

HAZARD COMMUNICATIONS COMPLIANCE POLICY AND PROCEDURE

PURPOSE

Bay-Arenac ISD has established a Right-to-Know Program to provide a safe and healthful work environment for all employees and students that comply with applicable federal and state requirements on hazard communication with respect to our facilities. It is the desire of these facilities to continue to strive towards a working environment free of hazards and towards educated employees working knowledgeably and safely with known hazards in their workplace.

APPLICATION

This procedure shall apply to all administrators regardless of their location. The ISD shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their assignment and as new potential hazards are introduced to those areas.

For the purpose of this program, the term “employee” shall include volunteers, full-time employees, part-time employees, contractors and students who perform work in the areas where hazardous materials are likely to be encountered.

DEFINITION

A. Hazard Determination

1. Bay Arenac ISD will rely on Material Safety Data Sheets (MSDS) from material suppliers to meet hazard determination requirements. Hazardous materials are defined to be those items listed in state laws and regulations regarding the transportation, use and storage of hazardous materials.
2. Each department administrator shall be responsible for the safe use and storage of materials found within his/her area as stated in the MSDS.

B. Labeling

1. The Building Operations Supervisor or his /her designee will ensure that all hazardous materials accepted by Bay-Arenac Career Center’s receiving area are properly labeled.
2. All incoming containers shall be checked for: identity, hazard warning, and name and addresses of responsible party (manufacturer, distributor, supplier).

3. The Building Operations Supervisor will conduct periodic inspections of Bay-Arenac ISD facilities.
4. Building Administrators shall be responsible for ensuring that all portable containers used in their work area are labeled with identity and hazard warning. Administrators are responsible for reporting any new material defined as “hazardous” to the Building Operations Supervisor.
5. Employees shall not remove or deface existing labels on hazardous materials containers unless the label is replaced with an appropriate label as stated above.

C. Material Safety Data Sheets (MSDS)

1. The Building Operations administrator will be responsible for compiling the master MSDS file, which shall be maintained in the Building Operations Office, along with other safety resource materials. The file will be made available to all employees at their request.
2. Building Administrators shall be responsible for maintaining copies of MSDS for all hazardous materials utilized by their buildings. Copies of MSDS and MIOSHA required posters shall be obtained from the Building Operations Secretary.

D. Employee Information and Training

1. Bay-Arenac ISD shall provide employees with information and training on hazardous materials in their work areas at the time of their initial assignment, when a new hazard is introduced into their work area, and when non-routine tasks involving the use of a hazardous material is assigned.
2. Training in Right-to-Know will be conducted on an annual basis by the Staff and Organizational Development Department. Documentation will be maintained by the Staff and Organizational Development Department.
3. The Staff and Organizational Development Department will begin training during New Employee Orientation and prior to commencement of job activities involving the use of hazardous materials.
4. The training program shall include the following:

- a. Bay-Arenac ISD Right-to-Know policy.
- b. Information about where hazardous materials and the MSDS are found within the building.
- c. How to read and interpret labels and MSDS.
(See Attachment A)
- d. Procedures and work practices to follow while utilizing each specific hazardous material.
- e. Methods to detect the presence or release of hazardous materials in the work area (such as monitoring conducted by Bay-Arenac ISD and other outside agencies, continuous monitoring devices, visual appearance and /or odor of hazardous materials when released.
- f. Procedures to follow if exposed to hazardous materials.
- g. Measures employees shall take to protect themselves from both physical and health hazards including appropriate emergency procedures and spill plans, and proper personal protective equipment.
- h. Proper disposal methods for hazardous materials.

E. Responsibilities

1. Employees

- a. Employees are required to participate in Hazardous Materials training as requested by the Superintendent/designee.
- b. Employees will not be permitted to accept, utilize, or transport, for any reason, hazardous material owned by or attributed to the school system without prior approval from the Superintendent/designee.

2. Administrators

- a. When administrators believe that they have materials, which may qualify as hazardous, and there is no immediate need, they will contact Building Operations for disposal. Only Building

Operations will be authorized to declare materials to be waste, excess, or surplus, and to order their disposal.

- b.** The administrator will develop and implement an evacuation plan for each location. In developing the evacuation plan, consideration will be given to the location and the types of hazardous materials present at that location.
- c.** The administrator will conduct an evacuation drill at least once each school year at each location. Where possible, this plan will be coordinated with existing fire drills, bomb threats evacuation plans, and tornado drills, and may be conducted in conjunction with any of these other drills. Written records of the drill will be maintained at each location and a copy of the documentation will be maintained by the Staff and Organizational Development Department.

3. Building Operations

- a.** When a site/location has a substance which qualifies as hazardous material and which may require disposal, Building Operations will be contacted to arrange for storage, transfer, or disposal as appropriate. Materials no longer needed at one location may be available for transfer within the district to other programs or locations.
- b.** Building Operations will ensure storage of hazardous materials will be in compliance with local, state and federal law. Hazardous materials will be separated and labeled according to hazardous characteristics and stored safely in storage areas appropriate to the risk posed by the materials. Where appropriate, lockable storage cabinets will be installed and access to students or non-authorized staff limited.
- c.** The Building Operations Supervisor shall develop a plan to handle spills and leaks of hazardous materials. The plan will address immediate emergency procedures, required notification, and clean-up procedure and will comply with applicable laws and regulations. Information regarding a hazardous material incident will be released only by the Superintendent/designee.
- d.** Transportation of hazardous materials will meet applicable local, state, and federal requirements and will be coordinated by Building Operations. Once a hazardous material is under school system control, each location controlling the material

will be responsible for the material until it is passed to the control of personnel responsible for removal. Building Operations will verify that the transportation used meets local, state and federal transportation requirements.

4. Staff and Organizational Development

- a.** Staff and Organizational Development will develop an emergency response plan that will enable school system employees to take appropriate action to protect students, staff, the general public and school system property, when there is an incident involving hazardous material. This plan will comply with applicable laws and regulations and will be coordinated with the school system evacuation plans and copy of which will be on file with the Superintendent.
- b.** Staff and Organizational Development will ensure copies of the evacuation plan be posted within the buildings as appropriate for the location. Copies of the evacuation plan will be maintained by the building administrator. The evacuation plan will be coordinated with the Critical Incident Coordinator, fire department, and police department.

5. Business Office

- a.** Purchase orders for hazardous materials will include a requirement that the shipment of any such materials include MSDS with any order or portion of the order. Purchase orders also will note that failure to provide MSDS with the shipment may result in either the school system refusing to accept the shipment.

6. Outside Contractors

- a.** The Building Operations Supervisor shall provide contractors working at the facility and their employees with the following information prior to entering the work site upon request:
 - i.** Hazardous materials to which they may be exposed to while on the job site
 - ii.** Measures contracted employees may take to lessen the risk.

ATTACHMENT A

A. MSDS and Label interpretation.

1. MSDS contain the following information:

- a. Chemical identification
- b. Hazardous ingredients
- c. Physical data
- d. Fire and explosion data
- e. Health hazards
- f. Reactivity data
- g. Spill or leak procedures
- h. Special precautions
- i. Special protections

2. The Label usually contains the following information:

- a. Basic warning
- b. First aid
- c. Fire hazard
- d. Protective equipment
- e. Color coding
 - i. Blue – health or toxicity
 - ii. Red – flammability
 - iii. Yellow – reactivity
 - iv. White – personal or special protection
- f. Number coding
 - i. 0 = insignificant risk
 - ii. 1 = slight risk
 - iii. 2 = moderate risk
 - iv. 3 = high risk
 - v. 4 = extreme risk