



HAZARD COMMUNICATION PROGRAM

HAZARD COMMUNICATION PROGRAM	1
Purpose and Applicability	3
Safety Data Sheets	3
SDS Library:	3
Chemical Order Review:	3
Labels	4
Secondary Containers:	4
Laboratory Chemicals:	4
Training	5
Contractors	5
Non-Routine Tasks	6
References and Resources	6

Purpose and Applicability

The purpose of this document is to ensure that School District 51 is in compliance with the US Department of Labor's Occupational Safety & Health Administration's (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200. This standard ensures chemical safety in the workplace by communicating hazard information in a way that is understandable to workers.

The Environmental Health and Safety Manager is the overall coordinator of the District's program. Copies of the written program may be obtained from the Office of Environmental Health and Safety (EHS) or from the EHS [website](#).

Each employee of the District must be apprised of the contents of the HCP, the hazardous properties of chemicals they work with, and measures to take to protect themselves from these chemicals. District employees working in laboratories should consult [D51's Chemical Hygiene Plan](#) for use and handling information for laboratory chemicals. The Chemical Hygiene Plan may be obtained from EHS or from its [website](#).

Whenever possible, the least hazardous substance will be procured.

Safety Data Sheets

In compliance with OSHA's Hazard Communication Standard and the Colorado Department of Public Health and Environment's (CDPHE) regulations for schools [6 CCR 1010-6 6.12.1.C](#):

"A current SDS shall be provided in an organized and easily searchable format for all toxic or hazardous substances and shall be available for review upon request. A copy of the SDS shall be kept on file in a location away from the areas where the aforementioned chemicals are stored."

SDS Library:

SDSs were formerly known as MSDSs (Material Safety Data Sheets). EHS maintains an online library of Safety Data Sheets (SDSs) for hazardous chemicals used or stored at the District. This library is updated and maintained via the hazardous chemical ordering process and annual inventory updates. The SDS Library is accessible via the provided QR code. All District employees may also obtain a copy of a Safety Data Sheet via a verbal or email request to EHS.

SDSs must be readily available to all employees. All District Employees who use and store toxic or hazardous chemicals must ensure that an SDS for each product is available wherever the chemical is used/stored. A QR code link to SDSs for all custodial and maintenance products must be located in each stockroom and in each custodial office. QR codes linking to the chemical inventory and SDS for storage rooms must be posted in a prominent location within the classroom or storage space for ready access to all SDSs used/stored within that space.

Chemical Order Review:

All products used by D51 staff and students must be reviewed by EHS prior to order and use. CDPHE has established a list of chemicals that are either [Prohibited or Restricted](#) in all K-12 schools. Orders submitted to EHS for Prohibited chemicals will be denied and must not enter a school. Orders for

Restricted chemicals will come with a recommendation for the need of a safer substitution. If a substitute is unavailable, SOP's for the restricted chemical will be followed per the [D51 Chemical Hygiene Plan \(CHP\)](#). The SOP will include the following:

- Chemical Information
- Hazard Information
- Engineering Controls
- Required PPE
- Handling and Storage Procedures
- Spill Cleanup and Emergency Procedures
- Waste Disposal
- Experiment Protocols

Labels

All hazardous chemicals throughout D51 campuses must be properly labeled. Labeling is a part of Hazard Communication. The existing manufacturer's label must not be removed, altered or defaced. If the original label must be replaced, it must contain the same information as the original label. Labels, as required by the Occupational Safety and Health Act (OSHA) Hazard Communication standard 1910.1200, must contain the following information:

- Manufacturer name, address and phone number
- Product identifier
- Signal word ("Warning", "Danger")
- Hazard statement(s)
- Pictogram(s)
(<https://www.osha.gov/sites/default/files/publications/OSHA3491QuickCardPictogram.pdf>)
- Precautionary statement(s)

Secondary Containers:

When chemicals are transferred to other containers in the workplace (a secondary container), the OSHA required label elements must be on the new label, or the product identifier and words, pictures, symbols, or a combination thereof, in combination with other information (such as safety data sheets), can be used to provide the specific information on the hazards of the chemical.

Laboratory Chemicals:

The labeling of containers in a laboratory is specified by the [OSHA laboratory standard, 1910.1450](#) . Manufacturer chemical labels must still contain the elements listed above and must not be removed or defaced. If chemicals are transferred to a secondary container in the lab, CDPHE Regulations for schools, **6 CCR 1010-6 6.12.3.B** requires the following to be listed on the label:

- Chemical name (not just formula)

- Date of preparation
- Disposal date
- Concentration
- If possible, the physical or health hazard in words or symbols.

Safety data sheets (SDS) for the chemicals must be available to the laboratory employees and students.

If an employee transfers hazardous chemicals from a labeled container to a portable container that is only intended for **immediate use by the employee who performs the transfer**, no labels are required for the portable container. For more information, see the "Chemical Labeling Requirements" section under Section 3: Chemical Management in the [D51 Chemical Hygiene Plan](#).

Training

Each employee working with or potentially exposed to toxic or hazardous chemicals must receive initial training on the Hazard Communication Standard and the safe use of these chemicals. The training will emphasize the following:

- A summary of the standard and this written program;
- Hazardous chemical properties including visual appearance, odor and the methods that can be used to detect the presence or release of hazardous chemicals;
- Physical and health hazards associated with potential exposure to workplace chemicals;
- Procedures to protect against hazards including the use of personal protective equipment, work practices, and emergency procedures;
- Hazardous chemical spill and leak procedures;
- Where SDS's are located, how to understand their content, and how employees may obtain and use appropriate hazard information.

Initial and refresher training can be arranged by contacting EHS via email. Additional training will be provided for employees whenever a new chemical hazard is introduced into the work area. Supervisors will ensure that training is complete before an employee begins working with a new hazardous substance.

Contractors

EHS, upon notification from a supervisor or Project Manager, will advise outside contractors of any chemical hazards which may be encountered in the normal course of their work on the premises. Project Managers are responsible to supply SDSs for hazardous materials to be used in D51 Buildings to EHS.

Pest control contractors must submit SDSs to EHS for all pesticides used on campus.

Non-Routine Tasks

Supervisors contemplating a non-routine task, must consult with EHS and ensure that employees are informed of chemical hazards associated with the performance of these tasks and appropriate protective

measures. This will be accomplished by a meeting of supervisors and EHS with affected employees before such work is begun.

References and Resources

1. Colorado Department of Public Health and Environment Regulations for Schools - [6 CCR 1010-6 6.12.1.C](#)
2. [OSHA Hazard Communication Standard, 29 CFR 1910.1200](#)
3. [OSHA laboratory standard, 1910.1450](#)
4. [D51 Chemical Hygiene Plan](#)