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# HAZARD COMMUNICATION PROGRAM

IN ACCORDANCE WITH OSHA 29 CFR 1910.1200



GHS





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## HAZARD COMMUNICATION PROGRAM

### Introduction

Detroit Public Schools is committed to providing a safe environment for students, staff and visitors. This Hazard Communication Program is intended to ensure compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200. In 2012, OSHA revised the HCS to align with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. As a result, this program has been updated to align with the Globally Harmonized System of Classification and Labeling of Chemicals.

This program applies to all work related operations of the Detroit Public Schools where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.

### Purpose

Under this program, DPS employees will be informed about the hazards of chemicals with which they work and measures to take to protect themselves. This program is essential to implementing and complying with the regulations and addressing:

- Safety Data Sheet (SDS)
- Labels
- Hazardous chemical inventory
- Training

### Roles and Responsibilities:

- **Office of Risk Management** is responsible for:
  - ✓ Development and revision of the Hazard Communication Program
  - ✓ Compliance review
  - ✓ Consultation as needed in matters of training and SDS interpretation

- **Principal or designee** is responsible for:
  - ✓ Ensuring that employee attend hazard communication training.
  - ✓ Ensuring that a list of hazardous chemicals used by their employees is maintained.
  - ✓ Ensuring that SDSs are accessible for every hazardous chemical on their school's inventory list.
  
- **Employees** who work with hazardous chemicals are responsible for:
  - ✓ Attending required training.
  - ✓ Reading SDSs and labels prior to using hazardous chemicals.
  - ✓ Following safety instructions contained in the SDS and on labels.
  - ✓ Following chemical labeling procedures.
  - ✓ Informing their principal when inadequate labeling or SDSs are missing.

## Labeling of Hazardous Chemicals (GHS Format)

Labels provide employees with an immediate source of information and should not under any circumstances be removed or defaced. Generally speaking, it is the manufacturer's responsibility to label all hazardous chemicals shipped out of the company's facility. However, if a hazardous chemical is transferred from a large container to a smaller (secondary) container, or a label falls off, you may find it necessary to produce a label. As of June 1, 2015, all labels will be required to have the following:

- **Product identifier** – provides a means by which to identify the chemical.
- **Signal word** – DANGER, WARNING
- **Hazard statement(s)** – fatal if swallowed, toxic if swallowed, etc.
- **Precautionary statement(s)** – response in cases of accidental spillage, exposure, etc.
- **Supplier identification** - name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- **Pictogram(s)** – toxicity, flammables, explosives, carcinogens, respiratory hazard, oxidizers, etc.

## GHS Label

**The Basic Parts of A GHS-Compliant Label**

**1** → **n-Propyl Alcohol**  
UN No. 1274  
CAS No. 71-23-8

**2** → **DANGER**

**3** → Highly flammable liquid and vapor. Causes serious eye damage. May cause drowsiness and dizziness.

**4** → Keep away from heat/sparks/open flames/hot surfaces. No smoking. Avoid breathing fumes/mist/vapours/spray. Wear protective gloves/protective clothing/eye protection/face protection. In case of contact: rinse cautiously with water for several minutes. Remove contact lenses if present. Continue rinsing.

**5** → Fill Weight: 18.65 lbs. Lot Number: B56754434  
Gross Weight: 20 lbs. Fill Date: 6/21/2013  
Expiration Date: 6/21/2020  
Acme Chemical Company - 711 Roadrunner St. - Chicago, IL 60601 USA - www.acmechem.com - 123-444-5567

See SDS for further information.

**6** →

- Product Identifier** - Should match the product identifier on the Safety Data Sheet.
- Signal Word** - Either use "Danger" (severe) or "Warning" (less severe)
- Hazard Statements** - A phrase assigned to a hazard class that describes the nature of the product's hazards
- Precautionary Statements** - Describes recommended measures to minimize or prevent adverse effects resulting from exposure.
- Supplier Identification** - The name, address and telephone number of the manufacturer or supplier.
- Pictograms** - Graphical symbols intended to convey specific hazard information visually.

Sample label courtesy of Weber Packaging Solutions • www.weberpackaging.com

*Labels on incoming containers of hazardous materials shall not be removed or defaced.*

## Portable (Secondary) Containers

When transferring a chemical from one container to another, or replacing a damaged label, employees are required to label the container to include appropriate hazard warnings using the GHS label format.

## Pipes and Piping Systems

Pipes and systems containing hazardous chemicals should be labeled showing the contents and hazards of the chemical wherever these pipes/systems are accessible. Employees who routinely work in these areas shall be informed of the potential hazards by their administrator/supervisor.

## Safety Data Sheet

The Safety Data Sheet (SDS) (formerly known as Material Safety Data Sheet or MSDS) is an informational document that contains relevant information about the hazards of a specific chemical. MIOSHA requires that copies of SDSs for hazardous chemicals be readily accessible to employees at each work site and during each work shift. If you do not have a current SDS, you will need to request a SDS from the manufacturer.

As of June 1, 2015, the HCS will require new SDS to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

**Section 1, Identification** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

**Section 2, Hazard(s) identification** includes all hazards regarding the chemical; required label elements.

**Section 3, Composition/information on ingredients** includes information on chemical ingredients; trade secret claims.

**Section 4, First-aid measures** includes important symptoms/effects, acute, delayed; required treatment.

**Section 5, Fire-fighting measures** lists suitable extinguishing techniques, equipment; chemical hazards from fire.

**Section 6, Accidental release measures** lists emergency procedures; protective equipment; proper methods of containment and cleanup.

**Section 7, Handling and storage** lists precautions for safe handling and storage, including incompatibilities.

**Section 8, Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PELs); ACGIH Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the SDS where available as well as appropriate engineering controls; personal protective equipment (PPE).

**Section 9, Physical and chemical properties** lists the chemical's characteristics.

**Section 10, Stability and reactivity** lists chemical stability and possibility of hazardous reactions.

**Section 11, Toxicological information** includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information\*

Section 13, Disposal considerations\*

Section 14, Transport information\*

Section 15, Regulatory information\*

**Section 16, Other information**, includes the date of preparation or last revision.

*Employers must ensure that SDSs are readily accessible to employees*

## Chemical Inventory & Hazard Reduction

Each school that uses hazardous chemical products is required to keep a written inventory at their location. Continuous efforts shall be taken by each school/department to substitute to less hazardous chemicals whenever feasible or eliminate the hazardous chemical and/or process to significantly reduce health and safety hazards in the workplace.

### Suggestions for Creating a Chemical Inventory List

- Create a spreadsheet and complete each section as listed:
  - ✓ Inventory taken by: List the name of the person who conducted the inventory
  - ✓ School Name
  - ✓ Phone number
  - ✓ Date inventory initially compiled
  - ✓ Date of most recent revision
  - ✓ Supervisor/administrator
  - ✓ Product/chemical name as it appears on the container label
  - ✓ Maximum quantity to be stored
  - ✓ Location of product in the building

<u>Example</u>		
Chemical Inventory List		
<i>Inventory Taken by:</i> <b>John Jones</b>		<i>Date inventory initially compiled:</i> <b>02/28/14</b>
<b>School Name:</b> <b>ABC Academy</b>	<b>Date of most recent revision:</b> <b>02/28/15</b>	
<b>Phone:</b> <b>313/123-4567</b>	<b>Supervisor:</b> <b>Bill Smith</b>	
Product/Chemical Name	Maximum Quantity*	Location*
Acetone	2 gallons	Classroom #307A
Mineral Spirits	1 gallon	Classroom #208
Sulfuric Acid	2 gallons	Storage room #107

## Training

Employers shall provide employees who are exposed to hazardous chemicals with 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 on is introduced into their work area.

### Employees shall be informed of:

- 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 safety data sheets.

### Employee training shall include at a minimum:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area, such as, visual appearance, odor of hazardous chemicals when being released, etc.
- 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;
- The measures employees can take to protect themselves from these hazards, including specific procedures the employer 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 employer, including an explanation of the labels on containers, safety data sheets, and how employees can obtain and use the appropriate hazard information.
- The determination of which employees will receive Hazard Communication Training will be based upon their exposure. Those employees who have potential as well as actual exposure to hazardous chemicals will receive training. ***Employees who do not work with hazardous chemicals will not be required to attend Hazard Communication Training. For example, most administrative positions.***

Schools must contact the Office of Risk Management and help coordinate new employee training. A combination of audiovisual and written materials are used for training. Employees are informed of the location of the written hazard communication program, hazardous chemical inventory list, SDS, how they can obtain a copy of a SDS, and how they can protect themselves from over-exposure to these chemicals and how to read and understand a SDS. Training records must be maintained centrally and/or at the individual sites.

## Exemptions

The law has special provisions for certain specific situations. These special situations are:

- **Laboratories** - Laboratories are covered by a separate workplace-specific standard, Occupational Exposure of Hazardous Chemical in Laboratories (29 CFR 1910.1450) and Part 431, Chemical Hygiene Plan. Also exempt from the Hazard Communication Standard are chemical products typically found in households, *if they are not used with more frequency than typically used in a household setting*. Examples of these may include dish detergent occasionally used in a break room, or glass cleaner used to occasionally clean work surfaces.
- **Sealed Containers** - Operations such as warehousing, where employees handle only sealed containers are generally exempt. However, the following aspects of the Hazard Communication Program will apply:
  1. Labels on incoming containers are not to be removed or defaced.
  2. SDSs that are received with new products must be kept and maintained.
  3. The department will provide information and training sufficient to protect employees from hazards presented by the contents of sealed containers should they spill or leak.

## Contractors and Non-DPS Employees

Contractors and non-DPS employees bring hazardous chemicals on site are responsible for providing SDSs. DPS employees working in the vicinity of the contractor's work site may review the contractor's SDSs. In turn, SDSs of DPS's chemicals used at the work site may be reviewed by the contractor's employees.

## Hazardous Non-routine Tasks

On occasion, employees are required to do work in hazardous areas (i.e. confined spaces, non-routine cleaning of equipment and tanks containing a hazardous chemical). Prior to starting work in such areas, each employee must be given information about the hazards involved in these activities.

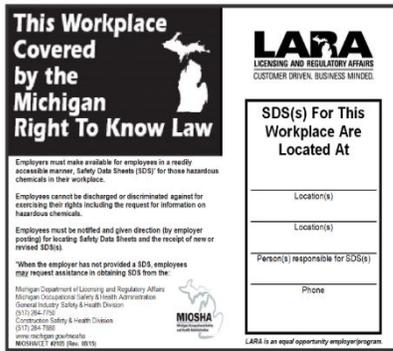
**This information will include:**

- Specific chemical hazards
- Protective/safety measures the employee can take to lessen risks
- Measures the organization has taken to lessen the hazards including ventilation and personal protective equipment
- Emergency procedures

**Posting Requirements**

The Michigan Right-to-Know (RTK) posters that can be used to meet the posting requirements of the standard are CET-2105 and CET-2106. The first poster (CET-2105) is designed to serve as a reminder to workers of their rights under the Michigan Right to Know Law and to provide information on how to locate SDSs and the RTK program for the worksite. The second poster (CET-2106) informs workers of any changes recently made to one or more SDS. Whenever you receive an updated Safety Data Sheet, you must provide the necessary information on the poster within 5 days of receipt and display it in a prominent manner for a minimum of 10 days.

CET-2105



CET-2106



## Regulatory Reference:

Occupational Safety and Health Administration (OSHA) standard (29 CFR 1910.1200) was adopted by the Michigan Right to Know Law - Part 42, 92 and 430. Hazard Communication.

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