EMPLOYEE RIGHT TO KNOW MANAGEMENT PLAN
FOR
BURNSVILLE-EAGAN-SAVAGE
SCHOOL DISTRICT 191

REVIEWED: November, 2026

It is the District's policy to comply with the requirements of the Federal and Minnesota OSHA Hazardous Communications and Employee Right to Know standards. The purpose of this Employee Right to Know program is to:

- Identify and inventory all potentially hazardous chemicals and harmful physical agents.
- Ensure that all employees have the knowledge and understanding of the physical and health hazards associated with the hazardous chemicals they may use.
- Ensure that all containers for such potentially hazardous chemicals are labeled.
- Maintain the current Safety Data Sheets (SDS) on our district website.
- Provide required and suitable training for employees.

This plan will apply to all work activities where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

Responsibilities

The following are the responsibilities of individuals who may be involved in the use or implementation of this program. They include: Director of Operations and Transportation Services, Health and Safety Supervisor, Director of Human Resources and each employee using hazardous chemicals in the workplace. The responsibilities are listed below.

Director of Operations and Transportation, Health and Safety Supervisor

- Oversee the development of specific policies and procedures pertaining to the use and procurement of hazardous substances.
- Assure compliance with applicable policies and procedures.
- Direct the training of all employees covered under this program.
- Conduct training on the elements of the plan for all employees covered.
- Annually review and update the plan where necessary.
- Assist in the periodic inspection of performance and compliance of all trained employees on this plan.
- Provide labels for all unlabeled materials and maintain current SDS Online.
- Administer the database of required SDS for all materials used within the district.

Human Resources

- Identify newly hired employees who need training in the elements of this plan.

All District Employees

- Comply with guidelines and regulations as they may apply to this program.

- Participate in scheduled training programs on the elements of this plan.
- Report all deficiencies of the program to their immediate supervisor.

Employees may obtain further information concerning the Employee Right to Know standard, applicable SDS information and chemical information lists from the Health and Safety Supervisor.

Definitions

Combustible Liquid - Any liquid having a flashpoint at or above 100 degrees Fahrenheit, but below 200 degrees Fahrenheit, except any mixture having components with flashpoints 200 degrees Fahrenheit, or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

Common Name - Any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.

Container - Any bag or barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like that contains a hazardous chemical.

Employee - A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers who encounter hazardous chemicals only in non-routine isolated instances are not covered.

Employer - A person engaged in business where chemicals are either used, distributed or are produced for use or distribution, including a contractor or subcontractor.

Exposure or Exposed - An employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential exposure. In terms of health this may include any route of entry (absorption, inhalation, ingestion or injection).

Hazardous Chemical - Any chemical which is a physical or health hazard.

Hazard Warning - Any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical and health hazards.

Health Hazard - A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.

Immediate Use - Any container that contains a hazardous chemical that will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Label - Any written, printed or graphic material displayed on or affixed to containers of hazardous substances.

Safety Data Sheet (SDS) - Listed online or printed material concerning a hazardous chemical as it relates to its makeup, personal protective equipment and hazards.

Hazard Evaluation Procedures

Independent School District 191 intends to comply with all rules and regulations that apply to the Employee Right to Know standards. This includes the district completion of an annual on-site inventory of all chemicals in the workplace. The chemical inventory will include all potentially hazardous chemicals known to be present in our workplace. After the chemical inventory is compiled, it serves as a list of every chemical for which an SDS must be maintained online. All employees experiencing contact with a hazardous chemical on the list will have available the protective measures necessary to safely work with potentially hazardous chemicals.

All hazardous chemicals will be identified by a clear labeling, whether they are found in a container or generated in work operations (for example, welding fumes, dusts and exhaust fumes). The hazardous chemicals on the inventory can cover a variety of physical forms including liquids, solids, gasses, vapors, fumes and mists. Supervisors will spot check their areas periodically to ensure that all chemicals are listed on the chemical inventory and will notify the Health and Safety Supervisor of any updates necessary. The Health and Safety Supervisor will keep the chemical inventory available to all employees during normal working hours.

Absolutely no chemicals may be brought from home.

Safety Data Sheets (SDS)

SDS are fact sheets for chemicals which pose a physical or health hazard in the workplace. SDS are intended to provide employees with specific information on the chemicals they use. The SDS collections can be found on the District website. Yellow ring binders are also maintained at the secondary school science areas.

SDS will be filed by the trade/product name. For example, Windex window cleaner would be found under the tab "W" for Windex. Employees can obtain access to SDS at any time online or by opening the yellow ring binders labeled "Safety Data Sheets" located in the secondary school science areas. All projects requiring outside contractors working on site will provide SDS for products used.

Labels and Other Forms of Warning

Labels list at least the chemical identity and the appropriate hazard warnings. The chemical identity is found on the label, the SDS and the chemical inventory. Therefore, the chemical identity links these three sources of information. The chemical identity used by the supplier may be a common or trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage"). Labels frequently contain other information, such as precautionary measures (i.e., "do not use near open flame"), but this information is provided voluntarily by our district and is not required by the rule. Our labels are legible and prominently displayed, though their sizes and colors can vary.

Printed below are the District's policies and procedures as they pertain to labeling hazardous chemicals.

- The user of the chemical is responsible for ensuring that all hazardous chemicals are properly labeled and updated, as necessary.
- A poster is displayed to inform employees about the hazard communication standard in each building.

- If an employee transfers chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container. However, ISD 191 strongly recommends putting a label on all containers containing any hazardous chemicals.
- Warning labels will be posted where harmful physical agents are at a level which may be expected to exceed the action level.

Training

Information and training is the most critical part of the Employee Right to Know program. Everyone who works with or is "potentially exposed" to hazardous chemicals will receive initial online training and annual online retraining on the Employee Right to Know Standard. Training will also include the safe use and handling of hazardous chemicals, the hazards of physical agents and all other pertinent information as it relates to the Employee Right to Know Standard.

In addition, employees will be taught to read and understand the information on labels and SDS, understand the risks of exposure to the chemicals and physical hazards in their work areas and the ways to protect themselves.

Employees covered under the Employee Right to Know Program include:

- Custodians
- Maintenance Employees
- Food Service Staff
- Art Teachers
- Science Teachers
- Industrial Technology Teachers

Supervisors are responsible for initial new employee training specific to their department. The District Health and Safety office will provide annual online refresher training thereafter.

The District intends to ensure employee comprehension and understanding including instilling awareness that they may be exposed to hazardous chemicals and physical agents; to know how to read SDS, to know how to appropriately label chemical containers and to follow the protective measures. As part of the assessment of the training program, the Health and Safety Supervisor requests input from employees regarding the training they have received and their suggestions for improving it. Training records are maintained in the Health and Safety office.

Training Content

The format of the training program used is online training.

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used and access to SDS information and what it means.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including

chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical conditions known to be aggravated by exposure to the chemical.
- Harmful physical agents, the level of exposure, effects, symptoms and emergency treatment.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, its proper use and maintenance and procedures for reporting chemical emergencies).

The procedure to train new employees at the time of their initial assignment is that they will report to Human Resources or their Supervisor to set up online training.

Contractors

When contractors or any other employers' workers (i.e., painters, electricians, or plumbers) will be working at this workplace, the Custodial staff will:

- Provide the other employer(s) with SDS for any of our chemicals to which their employees may be exposed.
- Relay necessary label and/or emergency precautionary information to the other employer(s).

Each contractor bringing chemicals on-site must provide the Director of Operations and Properties with the appropriate hazard information on these substances, including the SDS, the labels used and the precautionary measures to be taken in working with these chemicals.

Additional Information

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS, harmful physical agents and chemical information lists.