

	School District:	Medford Area Public School District 124 West State St Medford, WI 54451 715-748-4620
	Review Date(s):	January 11 th , 2013
	Program Coordinator:	Jennifer Kuenne
Hazard Communication Program		

1.0 GENERAL

- 1.1 Purpose:** The Occupational Safety and Health Administration’s (OSHA’s) standard on Hazard Communication (29 Code of Federal Regulations 1910.1200) is intended to ensure that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to employers and employees. This transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets, and employee training. This written program is intended to comprehensively address the issue of classifying the potential hazards of chemicals, and communicating information concerning hazards and appropriate protective measures to employees, and to preempt any legislative or regulatory enactments of a state, or political subdivision of a state, pertaining to this subject. Classifying the potential hazards of chemicals and communicating information concerning hazards and appropriate protective measures to employees, may include, for example, but is not limited to, provisions for: developing and maintaining a written hazard communication program for the workplace, including lists of hazardous chemicals present; labeling of containers of chemicals in the workplace, as well as of containers of chemicals being shipped to other workplaces; preparation and distribution of safety data sheets to employees and downstream employers; and development and implementation of employee training programs regarding hazards of chemicals and protective measures. The requirements of this section are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS), Revision 3. A copy of 29 CFR 1910.1200 is located in Appendix A.
- 1.2 Scope:** The Hazard Communication standard applies to general industry employees. Although, according to Subchapter III – General Requirements of Chapter SPS 332 Public Employee Safety and Health, more specifically SPS 332.15 OSHA Safety and health standards which reads, “Except as provided in s. SPS 332.16 and subch. IV, all places of employment and public buildings of a public employer shall comply with the federal Occupational Safety and Health Administration (OSHA) requirements adopted under s. SPS 332.50,” the requirements of this standard also apply to all school district employees. Thus this written program applies to all applicable school district employees who may be exposed to hazardous substances under normal working conditions or during an emergency situation. This program applies to any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

1.3 Responsibility: It is the district's responsibility to provide information to our employees concerning the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training. In addition, it is the responsibility of every applicable school district employee to ensure compliance with this program. Jennifer Kuenne is the program coordinator, acting as the representative of the District Administrator, who has overall responsibility for the program. The program coordinator will review and update the program, as necessary. Copies of the written program may be obtained from the program coordinator.

2.0 HAZARD CLASSIFICATION

2.1 Chemical manufacturers and importers shall evaluate chemicals produced in their workplaces or imported by them to classify the chemicals in accordance with the regulation. For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and, where appropriate, the category of each class that apply to the chemical being classified. The district is not required to classify chemicals unless they choose not to rely on the classification performed by the chemical manufacturer or importer for the chemical to satisfy this requirement.

2.2 Chemical manufacturers, importers or employers classifying chemicals shall identify and consider the full range of available scientific literature and other evidence concerning the potential hazards. There is no requirement to test the chemical to determine how to classify its hazards. Appendix A to § 1910.1200 shall be consulted for classification of health hazards, and Appendix B to § 1910.1200 shall be consulted for the classification of physical hazards.

2.3 Mixtures

2.3.1 Chemical manufacturers, importers, or employers evaluating chemicals shall follow the procedures described in Appendices A and B to Sec. 1910.1200 to classify the hazards of the chemicals, including determinations regarding when mixtures of the classified chemicals are covered by this program

2.3.2 When classifying mixtures they produce or import, chemical manufacturers and importers of mixtures may rely on the information provided on the current safety data sheets of the individual ingredients, except where the chemical manufacturer or importer knows, or in the exercise of reasonable diligence should know, that the safety data sheet misstates or omits information required by this program.

2.4 Chemical manufacturers, importers and employers evaluating chemicals shall treat the following sources as establishing that a chemical is a carcinogen or potential carcinogen for hazard communication purposes:

2.4.1 National Toxicology Program (NTP), *Annual Report on Carcinogens* (latest edition);

2.4.2 International Agency for Research on Cancer (IARC) *Monographs* (latest editions); or

2.4.3 29 CFR part 1910, subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration.

Note: The *Registry of Toxic Effects of Chemical Substances* published by the National Institute for Occupational Safety and Health indicates whether a chemical has been found by NTP or IARC to be a potential carcinogen.

2.5 The chemical manufacturer, importer or employer shall determine the hazards of mixtures of chemicals as follows:

- 2.5.1** If a mixture has been tested as a whole to determine its hazards, the results of such testing shall be used to determine whether the mixture is hazardous;
 - 2.5.2** If a mixture has not been tested as a whole to determine whether the mixture is a health hazard, the mixture shall be assumed to present the same health hazards as do the components which comprise one percent (by weight or volume) or greater of the mixture, except that the mixture shall be assumed to present a carcinogenic hazard if it contains a component in concentrations of 0.1 percent or greater which is considered to be a carcinogen under paragraph (d)(4) of this section of the rule;
 - 2.5.3** If a mixture has not been tested as a whole to determine whether the mixture is a physical hazard, the chemical manufacturer, importer, or employer may use whatever scientifically valid data is available to evaluate the physical hazard potential of the mixture; and,
 - 2.5.4** If the chemical manufacturer, importer, or employer has evidence to indicate that a component present in the mixture in concentrations of less than one percent (or in the case of carcinogens, less than 0.1 percent) could be released in concentrations which would exceed an established OSHA permissible exposure limit or ACGIH Threshold Limit Value, or could present a health risk to employees in those concentrations, the mixture shall be assumed to present the same hazard.
- 2.6** Chemical manufacturers, importers, or employers evaluating chemicals shall describe in writing the procedures they use to determine the hazards of the chemical they evaluate. The written procedures are to be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director. The written description may be incorporated into the written hazard communication program required under paragraph (e) of this section.
- 2.7** The district will then provide information to our employees concerning the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels, and other forms of warning, material safety data sheets, and information and training. In addition, this program requires distributors to transmit the required information to the district.

3.0 PROGRAM INFORMATION

- 3.1** This written program will be implemented and maintained at each district location. The program describes how the requirements for labels and other forms of warning, safety data sheets, and employee information and training will be met, and also includes the following:
- 3.1.1** A list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate safety data sheet; and,
 - 3.1.2** The methods the district will use to inform employees of the hazards of non-routine tasks (for example, the cleaning of certain equipment), and the hazards associated with chemicals contained in unlabeled pipes in their work areas.
- 3.2** The district may rely on an existing hazard communication program to comply with the requirements of 1910.1200, provided that it meets the criteria established in the Written Hazard Communication section of 1910.1200.
- 3.3** The district shall make the written hazard communication program available, upon request, to employees, their designated representatives, the Assistant Secretary, the Director, and any Department of Safety and Professional Services representatives.

- 3.4 Where employees must travel between workplaces during a work shift, i.e., their work is carried out at more than one geographical location, the written hazard communication program may be kept at the primary workplace facility.
- 3.5 Multi-employer workplaces. Employers who produce, use, or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed (for example, employees of a construction contractor working on-site) shall additionally ensure that the hazard communication programs developed and implemented include the following:
 - 3.5.1 The methods the district will use to provide the other employer(s) on-site access to safety data sheets for each hazardous chemical the other employer(s)' employees may be exposed to while working;
 - 3.5.2 The methods the district will use to inform the other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies; and,
 - 3.5.3 The methods the district will use to inform the other employer(s) of the labeling system used in the workplace.

4.0 LABELS AND OTHER FORMS OF WARNING

- 4.1 Labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer, or other responsible party. The chemical identity is found on the label, the MSDS, 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 the district and is not required by the rule. Our labels are legible and prominently displayed.
- 4.2 Except as provided in section 4.4 and 4.5 of this section, the district shall insure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the following information:
 - 4.2.1 Product Identifier - Identity of the hazardous chemical(s) contained therein; and,
 - 4.2.2 Signal Word - Appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical;
 - 4.2.3 Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party;
 - 4.2.4 Hazard statement(s);
 - 4.2.5 Pictogram(s); and
 - 4.2.6 Precautionary statement(s)
- 4.3 If the hazardous chemical is regulated by OSHA in a substance-specific health standard, the chemical manufacturer, importer, distributor or district shall ensure that the labels or other forms of warning used are in accordance with the requirements of that standard.

- 4.4** In Lieu of Affixing Labels: The district may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required by the standard to be on a label. The written materials shall be readily accessible to the employees in their work area throughout each work shift.
- 4.5** Portable Containers: The district is not required to label portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer.
- 4.6** Existing Labels: The district shall not remove or deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.
- 4.7** Label Format: The district shall ensure that labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Should we have employees who speak other languages we may add the information in their language to the material presented, as long as the information is presented in English as well.
- 4.8** The chemical manufacturer, importer, distributor or district need not affix new labels to comply with this section if existing labels already convey the required information.
- 4.9** Label Revision: When we become newly aware of any significant information regarding the hazards of a chemical we will revise the labels for the chemical within six months of becoming aware of the new information. If the chemical is not currently produced or imported, the employer shall add the information to the label before the chemical is introduced into the workplace again.
- 4.10** Responsibility: Department Chairs are responsible for ensuring all hazardous chemicals located within the district are properly labeled, are legible, and updated, as necessary. It is also the responsibility of the Department Chairs to ensure that newly purchased materials are checked for labels prior to use. The Department Chairs will refer to the corresponding MSDS to assist employees in verifying label information.
- 4.11** Alternatives: No alternatives to labeling are used in this workplace.
- 4.12** Updating Labels: In order to review and update label information when necessary and to ensure that labels that fall off or become unreadable are immediately replaced, it is the responsibility of all employees to ensure that the hazardous chemicals they are working with are properly labeled at all times.
- 4.13** This program does not require labeling of the following chemicals:
- 4.13.1** Any pesticide as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 *et seq.*), when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Environmental Protection Agency;
- 4.13.2** Any chemical substance or mixture as such terms are defined in the Toxic Substances Control Act (15 U.S.C. 2601 *et seq.*), when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Environmental Protection Agency;
- 4.13.3** Any food, food additive, color additive, drug, cosmetic, or medical or veterinary device or product, including materials intended for use as ingredients in such products (*e.g.*

flavors and fragrances), as such terms are defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 *et seq.*) or the Virus-Serum-Toxin Act of 1913 (21 U.S.C. 151 *et seq.*), and regulations issued under those Acts, when they are subject to the labeling requirements under those Acts by either the Food and Drug Administration or the Department of Agriculture;

- 4.13.4 Any distilled spirits (beverage alcohols), wine, or malt beverage intended for nonindustrial use, as such terms are defined in the Federal Alcohol Administration Act (27 U.S.C. 201 *et seq.*) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol, Tobacco, Firearms and Explosives;
- 4.13.5 Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 *et seq.*) and Federal Hazardous Substances Act (15 U.S.C. 1261 *et seq.*) respectively, when subject to a consumer product safety standard or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission; and,
- 4.13.6 Agricultural or vegetable seed treated with pesticides and labeled in accordance with the Federal Seed Act (7 U.S.C. 1551 *et seq.*) and the labeling regulations issued under that Act by the Department of Agriculture.

5.0 HAZARD EVALUATION PROCEDURES & SUBSTANCE INVENTORY

Our chemical inventory is a list of hazardous chemicals known to be present in our workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, 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 list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facilities. All staff members will conduct an annual physical inventory of all hazardous chemicals located within the school district facilities.

The program coordinator, with the assistance of all staff members, is responsible for collecting, maintaining, and updating, a master list of hazardous substances used or stored in the facilities. The program coordinator will keep the chemical inventory list, along with related work practices used in our facilities in the district office as well as online, where it is accessible during work hours. The list will contain the common identity or trade name of the product and the name and address of the manufacturer. Substances that are not in containers will also be included in the list (welding fumes, carbon monoxide from a forklift, etc.). After the chemical inventory is compiled, it serves as a list of every chemical for which a MSDS must be maintained. Hazardous substances do not include:

- Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 *et seq.*), when subject to regulations issued under that Act by the Environmental Protection Agency;

- Any hazardous substance as such term is defined by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. 9601 et seq.) when the hazardous substance is the focus of remedial or removal action being conducted under CERCLA in accordance with Environmental Protection Agency regulations;
- Tobacco or Tobacco products;
- Wood or wood products. **NOTE:** Wood dust is not exempt;
- Food or alcoholic beverages which are sold, used, or prepared in a retail establishment and foods intended for personal consumption by employees while in the workplace;
- Consumer products (pens, pencils, adhesive tape, etc.) used in the workplace under typical consumer usage;
- Manufactured solid items under normal conditions of use that do not emit more than a trace amount of a hazardous substance (i.e. plastic chairs);
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies);
- Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- Any consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended;
- Nuisance particulates where the chemical manufacturer or importer can establish that they do not pose any physical or health hazard covered under this section;
- Ionizing and nonionizing radiation; and
- Biological hazards

6.0 MATERIAL SAFETY DATA SHEETS

- 6.1** The district shall have a material safety data sheet in the workplace for each hazardous chemical which we use or have in our possession. The MSDSs we use are fact sheets for chemicals, which pose a physical or health hazard in the workplace. MSDSs provide our employees with specific information pertaining to the chemicals they use. The departmental chairs are responsible for obtaining/maintaining the MSDSs at our facilities. It is their duty to contact the chemical manufacturer or vendor if additional research is necessary. The program coordinator must clear all new procurements for the district. All MSDS's will be stored within the MSDSonline system where an active chemical inventory will be located. Take out sentence prior and after if they are not using MSDSonline. The school district will/has trained all staff on the MSDSonline system.
- 6.2** Each material safety data sheet shall be in English (although the district may maintain copies in other languages as well), and shall contain at least the following section numbers and headings, and associated information under each heading:

- 6.2.1** Section 1, Identification;
 - 6.2.2** Section 2, Hazard(s) identification;
 - 6.2.3** Section 3, Composition/information on ingredients;
 - 6.2.4** Section 4, First-aid measures;
 - 6.2.5** Section 5, Fire-fighting measures;
 - 6.2.6** Section 6, Accidental release measures;
 - 6.2.7** Section 7, Handling and storage;
 - 6.2.8** Section 8, Exposure controls/personal protection;
 - 6.2.9** Section 9, Physical and chemical properties;
 - 6.2.10** Section 10, Stability and reactivity;
 - 6.2.11** Section 11, Toxicological information;
 - 6.2.12** Section 12, Ecological information;
 - 6.2.13** Section 13, Disposal considerations;
 - 6.2.14** Section 14, Transport information;
 - 6.2.15** Section 15, Regulatory information; and
 - 6.2.16** Section 16, Other information, including date of preparation or last revision.
- 6.3** If no relevant information is found for any sub-heading within a section on the safety data sheet, the district preparing the safety data sheet shall mark it to indicate that no applicable information was found.
- 6.4** Where complex mixtures have similar hazards and contents (i.e. the chemical ingredients are essentially the same, but the specific composition varies from mixture to mixture), the district may prepare one safety data sheet to apply to all of these similar mixtures.
- 6.5** The district preparing the safety data sheet shall ensure that the information provided accurately reflects the scientific evidence used in making the hazard classification. If the district preparing the safety data sheet becomes newly aware of any significant information regarding the hazards of a chemical, or ways to protect against the hazards, this new information shall be added to the safety data sheet within three months. If the chemical is not currently being produced or imported, the chemical manufacturer or importer shall add the information to the safety data sheet before the chemical is introduced into the workplace again.
- 6.6** Districts shall be provided an appropriate safety data sheet with their initial shipment, and with the first shipment after a safety data sheet is updated;
- 6.6.1** The chemical manufacturer or importer shall either provide safety data sheets with the shipped containers or send them to the district prior to or at the time of the shipment;
 - 6.6.2** If the safety data sheet is not provided with a shipment that has been labeled as a hazardous chemical, it is the respective department chair's responsibility to obtain one from the chemical manufacturer or importer as soon as possible; and,
 - 6.6.3** The chemical manufacturer or importer shall also provide districts with a safety data sheet upon request.
- 6.7** Distributors shall ensure that safety data sheets, and updated information, are provided to districts with their initial shipment and with the first shipment after a safety data sheet is updated;
- 6.7.1** The distributor shall either provide safety data sheets with the shipped containers, or send them to the district prior to or at the time of the shipment;
 - 6.7.2** Retail distributors selling hazardous chemicals to districts having a commercial account shall provide a safety data sheet to such employers upon request, and shall post a sign or otherwise inform them that a safety data sheet is available;

- 6.7.3** Wholesale distributors selling hazardous chemicals to districts over-the-counter may also provide safety data sheets upon the request of the district at the time of the over-the-counter purchase, and shall post a sign or otherwise inform such employers that a safety data sheet is available;
- 6.7.4** If a district without a commercial account purchases a hazardous chemical from a retail distributor not required to have safety data sheets on file (i.e., the retail distributor does not have commercial accounts and does not use the materials), the retail distributor shall provide the district, upon request, with the name, address, and telephone number of the chemical manufacturer, importer, or distributor from which a safety data sheet can be obtained;
- 6.7.5** Wholesale distributors shall also provide safety data sheets to district upon request; and
- 6.7.6** If a MSDS is not received at the time of first shipment, it is the respective department chair's responsibility to contact the manufacturer or distributor and request the MSDS.
- 6.8** The district shall maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). (Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted as long as no barriers to immediate employee access in each workplace are created by such options.) Employees may seek out the information they request on their own or they can request the assistance of the program coordinator.
- 6.9** The material safety data sheets are kept at the following location(s) in our facility: MSDS Online within the Medford Area Public School binder:
- a. <https://msdsmanagement.msdsonline.com/?ID=D4F45D74-43A3-4AA7-8712-18EFA8F2045D>
- 6.9.1** A complete list of every chemical used in each department is located within the electronic binder on MSDS Online.
- 6.9.2** A master list of hazardous chemicals used district wide is kept in the program coordinator's office.
- 6.10** Where employees must travel between workplaces during a work shift, *i.e.*, their work is carried out at more than one geographical location, the safety data sheets may be kept at the primary workplace facility and available online at all times. In this situation, the employer shall ensure that employees can immediately obtain the required information in an emergency.
- 6.10.1** The material safety data sheets are available through an access point on the district website located where.
- 6.10.2** A master list of hazardous chemicals used within the district is kept online within the district e-binder, electronic binder on <https://msdsmanagement.msdsonline.com/?ID=D4F45D74-43A3-4AA7-8712-18EFA8F2045D>
- 6.11** Safety data sheets may be kept in any form, including operating procedures, and may be designed to cover groups of hazardous chemicals in a work area where it may be more appropriate to address the hazards of a process rather than individual hazardous chemicals. However, the district shall ensure that in all cases the required information is provided for each hazardous chemical, and is readily accessible during each work shift to employees when they are in their work area(s).

- 6.12** Safety data sheets shall also be made readily available, upon request, to designated representatives, the Assistant Secretary, the Director, and any representatives of the Department of Safety and Professional Services.
- 6.13** Currently the district does not generate MSDSs.
- 6.14** Currently no alternatives to MSDSs are used within the district.

7.0 TRAINING

- 7.1** The district shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and material safety data sheets.
- 7.2** Employees shall be informed of the following through the district's training program:
 - 7.2.1** The requirements of 1910.1200;
 - 7.2.2** Any operations in their work area where hazardous chemicals are present; and,
 - 7.2.3** The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets
- 7.3** Employee training includes:
 - 7.3.1** Methods and/or observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the district, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
 - 7.3.2** The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
 - 7.3.3** The measures employees can take to protect themselves from these hazards, including specific procedures the district has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
 - 7.3.4** The details of the hazard communication program developed by the district, including an explanation of the labels received on shipped containers and the workplace labeling system used by their district; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.
- 7.4** Training Aids: (may use, however, not limited to) Video, Lecture, Power Point presentation, Handouts, and Online Training.
- 7.5** Affected Employees: All employees who may be exposed to hazardous substances under normal working conditions or during an emergency situation will receive initial training and any necessary retraining on the Hazard Communication standard and the safe use of those hazardous chemicals by a qualified person.
- 7.6** Additional Training: After receiving the initial training during the new employee orientation, employees will receive chemical specific training pertaining to the chemicals they will be using when they enter their home department. An annual refresher will be provided. All training is documented and kept on file.

- 7.7** New Hazard: Employees receive additional training when a new hazard is introduced, when an old hazard changes, or when they are found to be deficient on some aspect of the Hazard Communication Program.
- 7.8** Summary: Information and training is a critical part of the hazard communication program. The district trains our employees to read and understand the information on labels and MSDSs, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves. The district's goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use labels and MSDSs, and appropriately following the protective measures we have established. We ask our employees to direct any and all questions to either the program coordinator or their supervisor. As part of the assessment of the training program, either the program coordinator or the affected supervisor will ask for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

8.0 HAZARDS OF UNLABELED PIPES

If applicable, we label our pipes in employee work areas in order to inform employees of the hazards of chemicals contained within the pipes.

9.0 MULTI-EMPLOYER FACILITY

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

- 9.1** Safety Data Sheets will be made available to any person not employed by the district upon their request.
- 9.2** SDSs will be made available to all contract employees in order to inform them of the chemical hazards they are being exposed to.
- 9.3** This is done so they can take necessary precautions in handling the substances.
- 9.4** Necessary label and/or emergency precautionary information will be distributed to the other employer(s) by way of written statement once they arrive onsite.

Each contractor bringing chemicals on-site must provide the program coordinator with the appropriate hazard information on these substances prior to work beginning, including the MSDSs, the labels used and the precautionary measures to be taken in working with these chemicals. All exchange of information between the district employees and the contractor shall be documented. A documentation form is located in the appendices.

10.0 COMMUNITY HAZARD COMMUNICATION

The district administrator, Pat Sullivan will be responsible for responding to requests from members of the community on hazardous substances used within the district. If the administrator would be unavailable his or her designee would speak on behalf of the district.

11.0 RECORDKEEPING

- 11.1** Safety Data Sheets (SDS) must be maintained for thirty years after the last date of known availability/presence within the district.
- 11.2** For chemicals no longer available or present within the district, the SDS sheets will be archived in one of two ways for thirty years:
 - 11.2.1** For a chemical no longer available/present within the district with a paper copy of an SDS sheet:
 - 11.2.1.1** The last date of chemical availability/presence shall be written on the SDS sheet and then the SDS shall be retained within the district for thirty years after the written date.
 - 11.2.1.2** These archived paper SDS's shall be retained in an SDS binder at specific locations throughout the district.
 - 11.2.2** For a chemical no longer available/present within the district with an electronic SDS:
 - 11.2.2.1** The electronic SDS will be archived by clicking "Mark Inactive at Location", then by clicking on the chemical, then by clicking "Archive" sheet within an e-binder (electronic binder) within MSDSONline available at www.msdsonline.com

12.0 EMPLOYER'S AUDIT

The program coordinator will conduct an evaluation of compliance for the Hazard Communication program annually. The individual responsible for the items identified for improvement will be notified in writing. Corrective action will occur within five working days. A copy of a form to use for this task can be found in the appendices.

13.0 ADDITIONAL INFORMATION

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDSs, and chemical information lists from the program coordinator.

14.0 EFFECTIVE DATES

- 14.1** The district shall train employees regarding the new label elements and safety data sheets format by December 1, 2013.
- 14.2** Chemical manufacturers, importers, distributors, and employers shall be in compliance with all modified provisions of this section no later than June 1, 2015, except:
 - 14.2.1** After December 1, 2015, the distributor shall not ship containers labeled by the chemical manufacturer or importer unless the label has been modified to comply the regulation.
 - 14.2.2** All employers shall, as necessary, update any alternative workplace labeling used under the regulation, update the hazard communication program required by the regulation, and provide any additional employee training in accordance with the regulation for newly identified physical or health hazards no later than June 1, 2016.
- 14.3** The district may comply with either § 1910.1200 revised as of October 1, 2011, or the current version of this standard, or both during the transition period.

29 CFR 1910.1200 – Hazard Communication

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10099

29 CFR 1910.1200
HAZARD COMMUNICATION DEFINITIONS

1. **Article:** A manufactured item other than a fluid or particle:
 - (i) which is formed to a specific shape or design during manufacture;
 - (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
 - (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined by the regulation), and does not pose a physical hazard or health risk to employees.
2. **Assistant Secretary:** The Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.
3. **Chemical:** Any substance, or mixture of substances.
4. **Chemical Manufacturer:** An employer with a workplace where chemical(s) are produced for use or distribution.
5. **Chemical Name:** The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard classification.
6. **Classification:** To identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical in this section. In addition, classification for health and physical hazards includes the determination of the degree of hazard, where appropriate, by comparing the data with the criteria for health and physical hazards.
7. **Commercial Account:** An arrangement whereby a retail distributor sells hazardous chemicals to an employer, generally in large quantities over time and/or at costs that are below the regular retail price.
8. **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.
9. **Container:** Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
10. **Designated Representative:** Any individual or organization to which an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.
11. **Director:** The Director, National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designee.
12. **Distributor:** A business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.
13. **Employee:** A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

14. **Employer:** A person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.
15. **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 (*e.g.* accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (*e.g.* inhalation, ingestion, skin contact or absorption.)
16. **Foreseeable Emergency:** Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.
17. **Hazard Category:** The division of criteria within each hazard class, *e.g.*, oral acute toxicity and flammable liquids include four hazard categories. These categories compare hazard severity within a hazard class and should not be taken as a comparison of hazard categories more generally.
18. **Hazard Class:** The nature of the physical or health hazards, *e.g.*, flammable solid, carcinogen, oral acute toxicity.
19. **Hazard Not Otherwise Classified (HNOC):** An adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in this section. This does not extend coverage to adverse physical and health effects for which there is a hazard class addressed in this section, but the effect either falls below the cut-off value/concentration limit of the hazard class or is under a GHS hazard category that has not been adopted by OSHA (*e.g.*, acute toxicity Category 5).
20. **Hazard Statement:** A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
21. **Hazardous Chemical:** Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.
22. **Health Hazard:** A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to §1910.1200—Health Hazard Criteria.
23. **Immediate Use:** The hazardous chemical 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.
24. **Importer:** The first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.
25. **Label:** An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.
26. **Label Elements:** The specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.
27. **Mixture:** A combination or a solution composed of two or more substances in which they do not react.
28. **Physical Hazard:** A chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas. See Appendix B to §1910.1200—Physical Hazard Criteria.

29. **Pictogram**: A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category.
30. **Precautionary Statement**: A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.
31. **Produce**: To manufacture, process, formulate, blend, extract, generate, emit, or repackage.
32. **Product Identifier**: The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.
33. **Pyrophoric Gas**: A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.
34. **Responsible Party**: Someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.
35. **Safety Data Sheet (SDS)**: Written or printed material concerning a hazardous chemical that is prepared in accordance with the regulation.
36. **Signal Word**: A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.
37. **Simple Asphyxiant**: A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.
38. **Specific Chemical Identity**: The chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.
39. **Substance**: Chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.
40. **Trade Secret**: Any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it. Appendix E to §1910.1200—Definition of Trade Secret, sets out the criteria to be used in evaluating trade secrets.
41. **Use**: To package, handle, react, emit, extract, generate as a byproduct, or transfer.
42. **Work Area**: A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.
43. **Workplace**: An establishment, job site, or project, at one geographical location containing one or more work areas.

**MEDFORD AREA PUBLIC SCHOOL DISTRICT
HAZARD COMMUNICATION TRAINING
SIGN IN SHEET**

I have received training regarding the Hazard Communication standard including training by individual chemical and by categories of hazards. The training included the recognition of hazards in my workplace, methods to avoid exposure, safety data sheets, and procedures to follow if an exposure occurs.

Location: _____

Instructor: _____

Date: _____

Print Name	Signature	Job Title	Department	Supervisor

MEDFORD AREA PUBLIC SCHOOL DISTRICT HAZARD COMMUNICATION TRAINING PROGRAM

Information and training is a critical part of the hazard communication program. Each employee who may be exposed to hazardous chemicals when working must be provided information and trained prior to initial assignment to work with a hazardous chemical, whenever the hazard changes, and when a lack of understanding is determined and annually thereafter. Exposure or exposed under the rule means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure.

The school district will provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area, and when a lack of understanding is determined and annually thereafter. Information regarding hazards and protective measures are provided to workers through written labels and material safety data sheets.

The school district's Hazard Communication training has been designed to cover categories of hazards (e.g., flammability, carcinogenicity) and specific chemicals. In addition, the chemical-specific information will always be available through labels and material safety data sheets. Through effective information and training, employees will learn to read and understand information, determine how it can be obtained, and used in their own workplaces, and understand the risks of exposure to the chemicals in their workplaces as well as the ways to protect themselves.

Employees are informed of:

- The requirements of §1910.1200, Hazard Communication;
- Any operations in their work area where hazardous chemicals are present; and,
- The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets required by §1910.1200.

Employee training includes:

- Identifying hazardous chemicals in the workplace;
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the district, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
- The physical and health hazards of the chemicals in the work area;
- The measures employees can take to protect themselves from these hazards, including specific procedures the district has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
- The details of the hazard communication program developed by the district, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

**MEDFORD AREA PUBLIC SCHOOL DISTRICT
HAZARD COMMUNICATION
TRAINING PROGRAM CONTINUED**

Employee training also includes:

- Procedures the district has established regarding, for example, purchasing, storage, and handling of these chemicals;
- Labels and other forms of warning;
- Methods the district will use to inform employees of the hazards of non-routine tasks;
- Information related to the hazards associated with chemicals contained in unlabeled pipes; and
- The written program is made available to employees and their designated representatives.

The district does not expect that every employee will be able to recite all of the information about each chemical in the workplace. In general, the most important aspects of training under the Hazard Communication Standard are to ensure that employees are aware that they are exposed to hazardous chemicals, that they know how to read and use labels and material safety data sheets, and that, as a consequence of learning this information, they are following the appropriate protective measures established by the district.

In the event of a DSPS inspection, a DSPS compliance officer will be talking to employees to determine if they have received training, if they know they are exposed to hazardous chemicals, and if they know where to obtain substance-specific information on labels and SDS.

**MEDFORD AREA PUBLIC SCHOOL DISTRICT
HAZARD COMMUNICATION TRAINING CHECKLIST**

**SCHOOL DISTRICT
HAZARD COMMUNICATION TRAINING CHECKLIST**

Employee Name:	Date:
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Training Performed By:	Department:
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Chemicals (List Specific Chemicals Trained On)	Routes of Entry (Inhalation, Ingestion, Skin Contact, Absorption, etc.)	Potential Exposure (Accidental, Thru Use, Mixing)	Information Regarding Hazards	Protective Measures (Engineering Controls, Specific Use Areas, PPE)	Written Labels	Material Safety Data Sheets	Categories of Hazards (Flammability, Reactivity Carcinogenicity)	Physical and Health Hazards	Handling Storage and Use

Yes	No				
Yes	No				

APPENDIX G

**MEDFORD AREA PUBLIC SCHOOL DISTRICT
CONTRACTOR EXCHANGE OF INFORMATION FORM**

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

- Safety Data Sheets will be made available to any person not employed by the district upon their request.
- SDSs will be made available to all contract employees in order to inform them of the chemical hazards they are being exposed to.
- This is done so they can take necessary precautions in handling the substances.
- Necessary label and/or emergency precautionary information will be distributed to the other employer(s) by way of written statement once they arrive onsite.

Each contractor bringing chemicals on-site must provide the District Representative with the appropriate hazard information on these substances before work begins, including the SDS, the labels used, and the precautionary measures to be taken in working with these chemicals.

Exchange of Information

District Representative Signature & Date:



Contractor & Company Name & Date:

APPENDIX H

**MEDFORD AREA PUBLIC SCHOOL DISTRICT
HAZARD COMMUNICATION EVALUATION OF COMPLIANCE FORM**

Topic	Status	Corrective Action	Date
Has OSHA made any changes to the Hazard Communication standard in the last year?			
Has the written program been revised?			
Is the written program in need of revision?			
Has the annual SDS inventory been completed?			
Has the master SDS inventory list been revised and updated?			
Have the individual SDS lists been revised and updated?			
Does every chemical have a SDS?			
Is there a SDS binder in each work location?			
Is every chemical labeled?			
Have all employees hired within the last year received new employee hazard communication training?			
Have all applicable employees received refresher hazard communication training?			
Have all employees received applicable chemical specific training, including properties of the chemicals, safe handling procedures, & measures to take to protect themselves?			
Has training been revised to account for changes to the standard, new equipment, new procedures & new physical or health hazards which the employees have not previously been trained on, which have been introduced into the work area?			
Are employees using only the chemicals they have been trained on in each area?			
Has all Hazard Communication material been updated?			

Completed By: _____ Date: _____



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