

Marcellus Central School District



Hazard Communication (Right-To-Know) Plan

Purpose/Scope: To establish the means to communicate chemical hazards.

Reason for Revision: Annual Review

Distribution List:

Business Administrator
Director of Facilities

Revised: August 2017

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Marcellus Central School District
Hazard Communication Plan

I. PURPOSE

It is the intent of the Marcellus Central School District to furnish its employees a place of employment which is free from recognized hazards and to provide reasonable and adequate protection for the health and safety of its employees.

To this end, and in compliance with New York State Labor Law, Article 28, Sections 875 et al, commonly referred to as the New York State Right-to-Know Law, and 29 CFR 1910.1200, commonly referred to as OSHA Hazard Communication Standard, the District shall:

1. Notify employees of their right to request information concerning hazardous substances in the workplace and respond to employees' requests for information concerning toxic substances to which they are exposed.
2. Maintain an inventory of hazardous substances found in the workplace and insure that Safety Data Sheets (SDSs), traditionally known as Material Safety Data Sheets, are available for those substances found at each work location. Availability may be in the form of paper copies or by electronic means such as 'MSDS Online' or other internet based providers.
3. Provide education and training to employees routinely exposed to hazardous substances; to new employees who will be routinely exposed to hazardous substances prior to initial exposure; and to employees who will be routinely exposed to a new hazardous substance introduced to the workplace prior to being required to work with it.
4. Maintain an annual Employee Product/Chemical Usage Form (Appendix E) for each employee who routinely handles or uses hazardous substances included in Subpart Z of the Federal OSHA Regulations and make those records available to the employee, his/her designee, and the Commissioner of Health. Such records shall be maintained for forty (40) years.
5. Ensure that all chemical containers are properly labeled.
6. Ensure that employees are informed of hazards associated with the performance of non-routine tasks and the appropriate protective measures. This will be accomplished by a meeting between the immediate supervisor and the affected employee(s) prior to beginning such work.
7. Notify contractors performing work on or in District facilities of the hazards known to exist within that facility that the contractor's employees may be exposed. The District shall also request that the contractor and/or subcontractor provide an SDS for all hazardous materials to be brought on-site/used in any district facility.

Marcellus Central School District
Hazard Communication Plan

I. PURPOSE (cont'd)

8. An employee may exercise any right pursuant to, or directly related to, the "Right-to-Know" Law or the Hazard Communication Standard without fear of discrimination or reprisal.
9. A copy of the District's Hazard Communication Program is available upon request to employees or their designee by contacting the Right-to-Know Officer.

II. NOTICE REQUIREMENT

The Marcellus Central School District has designated the Business Official as the District Right-To-Know Officer, herein referred to as the Right-To-Know Officer.

The Right-to-Know Officer shall ensure that signs are posted in each work location where notices to employees are normally posted informing employees of their right to request information regarding hazardous substances found in the workplace (Appendix A).

The Right-to-Know Officer shall insure that upon employment each employee is provided with informational handouts concerning the Right-to-Know Law and Hazard Communication Standard as part of the new employee's orientation.

The Right-to-Know Officer shall make any new information received concerning hazardous substances or other health and safety information available to employees.

The Right-to-Know Officer shall act as the employee's contact for obtaining information concerning hazardous substances to which (s)he is routinely exposed. Upon receipt of a Right-to-Know Request Form (Appendix B) completed by an employee and delivered to the Right-to-Know Officer, the Right-to-Know Officer shall provide the employee with the applicable requested information or Safety Data Sheet (SDS). If the SDS is not available the employee will be advised of his/her right not to work with the material. While the Right-to-Know Officer may request that the employee complete a Right-to-Know Request Form to assist in proper identification of the substance/material on which information is requested, completion of the form is not a pre-condition to the Right-to-Know Officer's responsibility to respond to an employee's oral request for information.

A permanent file for all Right-to-Know requests and responses will be maintained by the Right-to-Know Officer.

III. INVENTORY

The Right-to-Know Officer shall be responsible for maintaining a master hazardous substance inventory. The Right-to-Know Officer will maintain a master file of available Safety Data Sheets for those substances listed in the master inventory.

An inventory of hazardous substances will be provided to all supervisors at work locations where employees are routinely exposed to hazardous substances. Through the Right-to-Know Officer, Safety Data Sheets identified on the work location inventory, will be made readily accessible to employees. Availability may be in the form of paper copies or by electronic means such as 'MSDS Online' or other internet based providers.

Supervisors will be responsible for insuring that the inventory of hazardous substances found in their work location is kept current. Deletions to the inventory will be communicated in writing to the Right-to-Know Officer. Additions to the inventory will be immediately communicated in writing to the Right-to-Know Officer.

Supervisors shall be responsible for insuring that an SDS accompanies any order of a hazardous substance received into the work location. A copy of the SDS will be immediately forwarded to the Right-to-Know Officer. If an order is received without an SDS the supervisor will contact the Right-to-Know Officer in writing and the Right-to-Know Officer will take action to secure the SDS. Upon receipt of an SDS, the Right-to-Know Officer will check the master SDS file to determine the currency of the SDS and update the master SDS file and master inventory accordingly. Previously issued SDSs will be retained with the revised SDS for each product or substance.

Upon the introduction of a new hazardous substance in the workplace, the supervisor will post the applicable SDS in the work location where such substance is found for a period of two (2) weeks. No substance will be used unless an SDS is available and has been reviewed by the supervisor with the employee who will be routinely exposed to the substance.

Any employee seeking information regarding a toxic substance should contact the Right-to-Know Officer as stated on the Right-to-Know posting (Appendix A).

IV. EMPLOYEE EDUCATION AND TRAINING

The District shall provide, through the Right-to-Know Officer or his/her designee, annual training for employees who are routinely exposed to hazardous substances in the workplace. The target population for this training will typically include all employees in the following areas:

- Operations and Maintenance
- Instructional Staff
- Clerical/Office Staff
- Food Service
- Transportation

In addition to the above target populations, any other employee(s) routinely exposed to hazardous substance by nature of their job category will be identified by the Right-to-Know Officer as requiring annual training.

Employee training will be conducted at a location convenient to the job site during the employee's regular working hours without loss of pay. Annual training may be conducted during regular staff meetings. A schedule of annual training will be developed by the Right-to-Know Officer or his/her designee. New employees who will be routinely exposed to toxic substances will receive training prior to any initial exposure.

Training will also be conducted when a new hazardous substance is introduced into the workplace. Such training will be conducted by the employee's immediate supervisor, or his/her designee. A written record of the training received will be recorded on the Right-to-Know Training Record Form (Appendix D), submitted to the Right-to-Know Officer and recorded in the Right-to-Know Officer's files. Such records must be maintained for thirty (30) years from the date of last employment. Training will include the following:

1. Review of employer's obligations under the Right-to-Know Law and Hazard Communication Standard.
2. Review of employee rights under the Right-to-Know Law and the Hazard Communication Standard.
3. Methods of detection/observation of toxic/hazardous substance.
4. Physical/health hazards associated with the toxic/hazardous substance.

IV. EMPLOYEE EDUCATION AND TRAINING (cont'd)

5. Personal protective devices (if personal protective equipment is required, the employee will be specifically trained regarding the proper use of such required personal protective equipment).
6. Emergency procedures.
7. Cleanup procedures.
8. Explanation of what an SDS is; how to read and understand it.
9. Location of, and how to obtain SDSs; a copy of this program, and a chemical inventory list.
10. Location of hazardous substances to which the employee may be exposed.
11. Explanation of the labeling system used for hazardous material; how to read and interpret information on labels.

V. EMPLOYEE EXPOSURE RECORD (Employee Product/Chemical Usage Form)

The Right-to-Know Officer shall be responsible to ensure that records are maintained of hazardous substances included in Subpart Z of the Federal Occupational Safety and Health Regulations (Appendix E) to which individual employees are exposed. The Right-to-Know Officer shall make such records available to the employee, his/her physician or representative, and the Commissioner of Health for examination and copying. Such records must be maintained for forty (40) years.

All employees will be requested to complete and submit to the Right-to-Know Officer an Employee Product/Chemical Usage Form (Appendix F) on an annual basis.

The employee's immediate supervisor will be responsible for verifying the information provide by comparing the record against the work site inventory and noting any discrepancies. The supervisor shall submit the Employee Product/Chemical Usage Form to the Right-to-Know Officer. The Employee Product/Chemical Usage Form shall be filed in the Right-to-Know Officer's permanent files.

Discrepancies between the Employee's Product/Chemical Usage Form and the work site inventory will be reconciled to ensure that the work site inventory is up-to-date and requested SDS s are available. Addition/deletions to the work site inventory and SDS file will be communicated to the Right-to-Know Officer in accordance with the procedures described in the inventory section of this manual.

VI. LABELING

The Right-to-Know Officer shall ensure that each container identified as containing a hazardous material, to which employees are exposed in the workplace, is properly labeled with its contents and appropriate hazard warnings. The immediate supervisor shall review the labels provided by the manufacturer of the product to insure they include the required information. The required information is:

1. Identify of the hazardous chemical.
2. Name and address of the manufacturer.
3. Appropriate hazard warning to include health hazards, physical hazards, target organs, and personal protective equipment (Note: As of 6/1/2015, manufacturers are required to use new pictograms and warnings – see Appendix C).

Manufacturer's labels on in-coming containers of hazardous materials shall not be removed or defaced. If a label is not on a delivered container the immediate supervisor shall notify the Right-to-Know Officer immediately, in writing. The Right-to-Know Officer shall contact the manufacturer for the proper label.

The immediate supervisor shall insure that any container used to transport, transfer, or carry any hazardous material shall be labeled in accordance with the requirements of the Hazard Communications Standard. Labels shall reflect information on:

1. Identity of the product.
2. Appropriate hazard warning.
3. Name and address of the manufacturer, or other responsible party.

Stationary containers (i.e., tanks or large quantity containers) may use signs or placards so long as the sign or placard meets the requirement so the Hazard Communications Standard.

The Right-to-Know Officer shall insure that labels of hazard materials are updated when new and significant information is received.

VII. NON-ROUTINE WORK TASKS

There may be occasions when employees are called upon to perform non-routine work tasks; for example, cleaning or maintenance work in confined spaces, work on unlabeled pipes or piping, and removal of asbestos insulation, etc., which may result in exposures to hazardous materials. When these instances arise, information regarding potential hazards associated with them needs to be conveyed to employees engaged in these tasks. The following methods would accomplish this:

1. Before any non-routine work task is performed, the supervisor of the area in which the work is to be performed and the supervisor of the employee doing the work are to be notified.
2. Supervisors responsible for, and impacted by the non-routine work task, shall notify the Right-to-Know Officer well in advance of commencing the work so proper training can be given to affected employees.
3. The supervisor will be responsible for ensuring that all affected workers are informed of known potential hazards associated with the task.

VIII. OUTSIDE CONTRACTOR WORK

When it is necessary for an outside contractor to perform work within any facility of the District, it is the obligation of the Right-to-Know Officer to inform the contractor of the identity of any hazardous materials to which their employees may be exposed. The procedure for informing the contractor should consist of the following:

1. Making the facility's hazardous materials inventory available to the contractor, and indicating specific chemicals of concern in the work area.
2. Making the Safety Data Sheets of the identified hazardous materials available to the contractor.
3. Advise the contractor of the appropriate protective measures taken by the facility to protect their employees from the physical and health hazards.
4. If there is a potential for the facility's employees to be exposed to materials used by the contractor, the Right-to-Know Officer and/or his/her designee shall review the proposed procedures and materials. Where necessary, proper control measures to ensure the protection of school district employees are to be implemented.
5. In addition, the contractor shall provide written verification that their employees have been provided Hazard Communication/Right-to-Know training.

YOU HAVE A RIGHT TO KNOW!

Your employer must inform
you of the health
effects and hazards
of toxic substances
at your
worksite.

Learn all
you can
about toxic
substances
on your job.

For more
information,
contact:

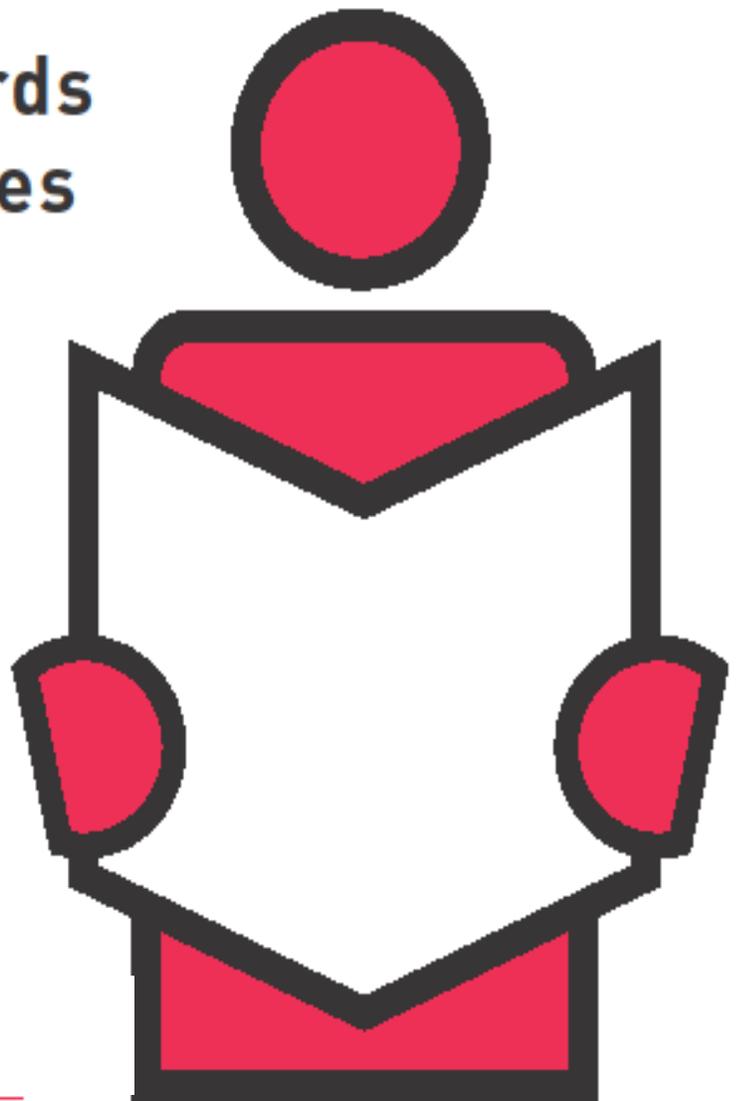
**Anthony Sonnacchio,
Business Administrator**

Name

Business Office: (315) 673-6002

Location & Phone Number

THE RIGHT TO KNOW LAW WORKS FOR YOU.
NEW YORK STATE DEPARTMENT OF HEALTH



APPENDIX B

**"Right-to-Know" Law
Employee Information Request Form**

This form is provided to assist employees to request information from their employer regarding the health and safety hazards of a chemical product found in their workplace.

Please Print:

Name _____ Phone Number _____

Job Title _____ Supervisor _____

Work Location _____

Describe briefly the chemical/product for which you are requesting additional information:

1. Trade Name _____ Product/Code # _____

2. Chemical Name or Ingredients (if known) _____

3. Manufacturer (Name and Address, if known) _____

4. Does substance have a label? _____ *Yes* _____ *No*
If *Yes*, attach a copy of the label or a copy of the information on the label.

5. Physical form of substance: _____ *Gas* _____ *Liquid* _____ *Solid* _____ *Dust* _____ *Other*

6. Any other information which will identify the substance (the circumstances of exposure, other characteristics of the substance and etc.).

7. If you have specific questions, write them below.

Signature _____

Date ____/____/____

Received by:
Employer Rep: _____
Hour: _____ Date: ____/____/____

APPENDIX C

Hazard Communication Standard Pictograms (Required for MFG's as of 6/1/2015)

Hazard Communication Standard Pictogram

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards

<p>Health Hazard</p>  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (Fatal or Toxic)

Occupational Safety and Health Administration, U.S. Department of Labor, www.osha.gov 800-321-6742, OSHA 3491-02 2012



APPENDIX E – Subpart Z Tables

For a copy of the Standard and the Subpart Z Tables for Toxic and Hazardous Substances go to OSHA's website at:

<http://www.osha.gov/>

Type in [1910 Subpart Z](#) key word search

OR

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=1014

