Written Hazard Communication Program

Administration Building
50 North Road, Building 4
Chester, New Jersey 07930

Chester Twp Board of Education

2023/2024

Hazard Communication Program

Policy and Administration

The management of **Chester Twp Board of Education** is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable Federal and State health and safety rules. Under this program employees are informed of the contents of the New Jersey Public Employees Occupational Safety & Health (PEOSH) Hazard Communication Standard (HCS), the hazardous properties of chemicals with which they work, safe handling procedures, and measures to protect themselves from these chemicals.

Effective June 5, 2017, New Jersey modified its previous Hazard Communication Standard to conform to the latest Federal OSHA Hazard Communication Standard (29 CFR 1910.1200), which incorporates the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The New Jersey HAZCOM Standard (N.J.A.C. 12:100-7) additionally requires a technically qualified trainer, refresher training, and the inclusion of Right to Know (RTK) training for employees.

Evan Morley, Director Buildings & Grounds, is responsible for reviewing and implementing this written program and can provide additional information about hazardous chemicals in the workplace and appropriate emergency procedures, if necessary. This program is available at **Administration Building, 50 North Road, Building 4, Chester** for review by all employees and it includes the following required elements of the Standard:

(1) A list of hazardous chemicals;

(2) Our procedure for ensuring access to Safety Data Sheets (SDSs) and Hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals;

(3) Our procedure to ensure properly labeled containers; and

(4) A description of our training program for employees who work with or have a potential for exposure to hazardous chemicals.

Identifying Hazardous Chemicals

A list is attached to this program that identifies all hazardous chemicals at this workplace. The term *chemical* under HCS means any substance or mixtures of substances. Products in our workplace that may be considered hazardous chemicals include those which pose a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified. Manufacturers and importers are responsible to evaluate and classify products to determine the hazard classification.

Our inventory of hazardous chemicals is prepared by the Responsible Official, who will obtain and review the Safety Data Sheet for each chemical on-site. The list is continuously updated upon the purchase/receipt of new inventory. The list includes a product identifier for each chemical that can be easily cross-referenced with the product identifier on each product's label and on its Safety Data Sheet.

When we discontinue the use of any product containing hazardous chemicals, the identity of the product and information regarding the duration and locations of its usage will be maintained on a separate list, for 30 years, to address potential employee health inquiries in the future (29 CFR 1910.1020(d)(1)(ii)(B)).

Safety Data Sheets and Hazardous Substance Fact Sheets

The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) containing detailed information about the hazards and handling procedures associated with the product. SDSs are prepared for chemicals and for products that have a mixture of individual chemicals. The composition of the product and/or concentration of individual chemicals will likely vary based upon brand/manufacturer. Additionally, the New Jersey Department of Health has developed Hazardous Substance Fact Sheets (HSFSs), which are prepared mainly for pure substances. The HSFSs serve to complement Safety Data Sheets and may provide additional information on chemical hazards and handling procedures. The SDSs and HSFSs both contain information on health effects, exposure limits, personal protective equipment, first aid, and emergency procedures for fires and spills. The HSFS can complement the SDS by providing ingredient-specific information. For example, a cleaning product may have

a SDS from the manufacturer indicating that ammonium hydroxide is an active ingredient. Since ammonium hydroxide is included on the NJ Hazardous Substance List, employees can obtain specific information about ammonium hydroxide by reviewing its HSFS. The New Jersey Right to Know Law requires public employers to file a survey that reports all Hazardous Substances in the workplace that are on the Right to Know Hazardous Substance List.

In compliance with the New Jersey PEOSH Hazard Communication Standard, both Safety Data Sheets and Hazardous Substance Fact Sheets are readily accessible to all employees during their work shifts. Employees can review the documents for all hazardous chemicals used at this workplace. SDSs and access to HSFSs are kept at all locations. These documents are updated and managed by the Responsible Official. In the event an SDS is missing, or not supplied with the initial shipment, this person will obtain the document from the manufacturer or supplier.

Any new products that are planned to be used in this workplace must be approved before use to ensure that SDSs and HSFSs are obtained before use. If an SDS is not immediately accessible for a hazardous chemical, for example, while working at an off-site location, employees may obtain the required information by calling the Responsible Official.

[Note to Employer: Electronic access is permitted as long as there are no barriers to immediate employee access. If documents are being made available electronically, you must include details on how the SDSs and HSFSs can be accessed by employees, the location of the electronic system, who will provide training on the system, and when the training will be held. Product-specific Safety Data Sheets must be retained, for example, in a shared drive. Simply providing internet access to employees to look up SDS information does not meet the requirement.]

Labels and Warning Systems

The labeling system to be used by **Chester Twp Board of Education** will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including pictograms, signal words and hazard statements.

The Responsible Official will ensure that all containers are appropriately labeled. No container will be released for use until this information is verified. *Container* means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Additionally, in compliance with New Jersey's RTK requirements, pipelines will be labeled at their normally operated valves, outlets, vents, drains and sample connections designed to allow the release of a substance from the pipeline.

<u>All hazardous chemical containers at this workplace will have:</u>

1. The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party; or,
2. A replacement label with the appropriate label elements described above or, at minimum, labeling that includes: (a) the product identifier <u>and</u> (b) words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals *(for example, the pictograms associated with the product and the signal words "danger" or "warning")*.

It is the policy of this workplace that the original HCS-compliant manufacturer's label on incoming containers shall not be removed or defaced. Containers not bearing a HCS-compliant

label are not accepted by our facility. Workplace labels must be legible, prominently displayed, and in English. Information in other languages may be made available upon request. All employees share a responsibility to report to their supervisor any labels that become illegible, fall off the container, or are obscured in any manner.

Small quantities intended for immediate use may be placed in a container without a label, provided that the individual keeps the container in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the work day. However, the container should still be marked with its contents. If the portable container is stored beyond the employee's shift, or will be used by other workers, it must be labeled with the HCS information from the properly labeled original container.

[Note to Employer: As of December 1, 2015, all distributors were required to ship containers with the new HCS label elements. Products you have in-stock from before that date may be labeled under the previous Standard. The Hazard Communication Standard does not cover the labeling requirements for hazardous waste. Also note that there are certain exemptions for pesticides and products regulated by the FDA. Please contact PEOSH if you have specific questions about container labeling.]

Employee Training

Every employee who works with or has the potential for exposure to hazardous chemicals under normal conditions of use, or in foreseeable emergencies, will receive initial and refresher training under the PEOSH Hazard Communication Standard on the safe use of those hazardous chemicals. The Responsible Official is responsible to ensure that employees are trained as follows:

- The training is conducted by a technically qualified person.
- Whenever a new hazard is introduced into the work area, an additional training session is provided for workers prior to beginning work with the new hazardous material. Supervisors notify employees about the required trainings.

- Refresher training, an abbreviated version of initial training, is conducted every two years by a technically qualified person.

- Attendance is **mandatory** at all training sessions for those workers identified as exposed or having the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies.

- Training is provided at no cost to the employee and is provided during working hours. The training is appropriate in content and vocabulary to the educational level, literacy and language of the employees.

- Training records will be maintained which include the following information: dates, contents of the training sessions, names and qualifications of persons conducting the trainings, names and job titles of all persons attending the training sessions.

- Supervisors will receive additional training to ensure they can answer employee questions, provide daily monitoring of safe work practices, and ensure the appropriate use of any assigned PPE. Supervisors should contact the responsible person listed within this program with technical questions.

- Input from employees regarding the training sessions and suggestions for improvement will be obtained through training evaluation forms.

[Note to Employer: The bullet points above may be expanded to provide a more complete explanation of the training methodology used at your workplace. NJ PEOSH has added training requirements that exceed the Federal Standard - refer to N.J.A.C. 12:100-7.1 et seq. An employer's training program is to be a forum for explaining to employees not only the hazards of the chemicals in their work area, but also how to use the information generated in the hazard communication program. This can be accomplished in many ways (audiovisuals, classroom instruction, interactive video) and should include an opportunity for employees to ask questions to ensure that they understand the information presented to them. Training need not be conducted on each specific chemical found in the workplace but may be conducted by categories of hazard (e.g., carcinogens, sensitizers, acutely toxic agents) that are or may be encountered by an employee during the course of his/her duties.]

The **initial training session** includes the following discussion items:

1. The requirements of the PEOSH Hazard Communication Standard, the Federal Hazard Communication Standard, and an explanation of the applicable provisions of the Worker and Community Right to Know Act, N.J.S.A. 34:5A-1 et seq.

2. The location of the written hazard communication program and the list(s) of hazardous chemicals.

3. The location and availability of SDSs, HSFSs, Right to Know Survey, the RTK Hazardous Substance List (HSL), and any other hazardous material information;

4. Hazardous chemicals in their work area and any operations in their work area where hazardous chemicals are used (including the chemicals in piping systems). This includes all physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified.

5. Methods and observations that may be used to detect the release of a hazardous chemical into the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).

6. An explanation of the workplace labeling system and how employees can obtain and use hazard information, including an explanation of pictograms, signal words, hazard statements, and precautionary statements.

7. Physical hazards of chemicals such as the potential for fire and explosion, and an explanation of health hazards (both acute and chronic) associated with exposure to hazardous chemicals, the signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using SDSs and HSFSs.

8. Methods to protect against exposure to the hazards such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks.

9. Procedures to follow if an employee is exposed to these chemicals.

10. How to read and interpret the information on PEOSH HCS and RTK labels, HSFSs and SDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL.

11. A copy of the RTK brochure is distributed to all employees.

[Note to Employer: If electronic SDS and HSFS systems are used, include in the training an explanation of how employees can access the system. The hazards of the chemicals reviewed, using SDSs and HSFSs, should reflect the actual hazardous chemicals used at your workplace.]

Employee **refresher training** is an abbreviated version of the initial training, occurs at least every two years, and includes a discussion of the following information:

1. An overview of each item covered during the initial training session and explanation of any changes in the employer's written hazard communication program, PEOSH HCS, or the RTK Act.

2. Reviewing the location of the written program, SDSs, HSFSs, the workplace labeling system, and any changes in products used or work processes that may cause exposure to hazardous chemicals.

3. Reviewing the methods and observations that may be used to detect the release of a hazardous chemical into the work area and procedures to follow if an employee becomes exposed.

4. Reviewing the methods to protect against exposure to the hazards such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks.

5. A copy of the RTK brochure is distributed to all employees.

For information about Right to Know and to obtain posters/brochures:

New Jersey Department of Health
Right to Know Program
PO Box 368
Trenton, NJ 08625-0368
(609) 984-2202
https://www.nj.gov/health/workplacehealthandsafety/Right to Know/

Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, a training session is conducted to inform them about the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure. This special session is conducted by the Facilities Director, Supervisor of Maintenance, Department Chair or other appropriate Manager or Supervisor including the Principal, who will evaluate the hazards and provide appropriate controls prior to employees beginning the task. Employees who perform these non-routine tasks are notified about the training by their supervisor and are required to attend the training.

Informing contractors and other employers about our hazardous chemicals

If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site), then it is the responsibility of

the Responsible Official to provide contractors and their employees with the following information:

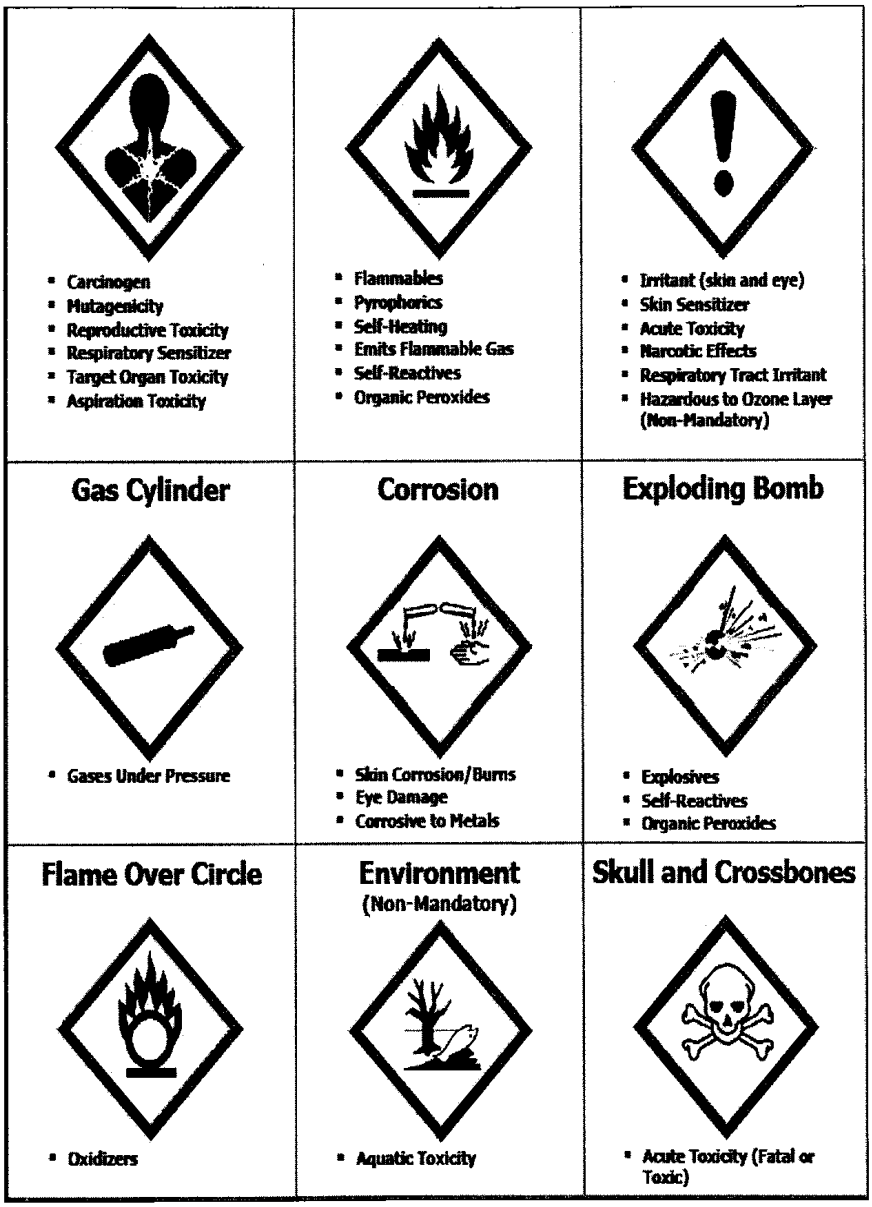
- The identity of the chemicals, how to review our Safety Data Sheets and HSFSs, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

The Responsible Official will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace.

This written program will be kept up-to-date and reviewed prior to all training sessions.

_____
Evan Morley
Director Buildings & Grounds

_____
Date

A Hazcom compliance checklist is available at:
http://healthapps.state.nj.us/forms/index.aspx#occ-38

HCS Pictograms and Hazards