

HAZARD COMMUNICATION

It is the intent of the Board and its Superintendent to ensure the right of all employees to know the health and safety information for all hazardous substances that they will use or handle in the course of their normal work. The expressed purpose of the Hazard Communication Program is to provide a safe environment for all individuals through procedures that will identify and evaluate all hazardous substances and subsequently provide information and training to all individuals that will allow the safe use of any hazardous substance. The intent of this policy is to fulfill the requirements of Federal OSHA's Hazard Communication Standard (HazCom) per 29 CFR 1910.1200.

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Legal Refs.: Code of Virginia, 1950, as amended, §22.1-274.1
8 VAC 20-530-10 et seq.

HAZARD COMMUNICATION PROCEDURES

Staff Responsibilities

The Superintendent of Schools shall oversee this program and delegate responsibilities relating to this hazard communication program to the Environmental Compliance Manager . Each principal, director, and supervisor, or their designee, shall be responsible for implementation of the program in their work areas, classrooms, laboratories and related activities under their supervision. Additional chemical safety and storage requirements for school laboratories, darkrooms, and art rooms are contained in Albemarle County Public Schools' Chemical Hygiene Plan. Questions concerning this program should be directed to the Environmental Compliance Manager.

Program Elements

I. Hazard Communication Plan

Each department/school shall maintain an up-to-date Hazard Communication Plan. The plan shall contain the following:

- A. An outline of the County's hazard communication program;
- B. Access instructions for the Safety Data Sheet (SDS) database maintained at <http://hq.msdsonline.com/countyofalbemarle>; and
- C. Backup CD and battery powered computer for SDS database access in the case of power outage.

II. Hazardous Chemical Inventories

The Hazard Communication Standard requires the establishment and maintenance of a hazardous chemical inventory for each work area in which hazardous chemicals are stored or used. Any substance which is capable of producing adverse effects on the health and safety of human beings is considered to be a hazardous chemical and shall be listed on the inventory. All chemical products produced or used in the school division which have health or safety warnings on their labels shall be included on the inventory.

The Superintendent will name a designee to evaluate all art materials used in the division to identify those which are toxic, in accordance with criteria established by the Virginia Department of Education. All material used in the division which meet the criteria as toxic shall be so labeled and the use of such art materials shall be prohibited in kindergarten through grade five.

It shall be the responsibility of the principal (or designee) of the school or the director (or designee) of an office to ensure that all hazardous chemicals in facilities under his supervision be inventoried by work location. Chemical inventories will be printed as needed from the online SDS database. The Environmental Compliance Manager shall be immediately notified of changes to hazardous chemical inventories and will update the SDS online database accordingly.

III. Product Labels

At each work location, the person responsible for receiving materials shall verify that all incoming containers of chemicals or chemical substances are properly labeled by the manufacturer with the following information:

- A. Name of chemical/chemical substance;
- B. Appropriate hazard warning;
- C. Name and address of manufacturer, vendors, or responsible party.

No hazardous chemical will be released for use until the container has been checked for the above information. Product containers with incomplete labels shall be refused and returned to the vendor.

Original labels will not be removed from any container received for use; and if materials are repackaged, the new containers will be labeled with content information.

Secondary containers are to be labeled with either an extra copy of the original manufacturer's label or a generated label which clearly indicates the chemical name and the appropriate hazard warning.

The only container not requiring a label shall be when the entire transferred chemical/chemical substance is to be used immediately by the preparer. If any label becomes illegible through use or spillage, a label must be added with the information required in subsections A, B, and C above.

IV. Safety Data Sheets

A Safety Data Sheet (SDS) is a technical bulletin detailing health and safety information about hazardous chemicals. A SDS tells employees about the hazards of chemicals used in their work locations and the safety precautions that should be taken when handling them. Data sheets for all hazardous chemicals to which school division employees may be exposed shall be kept in the online MSDS database.

The Environmental Compliance Manager shall be responsible for obtaining a SDS for hazardous chemicals, verifying their completeness and ensuring the online database has been appropriately updated. The principal (or designee) of a school and the director (or designee) of an office shall be responsible for ensuring that the online SDS database is available to employees in work areas where hazardous chemicals are used or stored. Employees can find a list of all hazardous chemicals used or stored at their work locations in the online SDS database. Employees who are unable to access the online SDS database should contact the Environmental Compliance Manager at (434) 975-9340 for assistance. Before a new chemical is introduced to a work location, a SDS shall be made available for review by the affected employees.

When hazardous chemicals are ordered it shall be specified on the purchase order that the chemicals are not to be shipped without corresponding material safety data sheets.

A. Obtaining Safety Data Sheets

1. If there is a substance for which there is no SDS available in the SDS database, or if a supervisor is uncertain whether a material is hazardous, the Environmental Compliance Manager shall be notified. The following information should be given:
 - a. complete chemical/product name;
 - b. manufacturer name;
 - c. manufacturer's complete address;
 - d. manufacture's phone (if available).
2. The Environmental Compliance Manager will contact the manufacturer/distributor requesting a SDS for that chemical/product.
3. If the distributor does not respond within approximately 21 days, a follow-up letter will be sent.
4. In the event that no SDS is sent by the distributor after repeated requests, purchasing will be requested to stop all purchases from the distributor; and, if appropriate, the Environmental Compliance Manager will contact a Virginia Occupational Safety and Health (VOSHA) representative for further action.

B. Information

The SDS must provide information on:

1. product identification;
2. hazard identification;
3. composition/information on ingredients;
4. first aid measures;
5. fire-fighting measures;
6. accidental release measures;
7. handling and storage;
8. exposure controls/personal protection;
9. physical and chemical properties;
10. stability and reactivity; and
11. toxicological information.

V. Hazardous Non-Routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. Prior to

starting work on such projects, each affected employee will be given information by their supervisor about the hazardous substances to which they may be exposed during that activity. Each department will maintain a list of non-routine tasks and provide a copy to the Environmental Compliance Manager. Information given to the employees should include:

- A. specific physical/chemical hazards;
- B. protective and/or safety measures the employees can take; and
- C. measures the school division has taken to reduce the hazards including ventilation, personal protective equipment, administrative controls, and posted emergency procedures.
- D. if the supervisor/department manager or any employee has a question concerning hazardous materials they may encounter in a non-routine task, they should contact the Environmental Compliance Manager for assistance in assessing the problem.

VI. Unlabeled Pipes

Occasions arise when employees must repair plumbing and pipes. No employee is to repair or replace any unlabeled pipe until the contents of the pipe are determined and precautionary steps relating to the hazardous chemical can be implemented. This does not apply to water pipes as long as no other safety hazards are apparent (such as hot water/steam or electricity).

VII. Notification of Contractors

- A. It shall be the responsibility of the appropriate supervisor to provide contractors under his supervision with the following information in writing, prior to the starting of work:
 - 1. Identification of hazardous chemicals to which employees of the contractor may be exposed while on the job site.
 - 2. Precautions that they can take to lessen the possibility of chemical exposure.

It is the contractor's responsibility to provide his employees with this information.

- B. Construction contracts shall include a requirement for contractors to provide school division with information on hazardous materials they will use. Prior to the start of construction, the contractor should furnish the Director of Building Services a list of chemicals that may be brought onto the job site. If an additional chemical, not on the initial list, is brought onto the job site, the Director of Building Services shall be given prior notification. When requested, the contractor shall furnish SDS forms for any chemicals to be brought onto the job site. This information must also be provided to the Environmental Compliance Manager.

VIII. Employee Training

- A. New Employee Orientation: Prior to starting work, each Albemarle County employee assigned shall receive a health and safety orientation. During the orientation, the employee shall receive information and training as follows:
1. An overview of the requirements contained in the Hazard Communication Standard;
 2. Location and availability of the Albemarle County written Hazard Communication Program;
 3. Types of chemicals present in the work place;
 4. Physical and health effects of the hazardous chemicals;
 5. Methods and observational techniques used to determine the presence of hazardous chemicals in the work area;
 6. Control/work practices and personal protective equipment used to lessen or prevent exposure to hazardous chemicals;
 7. Steps Albemarle County has taken to lessen or prevent exposure to hazardous chemicals;
 8. General safety emergency procedures to follow if employees or students are exposed to hazardous chemicals;
 9. Instruction in how to read labels and review Safety Data Sheets to obtain appropriate hazard information; and
 10. Instruction in how to access the online SDS database.
- B. Employee Specific Chemical Safety Training: Department heads, principals, supervisors, or their designees will implement a training program with emphasis on hazardous materials found in their specific work place. The employee shall receive information and training in the following areas:
1. Chemicals present in the work place operation
 2. Container labeling
 3. Health hazards
 4. Reduction of exposure through control/work practices and personal protective equipment
 5. Chemical storage and waste management
 6. Physical/chemical characteristics
 7. Reactivity data
 8. Fire/explosion hazards
 9. Observation techniques and methods used to determine the presence or release of hazardous chemicals/vapors in the work area
 10. Emergency procedures in event of exposure and/or spill

The Human Resources Office will ensure each new employee is provided information on the Hazard Communication Program.

After attending the general orientation training class, each employee will sign a form to verify that he attended the training and received written materials relating to the

regulation on Hazard Communication. The form will be forwarded to the Safety and Wellness Coordinator for review and placement in the person's personnel file. The Safety and Wellness Coordinator will also maintain the Schools Online Annual Training (OATS) records related to the annual Hazard Communication information for all personnel. Prior to a new hazardous chemical being introduced into any section of school division, each employee of that section will be given information as outlined in Paragraph VIII, No. 2 above.

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