

# Egg Harbor Township Board of Education Written Hazard Communication Program

## Policy and Administration

This notice is to inform you that our agency complies with the Public Employees Occupational Safety and Health Program Hazard Communication Standard (PEOSH HCS), N.J.A.C. 12:100-7, which New Jersey adopted with amendments on May 3, 2004. We provide information about the hazardous chemicals in our workplace, their associated hazards, and the methods for controlling these hazards. We have put in place the following required elements of the Standard:

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

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

Henry Rodrique, CEFM, located in the EHT Facilities Department, is the program coordinator who has overall responsibility for the written program and responsibility for the annual review and update of the written program. Henry Rodrique, CEFM also makes available the written program to employees upon their request within three days of the request.

As required under the PEOSH HCS, employees will be informed of the contents of this program, the location and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from the hazardous chemicals. This information will be provided during employee training sessions and/or safety meetings. Employees will also be informed of the hazards of non-routine tasks such as: Not applicable at this time.

## List of Hazardous Chemicals

The list of the hazardous chemicals in this facility is prepared by Henry Rodrique, CEFM. The list is continually updated and is included at the back of this program. Although not required by the PEOSH HCS, a separate list generated by the RTK Annual Survey is available for each work area. As new products are delivered, those hazardous chemicals are added to the list.

## Material Safety Data Sheets (MSDS) and Hazardous Substance Fact Sheets (HSFS)

MSDSs and HSFSs provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the MSDSs are made readily accessible during each work shift to employees when they are in their work area. Henry Rodrique, CEFM, Director of Facilities,

obtains MSDSs on all products containing hazardous chemicals and HSFs on all hazardous chemicals, places copies of the MSDSs in a binder in each work area of this facility, and maintains a master file of all the MSDSs and HSFs in his office. If additional information is needed about a hazardous chemical or product, if an MSDS is missing, or if an MSDS has not been supplied with the initial shipment, Henry Rodrique, CEFM will contact the manufacturer or supplier. The people listed below will ensure that the MSDSs kept in each work area are updated as needed and the MSDS binder is kept intact, and that HSFs are updated as needed. As a policy of this facility, an MSDS and HSFs hard copy will be provided to the requesting employee immediately upon request or within three working days of the request if the MSDS or HSFs is not immediately available.

Name	Work Area
Egg Harbor Township School Principal	Main Office Central File
Egg Harbor Township Board of Education School Business Administrator	Slaybaugh Primary Board of Education Offices Central File
Egg Harbor Township Director of Facilities	Facilities Department Offices Central File

Any new procedures or products that are planned to be used in this workplace must be approved by Henry Rodrique, CEFM before use to make sure that MSDSs and HSFs are obtained before use.

At this time, all MSDSs and HSFs are not available in an electronic form. As new technology becomes available, we will direct our PEOSH Employees to the website link.

### Labels and Warning Systems

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

- “ Stationary containers in an area with similar contents and hazards have signs posted on or above them to convey the hazard information.
- “ Employees transferring hazardous materials from a labeled container to a portable container intended only for their immediate use during the work shift, do not have to label the portable container. If the portable container is stored beyond the employee’s shift, or will be used by other workers, the employee labels the portable container with the PEOSH HCS information from the properly labeled larger container.

[Note to Employer: If you have an additional labeling system in use, such as National Fire Protection Association (NFPA) labels, this system should be explained in this section. If you should ship containers, an explanation of who will label the containers to be shipped and how the label will be affixed to the container should be discussed. Pipes or piping systems do not have to be labeled with PEOSH HCS labels, but the hazards of the materials contained in the pipes must be discussed during the PEOSH HCS training sessions.]

## Hazardous Non-Routine Tasks

Periodically, our employees are required to perform hazardous non-routine tasks such as:

Not applicable at this time.

When employees are required to perform the above hazardous non-routine tasks, a special training session is conducted to inform them about the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure. This special session is conducted by Henry Rodrique, CEFM prior to employees beginning the task. Employees who perform these non-routine tasks are notified about the training by their supervisor, and are required to attend the training.

## Employee Training

Every employee who works with or has the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies will receive initial and refresher training under the PEOSH Hazard Communication Standard on the safe use of those hazardous chemicals. Henry Rodrique, CEFM, located at the EHT Facilities Department, is responsible for providing the training. A training program that uses both audiovisual materials and classroom instruction has been prepared for this purpose.

[Note to Employer: An explanation of the training methodology used at your worksite must be specified in this area. OSHA has developed a sample hazard communication training program that may assist you with the development of your training program. OSHA's website is listed on the "Resources for Additional Information" page.]

- .. The trainer meets the definition of a technically qualified person.
- .. Whenever a new hazard is introduced into the work area, an **additional training session** is provided for workers in a scheduled safety meeting conducted by Henry Rodrique, CEFM prior to beginning work with the new hazardous material. Supervisors notify employees about the safety meetings.
- .. **Refresher training**, an abbreviated version of initial training, is conducted every two years. Area supervisors notify employees when the training session is scheduled, and a notice is placed on the bulletin board inside the break room.
- .. **Attendance is mandatory at all training sessions** for those workers identified as exposed or having the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies.
- .. Training is provided at no cost to the employee and is provided during working hours. The training is appropriate in content and vocabulary to the educational level, literacy and language of the employees.
- .. The documentation of training required by PEOSH HCS is maintained in EHT Facilities Department Office Central File.

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

The **initial training session** includes the following discussion items:

1. An explanation of the PEOSH Hazard Communication Standard and this written program;
2. Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity) and methods used in this workplace to detect the presence or release of hazardous chemicals (including the chemicals in piping systems);
3. Physical hazards of chemicals such as the potential for fire and explosion;
4. Health hazards (both acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using MSDSs and HSFSS;
5. Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks;
6. Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks;
7. The location of and responsible person for maintaining MSDSs, HSFSS, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;
8. An explanation of the applicable provisions of the Worker and Community Right to Know Act;
9. How to read and interpret the information on PEOSH HCS and RTK labels, HSFSS and MSDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL;
10. A copy of the RTK brochure is handed out during training.

[Note to Employer: If electronic MSDS and HSFS systems are used, include in the training an explanation of how employees can access the system and what to do if a backup MSDS and HSFS system is required. The hazards of the chemicals reviewed, using MSDSs and HSFSs, should reflect the actual hazardous chemicals used at your workplace.]

The initial and refresher training programs for employees are reviewed annually by the trainer, who will notify area supervisors of the training needs of their employees. As part of the assessment of the training program, input from employees regarding the training they have received and suggestions for improving the training are obtained through training evaluation forms. In addition, suggestions may be placed in the employees' suggestion box.

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

1. An explanation of any changes in the written program, PEOSH HCS, or RTK Act.
2. Changes in products used or work processes that may cause exposure to hazardous chemicals.
3. A review of health hazards, chemical and physical properties of the hazardous chemicals, and control methods of any routinely used hazardous materials and any new hazardous

materials to which the employees may be exposed. The MSDSs and HSFs will be used to review information on the hazardous chemicals.

4. A review of the facility's health and safety policy and procedure manual.
5. A copy of the RTK brochure is distributed.

### **Contractor Employees**

Henry Rodrigue, CEFM advises outside contractors in person of any chemical hazards that may be encountered in the normal course of their work on the site, the labeling systems in use, protective measures to be taken, the location and availability of MSDSs, HSFs, and other health hazard information, and the safe handling procedures to be used for these materials.

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

**All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS, applicable MSDSs and HSFs, and other chemical information from Henry Rodrigue, CEFM located in the EHT Facilities Department.**

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(Signature of Owner/Manager Representative)

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Title

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Date

## Resources for Additional Information

New Jersey Department of Health and Senior Services  
Public Employees Occupational Safety and Health Program  
P.O. Box 360  
Trenton, New Jersey 08625-0360  
(609) 984-1863  
<http://www.nj.gov/health/eoh/peoshweb>

New Jersey Department of Labor  
Division of Public Safety and Occupational Safety and Health  
P.O. Box 386  
Trenton, New Jersey 08625-0386  
(609) 633-2587  
<http://www.nj.gov/labor/Isse/Ispeosh.html>

U.S. Department of Labor  
Occupational Safety and Health Administration (OSHA)  
<http://www.osha.gov>

### **For information about the Right to Know law, contact:**

New Jersey Department of Health and Senior Services  
Right to Know Program  
P.O. Box 368  
Trenton, New Jersey 08625-0368  
(609) 984-2202  
<http://www.nj.gov/health/eoh/rtkweb>

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