# Mount Arlington School District

## Mount Arlington Public School

235 Howard Blvd
Mount Arlington, New Jersey

**W**ritten

**H**azard

**C**ommunication

**P**rogram

# Written Hazard Communication Program

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Compliance Program
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**Introduction**

The Federal Occupational Safety and Health Administration (OSHA) estimates that there are approximately 32 million workers who are exposed to or have the potential for being exposed to one or more chemical hazards in the workplace. The number of exposed or potentially exposed individuals, the rate at which chemicals are being introduced yearly, plus the over 600,000 chemicals that already exist support the need for workers to be informed about the chemical hazards they may encounter in the workplace (OSHA Fact Sheet 93-26).

To protect the health and safety of workers, the Federal Hazard Communication Standard, Title 29 of the Code of Federal Regulations (CFR), Part 1910.1200, was adopted by OSHA in 1983. The Hazard Communication Standard requires private employers to inform their employees of the hazards and identities of workplace chemicals to which they may be exposed. Public sector workers were not covered by the Hazard Communication Standard; however, New Jersey had adopted a law the same year which provided similar occupational health and safety protection for public sector workers, the New Jersey Worker and Community Right to Know (RTK) Act.

To increase the ability of New Jersey to protect its public sector workforce, on January 11, 2001, OSHA approved New Jersey as a State-Plan state for public employees only. In accordance with the OSHA-approved PEOSH State Plan, New Jersey must provide an occupational safety and health program that is or will be as effective as the federal program. Through the Public Employees Occupational Safety and Health Act, New Jersey adopted the Hazard Communication Standard with amendments, N.J.A.C. 12:100-7, to bring New Jersey's regulatory requirements and standards in line with OSHA requirements. The PEOSH Hazard Communication Standard (HCS), and a summary of the amendments to the federal Standard which resulted in the creation of the PEOSH HCS, are included in Appendix A and Appendix B, respectively.

The PEOSH HCS overlaps with the New Jersey Worker and the Community Right to Know Act (RTK Act) administered by the Department of Health Right to Know Program in the area of education and training of public employees. In order to prevent confusion and public employers from being subjected to two sets of rules regarding education and training, certain provisions of RTK education and training have been added to the PEOSH HCS and education and training is being removed from the RTK rules. Since public employers have been complying with the Worker and Community Right to Know Act since 1984, most public employers will have already complied with many of the requirements of the PEOSH HCS.

The PEOSH HCS requires employers that "use" (handle, package, transfer or react to) hazardous chemicals to establish a written hazard communication program and communicate the hazard information to workers through labels and other forms of warnings, Safety Data Sheets, Hazardous Substance Fact Sheets, and worker information and training programs. This written program has been developed to complying with the PEOSH HCS and making the transition from RTK training to PEOSH HCS-required training.

# Written Hazard Communication Program

**Policy and Administration**
This notice is to inform you that the Mount Arlington School District complies with the Public Employees Occupational Safety & Health Program Hazard Communication Standard (PEOSH HCS), N.J.A.C. 12:100-7, which New Jersey adopted with amendments, on May 3, 2004.

The Hazard communication Program provides a strategy to inform Faculty & Staff about the hazardous chemicals in our workplace, their associated hazards, and the methods for controlling these hazards. We have put in place the following required elements of the Standard:

(1) A list of hazardous chemicals;
(2) Safety Data Sheets (SDSs) for hazardous chemicals;
(3) Hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals;
(4) Labeled containers; and
(5) A training program for employees who work with or have a potential for exposure to hazardous chemicals.

This written program applies to all work operations in our facility where employees are exposed or may be exposed to hazardous chemicals or conditions under normal working operations or during foreseeable emergency situations.

**The Business Administrator/Board Secretary, known as the Responsible Official,** located at the Board Office, is the program coordinator who has overall responsibility for the written program and responsibility for the annual review and update of the written program. The Responsible Office also makes available the written program to employees upon their request within three days of the request.

As required under the PEOSH HCS, employees will be informed of the contents of this program, the location and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from the hazardous chemicals. This information will be provided during employee training sessions, safety meetings and/or written employee safety bulletins. Employees will also be informed of hazards of non-routine tasks.

**Inventory/Survey of Hazardous Chemicals**
The Responsible Official is responsible for the preparation of the list of the hazardous chemicals at this facility. The list of hazardous materials known to be present at the workplace will be maintained by the following:

1. Use of the annual RTK inventory survey (full survey & annual updates)
2. Purchase Orders of Hazardous Materials
3. Departments must maintain a list of their hazardous materials. The list must be updated when new hazardous material products are introduced.
4. Central warehouse/receiving areas for departments may maintain the list and update the list when new hazardous material products are received.

The Right To Know Survey will list all hazardous chemicals located at this facility. This Right To Know Survey will be updated by July 15th each year. Any hazardous chemicals brought into the workplace after July 15th will be listed by purchase order and attached to the annual Right To Know Survey. A copy of the Right To Know Survey will be maintained in the Board Office and Main Office.

**Safety Data Sheets (SDS) and Hazardous Substance Fact Sheets (HSFS)**
SDSs and HSFSs provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the SDSs are made readily accessible during each work shift to employees when they are in their work area. The Responsible Official obtains SDSs on all products containing hazardous chemicals and HSFSs on all hazardous chemicals, sends copies of the SDSs to a binder in each work area of this facility, and maintains a master file of all the SDSs and HSFSs at the Board Office. If additional information is needed about a hazardous chemical or product, if an SDS is missing, or if an SDS has not been supplied with the initial shipment, the Responsible Official will contact the manufacturer or supplier.

The staff listed below will ensure that the SDSs kept in each work area are updated as needed and the SDS binder in their department is kept intact. All SDSs received by the work area directly from a supplier or distributor must be copied and sent to the Responsible Official. As a policy of this facility, an SDS and HSFS hard copy will be provided to the requesting employee immediately upon request, or within 3 working days of the request if the SDS or HSFS is not immediately available.

| ***Name*** | ***Work Area*** |
|---|---|
| Art Teacher | Art Room |
| Science Teacher | Science Room |
| Nurse | Nurse's Room |
| Custodial/Facilities/Buildings & Grounds | Entire Facility |

Any new procedures or products that are planned to be used in this workplace must be approved by the Responsible Official before use to make sure that SDSs and HSFSs are obtained before use.

**Labels and Warning Systems**
The Responsible Official ensures that each container of hazardous chemicals in this workplace is properly labeled as required by the PEOSH HCS, and updates the labels as necessary if they should become illegible, fall off the container, or are obscured in any manner. Containers not bearing a PEOSH HCS label are not accepted by our facility.

All hazardous chemicals must be labeled in accordance with the following PEOSH HCS and Right To Know requirements. The labels must include;

1. Identity of contents in the container;
2. Hazard warning (i.e. flammable, carcinogen, etc); and
3. Five (5) predominant ingredients and anything hazardous with corresponding chemical Abstract Service (CAS) number.
4. Chemical manufacturer name & address

- Stationary containers in an area with similar contents and hazards have signs posted on or above them to convey the hazard information.

- Employees transferring hazardous materials from a labeled container to a portable container intended only for their immediate use during the work shift, do not have to label the portable container. If the portable container is stored beyond the employee's shift, or will be used by other workers, the employee labels the portable container with the PEOSH HCS information from the properly labeled larger container.

**Hazardous Non-Routine Tasks**
When employees are required to perform hazardous non-routine tasks, a special 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 Business Administrator, Facilities Manager, Head Custodian/Buildings & Grounds or other appropriate technically qualified Staff members 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.

**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 for arranging or providing the training. A training program that uses both audiovisual materials and classroom instruction has been prepared for this purpose.

- The trainer meets the definition of a technically qualified person.

- Whenever a new hazard is introduced into the work area, an additional training session and/or written employee safety bulletin is provided for workers prior to beginning work with the new hazardous material. The coordination of this information is the responsibility of the Responsible Official. Supervisors of affected employees should reinforce all new and existing safety procedures.

- Refresher training, an abbreviated version of initial training, is conducted every two years. The Responsible Official must notify employees when the training session is scheduled to ensure attendance.

- 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.

- The documentation of training required by PEOSH HCS is maintained in the Office of the Responsible Official.

As a policy of this facility, Supervisors may receive supplemental training from selected manufacturers' representatives when specialty equipment is purchased and when non-routine hazards arise due to a new operation. They then can answer employee questions and provide daily monitoring of safe work practices.

The initial training session includes the following discussion items:

1. An explanation of the PEOSH Hazard Communication Standard and this written program;
2. Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity) and methods used in this workplace to detect the presence or release of hazardous chemicals (including the chemicals in piping systems);
3. Physical hazards of chemicals such as the potential for fire and explosion;
4. Health hazards (both acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using SDSs and HSFSs;
5. Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks;
6. Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks;

7. The location of and responsible person for maintaining SDSs, HSFSs, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;
8. An explanation of the applicable provisions of the Worker and Community Right To Know Act;
9. 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;
10. A copy of the RTK brochure is handed out during training.

The initial and refresher training programs for employees are reviewed annually by the Responsible Official, who will notify area supervisors of the training needs of their employees. As part of the assessment of the training program, input from employees regarding the training they have received and suggestions for improving the training are obtained through training evaluation forms.

Employee refresher training is an abbreviated version of the initial training, and includes a discussion of the following information:

1. An explanation of any changes in the written program, PEOSH HCS, or RTK Act.
2. Changes in products used or work processes that may cause exposure to hazardous chemicals.
3. A review of health hazards, chemical and physical properties of the hazardous chemicals, and control methods of any routinely used hazardous materials and any new hazardous materials to which the employees may be exposed. The SDSs and HSFSs will be used to review information on the hazardous chemicals.
4. A review of the facility's health and safety policy and procedure manual.
5. A copy of the RTK brochure is distributed.

**Contractor Employees**

The Responsible Official or assignees advises outside contractors in person of any chemical hazards that may be encountered in the normal course of their work on the site, the labeling systems in use, protective measures to be taken, the location and availability of SDSs, HSFSs, and other health hazard information, and the safe handling procedures to be used for these materials.

It is our policy that each outside contractor who brings hazardous chemicals on the site will provide the Responsible Official with copies of appropriate SDSs for the hazardous chemicals, information on any special labels used, and precautionary measures to be taken while working with or around their hazardous chemicals or products.

**All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS, applicable SDSs and HSFSs, and other chemical information may be obtained from the Responsible Official located at the Business Office.**

Robin C Tedesco

(Signature of Responsible Official)

Interim Business Admin

Title

September 2024

Date