coding scheme developed by the J.F. Baker Chemical Company and the Flynn Scientific Storage Scheme.

Assuming that outside the science field, with the possible exception of Vocational Agriculture, the quantity of hazardous substance is low, hazardous substance for all instructional areas will be stored in the science storeroom. Vocational Agriculture may develop storage in the Vo-Ag Shop but if it chooses to the teacher will follow "School Science Laboratories A Guide To Some Hazardous Substances".

3. Disposal of Hazardous Substances:
Hazardous substances, which should be disposed of because of age, lack of need, danger or whatever reason shall be disposed of in accordance with requirements of state and federal laws and regulations. Empty containers shall be handled as required (NOTE: at this time we have not found such regulations and this section will be added to once we learn the process).

IV. TRAINING AND COMMUNICATION

A. Training:

1. Content:

The Training and Safety Coordinator shall plan and mplement an employee training and education program designed to communicate information to employee(s) about hazardous substances to which they are exposed. This training and education shall be provided at least annually.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

It shall include but not be limited to : the nature of the hazards; appropriate work practices; protective measures; and emergency procedures. Such information shall not be inconsistent with that contained in the MSDS which shall be used as a basis for the training and education program.

Additional instruction shall be provided whenever the employees may be routinely exposed to additional hazardous substances, substances which require special precautions or whenever the employee's potential for exposure is increased due to changes in work practices or through introduction of new toxic and hazardous substances or equipment.

2. New Hires or Transfers:

When a position is filled at a time when annual group instruction about hazards will not occur within thirty days of the first day of work, individual instruction must be given. The program Director and/or the employee's supervisor, usually principal, shall provide the training. The worker shall be given a copy of this program with a brief explanation of how he is to become informed. The employee will be assigned to read and study the manual which contains the program description.

3. Annual Training:

Group sessions shall be held annually for custodians, maintenance and cafeteria personnel, normally in August before school begins. Instruction may be provided to all personnel of these groups collectively or in separate training sessions. The amount and topics may vary based on the needs of the personnel being taught.

4. Documentation:

Documentation of all training shall be kept on file. The names, date and topics shall be on file.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

5. Service Contractors:

The district may require that service contractors whose work materials pose a health hazard to district employees be responsible for informing and training school employees appropriately. If contractors will have their employees work in the school district where contact with hazardous substances may occur, the contractor is to be notified and given information about the substances.

B. Communications, Rights and Responsibilities:

Public employees have a right and need to know the properties and potential safety and health hazards of substances to which they may be exposed.

1. **Employer Communications Exposure to Employee:** If it is discovered that an employee has received a potentially hazardous exposure to any substance or agent covered under the "Rules For Oklahoma Hazard Communication Standard", the employee shall immediately be notified and steps will be taken to provide medical evaluation, monitoring or treatment.

2. **Employee to Tell Supervisor of Exposure:** An employee upon receiving potentially hazardous exposure in the workplace to any substance or agent covered under the "Rules for Oklahoma Hazard Communications Standard" shall immediately notify the employer of such exposure.

3. **Employee Access to Records:** Upon request by an affected employee or employee representative, access shall be given to copies of the CIL, or MSDS in a reasonable time all district MSDS sheets are on file on district safety site.

Muskogee Public Schools

HAZARD COMMUNICATION STANDARD PROGRAM

4. **Employee's Right To Refuse To Work With Hazardous Substance:** If any employee requests access or copies of information about hazardous substances and has not received the information within the specified time, the employee may refuse to work with the substances or at the location for which the request was made. No punitive action can be taken for such a refusal. If employees have been provided with appropriate information and advised as to precautionary procedures, the employees may not refuse to perform their jobs.

5. **Employee's To Follow Precautions:** Employees working in areas where exposure to hazardous substance(s) exist(s) shall be required to perform their jobs in accordance with precautions communicated to them by supervisors or in training programs. Appropriate disciplinary action may be taken when employees do not comply with the precautionary measures or if employees have been provided with appropriate information and they refuse to do their jobs.

6. **Employee Information Centers:** The main information center will be posted on the Muskogee Public Schools safety web site. All pertinent information will be available to all parents and teachers at all times.

7. **Program Information Availability to Regulating Agencies:** This program and/or information relating to it is to be made available to officials of the State Department of Labor, OSHA officials or State Department of Education officials if these agencies are provided access by law or regulation.