

VIRGINIA SCHOOL FOR THE DEAF AND THE BLIND

<i>TITLE: Hazard Communication Plan</i>	POLICY NUMBER: G019.4
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Policy Statement:

It is the policy of The Virginia School for the Deaf and the Blind (VSDB) to take all reasonable steps to inform employees of the presence of any hazardous chemicals, and to provide adequate training in the safe use, storage, and disposal of such substances. Only approved chemicals purchased by VSDB are permitted on the VSDB Campus. Ordinary household chemicals are not permitted to be brought onto the VSDB Campus without prior approval by VSDB administration. This policy is established to meet the requirements of the OSHA standard 29 CFR 1910.1200. All departments and sections of the school are included within this plan.

Table of Contents:

- I. Hazardous Chemicals Inventory List
- II. Hazard Determination
- III. Safety Data Sheets
- IV. Labels and Other Forms of Warning
- V. Employee Information and Training
- VI. Non-routine Tasks
- VII. Unlabeled Pipes
- VIII. On-site Contractors
- IX. Plan review and maintenance

I. Hazardous Chemical Inventory List:

A master list of all known hazardous chemicals (products) used at the VSDB is located on the VSDB Web site.

All department heads will ensure the list of hazardous chemicals used and/or stored within their facilities is updated annually and provided to the Safety Officer for inclusion in the master list.

II. Hazard Determination:

All hazardous chemicals in this facility are purchased materials; there are no manufactured or intermediate chemicals provided by the school. Therefore, the school shall rely on the hazard determination made by the chemical manufacturer as indicated on their SDS.

III. Safety Data Sheets (SDS):

A complete file of SDSs for the hazardous chemicals to which employees and students of the school may be exposed will be kept in the Facilities and Engineering Department. Available electronic copies of the SDS 's are accessed by clicking on the link provided on the VSDB SharePoint site, under the Safety Data Sheet Inventory tab, then Safety Data Sheets.

The purpose of the SDS is to provide basic information to personnel who are or may be exposed to the hazards presented by the chemicals in use on the facility. The basic information contained in each SDS should include:

- The identity of the product used on the package or container label
- Physical and chemical characteristics, such as vapor pressure or flash point
- The physical hazards, including the potential for fire, explosion, reactivity
- The primary routes of entry – how does it get into your body systems
- The OSHA permissible exposure limits – how much you can be exposed to without adverse reactions
- Whether the chemical is listed as a carcinogen (cancer causing agent)
- Applicable general precautions for safe handling
- Generally applicable control measures such as: needed engineering controls; work practices; or personal protective equipment (PPE)
- Emergency and first aid procedures
- The date of preparation of the SDS (is it current?)
- The Name, address, and telephone number of the manufacturer or responsible party for information about the SDS

When a chemical is ordered, the school shall specify on the purchase order that chemicals are not to be shipped without a corresponding SDS. Upon arrival, the SDS will be forwarded to the Safety Officer for review and inclusion in the system. Should the SDS be deemed incomplete, the Safety Officer will immediately contact the manufacturer or vendor and request additional information.

The master SDS sheets will be compared to the updated inventory list annually. A replacement SDS will be requested from the manufacturer for any SDS that has not been updated within the last three years.

IV. Labels and Other Forms of Warning:

The Hazard Communication Standard requires that the hazardous chemicals be labeled by the manufacturers. The label must contain at least the following:

- Chemical identity
- Appropriate hazard warnings
- Name and address of the manufacturer, importer, or other responsible party

Upon delivery of chemicals, the school will ensure that proper labels are attached. Any chemical without proper labeling will not be accepted.

Personnel must not deface or remove the manufacturer's label from any container. Should the labels become worn and not legible, either accidentally or through normal use, the user must re-label the container per the procedure below for secondary containers.

Chemicals may be transferred from the manufacturer's container to secondary containers for immediate use without having to label the secondary container. This would apply to buckets and mop buckets used in the cleaning and housekeeping process, etc.

If a chemical is transferred to a secondary container (such as a spray bottle) and will not be immediately consumed, the secondary container must be labeled with the following as a minimum:

- Identity of the hazardous chemical contained therein
- Product name
- Appropriate hazard warnings to provide general information regarding the hazards of the chemicals

V. Employee Information and Training:

Prior to starting work, new employees of VSDB will attend orientation training. Included in the orientation will be general training for safety and health. This training will include an overview of the school hazard communication plan. Additional department and work specific training will be presented by the employee's supervision.

The general hazard communication (Haz Com) training will include:

- An overview of the requirements of the Haz Com standard
- How to review an SDS and where to access them
- General physical and health effects of hazardous chemicals
- Steps the school has taken to lessen or prevent exposure to chemicals
- Safety and emergency procedures to follow if exposure occurs
- Location of the written plan

Supervision in the employee's work area will provide training as follows:

- Location of the department specific SDS binder(s)
- Inventory of hazardous chemicals of the respective department
- Physical and health effects of the chemicals the employee will be exposed to while performing work
- Specific engineering controls, job procedures/work practices, and PPE required
- Additional training whenever a new chemical or hazard is introduced into the work area.

Supervision shall lead a hazard assessment whenever a new chemical or process is to be used in the work area. The Safety Officer will research the chemical involved and assist supervision with written procedures and PPE designations.

VI. Non-routine Tasks:

Prior to any employee beginning a hazardous, non-routine task, supervision and the Safety Officer shall determine the hazards involved through a hazard assessment or job safety analysis process. Procedures, controls and any necessary PPE will be determined and provided prior to the work commencing.

VII. Unlabeled Pipes:

The school does have pipes that carry chemicals or pose other hazards. These pipes are not required to be labeled; however, personnel need to be aware of the hazard. Piping on the school campus includes:

- Water
- Hot water
- Natural Gas
- Propane
- Sewer
- Hydraulic oil

Maintenance personnel and authorized contractor employees are the only persons permitted to work on any pipe, pipe hangers, or the appliances they may be connected to. No one shall hang or suspend anything from facility piping without prior approval of the Facility Engineer or the Safety Officer.

Questions concerning piping and its contents should be referred to the Facilities Department, or the Safety Officer.

VIII. On-Site Contractors:

Contract companies (contractors) will periodically perform work on the school campus. The school and all contractor companies shall participate in the management of this plan.

The school shall:

- Provide information as to any hazardous chemical the contractor employees may be exposed to, including the location and access to the appropriate SDSs
- Precautions to protect employees during normal operating conditions and emergencies
- Any labels in use that are not manufacturer supplied

The Contractor shall:

- Provide to the school's Facilities Engineer or the Safety Officer an SDS prior to the introduction of any hazardous chemical to the campus
- Have a site approved job plan to protect employees and students from any work activities, to include emergency procedures and notifications
- An explanation of any non-manufacturer labeling system in use by the contractor
- Participate in routine progress and safety meetings as necessary.

IX. Program Review:

Each department head will assign an employee to manage the Hazard Communication Plan for their organization. Duties will include the annual inventory and maintenance of their respective SDS binders.

The chemical inventory list for each department will be updated annually and submitted to the Safety Officer for inclusion in the master list for the school by October 30. The Safety Officer shall review the lists and determine that a corresponding SDS for each chemical listed is available and accessible to all employees. The Hazard Communication Plan shall undergo a complete review every three years.

<p><i>Rescission:</i> Effective Date: May 20, 2011; Revised: July 2016 BOV Approved: March 23, 2017; Revised: October 8, 2018; Reviewed: October 24, 2019</p>
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