



WRITTEN HAZARD COMMUNICATION PROGRAM KENILWORTH BOARD OF EDUCATION

INTRODUCTION

POLICY:

It is the policy of Kenilworth Board of Education to be in full compliance with all applicable Public Employees Occupational Safety and Health (PEOSH) requirements including the Hazard Communication Standard N.J.A.C. 12:100-7, which New Jersey adopted with amendments on May 3, 2004, as well as other State environmental requirements including the Worker and Community Right To Know Act. Kenilworth Board of Education will provide information about the hazardous chemicals in our workplace, their associated hazards, and the method for controlling these hazards. We have put in place the following required elements of the Standard:

1. A list of hazardous chemicals (NJ Right To Know Survey) inventory list
2. Safety Data Sheets (SDS) for all products containing hazardous chemicals
3. Hazardous Substance Fact Sheets (HSFS) for all hazardous chemicals;
4. Appropriately labeled containers;
5. Conducted training for employees who work with or have a potential for exposure to hazardous chemicals

OBJECTIVE:

The objective of this Written Hazard Communication Program is to disseminate effectively to all involved employees their rights and responsibilities under the Hazard Communication Standard and to ensure full compliance.

PURPOSE:

- To satisfy legal requirements promulgated by both State and Federal governments.
- To insure the provision of an education and training program with respect to each hazardous chemical to which an employee is routinely exposed during the course of employment.
- To ensure that job performance reflects training and safe handling practices.
- To promote the health and safety of co-workers as well as visitors to our facilities.

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HAZARD DETERMINATION

Kenilworth Board of Education has chosen to use the Safety Data Sheets ("SDS") provided by the chemical manufacturer or importer in order to properly evaluate the hazard(s) associated with the substances located on-site. Kenilworth Board of Education has identified all hazardous substances and requested a Safety Data Sheet these products. Kenilworth Board of Education will ensure that the SDS kept in each work area is updated as needed and the SDS binder is kept intact, and the HSFS are updated as needed via the internet.

Documentation for all SDS requests and contacts with manufacturers/distributors is located at the master central file for the facility.

After determining, from the SDS, the chemical contents of each product used on-site, the following sources were used to establish a list of hazardous substances:

- Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH).
- National Toxicology Program (NTP), Annual Report on Carcinogens, third edition, National Toxicology Program, Public Health Service, U.S. Department of Health and Human Services.
- IARC: Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Human, 1982, International Agency for Research on Cancer, World Health Organization.
- OSHA: 29 CFR Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration.

In addition to using the above lists to make a hazard determination, this organization has also used twenty-three OSHA defined physical and health hazards. OSHA has also determined that a hazardous chemical is one that is related to the physical characteristics of a chemical, as well as the health hazard it might pose. Some examples are listed below.

PHYSICAL HAZARDS:

A physical hazard is a hazardous effect that a chemical may have on its surrounding environment.

Examples of these are combustible liquids, compressed gas, explosives, flammables, and organic peroxides, oxidizers, pyrophoric and reactive.

HEALTH HAZARDS:

A health hazard is a chemical for which there is significant scientific evidence that acute or chronic health effects may occur as a result of exposure. Examples of these are carcinogens, teratogens, mutagens, irritants, corrosives, sensitizers, hepatotoxins, neurotoxins, agents which react on the hematopoietic system, agents which damage the lungs, skin, eyes, or mucous membranes.

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SAFETY DATA SHEETS (SDS) & HAZARDOUS SUBSTANCE FACT SHEETS (HSFS)

SDS and HSFS provide health and safety information on the specific hazardous products or chemicals which Kenilworth Board of Education employees may use in the workplace. In compliance with the PEOSH Hazard Communication Standard, the SDS are made readily accessible during each work shift to employees when they are in their work area. **The Hazard Communication Coordinator and/or his/her designee will distribute hardcopies of SDS & HSFS (immediately upon request or within 5 working days of the request if the SDS or HSFS is not immediately available) to all employees who make a request to view them.** Employees are notified during education and training, of the availability of SDS and HSFS in the Central File and their right to access them. A full explanation of the SDS and HSFS, including usage is required as part of the education session.

The Hazard Communication Coordinator will work with staff responsible for acquiring updated SDS and HSFS. Kenilworth Board of Education will inventory the work areas yearly, and cross check all acquired SDS and HSFS to assure that they are on file and up to date. If there are SDS and HSFS that are not up to date, requests will be made by Kenilworth Board of Education and the files will be updated.

Central File — Kenilworth Board of Education will maintain a complete Central File, in each facility that includes site-specific inventories of hazardous chemicals, SDS, and HSFS and the location of training documentation. Each work site will have available a site specific set of documents to include the site hazardous substances inventory and supporting SDS, HSFS and other New Jersey Right to Know Hazardous Substance List which will be available to employees while they are at this facility. Those employees who need information on specific chemicals while working away from their facility may radio or phone for information and a supervisor will either provide the information by fax or arrange for a copy to be delivered to the remote site.

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INITIAL TRAINING:

Each employee sent to initial training received an explanation of the employee manual on the law, received an explanation on the NJ RTK Brochure, viewed a comprehensive slide or audiovisual presentation, and received lectures as well as handouts/exercises on a number of topics. Included among these subjects were the following:

- An explanation of the PEOSH Hazard Communication Standard and this written program;
- 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);
- Physical hazards of chemicals such as the potential for fire and explosion;
- 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 SDS and HSFS;
- Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personal protective equipment (PPE), and procedures for emergency response to spills and leaks;
- Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks;
- The location of and responsible person for maintaining SDS, HSFSs RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;
- An explanation of the applicable provisions of the Worker and Community Right To Know Act;
- How to read and interpret the information on PEOSH HCS and RTK labels, HSFS and SDS, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL;
- Information on the contents of the RTK brochure is discussed.

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HAZARDOUS MATERIALS LABELING SYSTEM

David Brearley High School is a facility, which uses hazardous substances. The Hazard Communication Coordinator or his/her designee shall be responsible for ensuring that each container of hazardous chemicals in this workplace are properly labeled per the requirements of the PEOSH Hazard Communication Standard, and update the labels as necessary should they become illegible, fall off the container, or obscured in any matter. In addition, the Hazard Communication Coordinator will ensure that containers, which do not bear a PEOSH Hazard Communication Standard label, are not accepted by the facility at the time of purchase.

If an employee uses hazardous chemicals that need to be placed in a secondary container and stored for longer than the length of the work shift, it will be the responsibility of the Hazard Communication Coordinator to ensure employees make certain these secondary containers are properly labeled with the product/chemical name and any hazard warning that is present per the PEOSH Hazard Communication Standard.

If required under New Jersey Community Right to Know labeling regulations, the Hazard Communication Coordinator must ensure that proper labeling is provided (i.e. chemical name and CAS #).

Per the requirements of the PEOSH Hazard Communication Standard, stationary containers in an area with similar contents and hazards may have signs posted on or above them to convey the hazard information.

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APPENDIX A - RESPONSIBLE PERSON(S)

HAZARD COMMUNICATION COORDINATOR

NAME: Vincent Gonnella

TITLE: Business Administrator

PHONE #: (908)276-1644 Ext 1528

ASSISTANT HAZARD COMMUNICATION COORDINATOR

NAME: Christopher Caponegro

TITLE: Supervisor of Building and Grounds

PHONE #: (908)931-9696 Ext 2329

CENTRAL FILE LOCATION

LOCATION: Main Office

HAZARDOUS MATERIAL LISTING LOCATION

LOCATION: Central File

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APPENDIX C - SAMPLE SDS REQUEST LETTER

Dear Sir/Madam:

To properly comply with the PEOSH Hazard Communication Standard (N.J.A.C. 12:100-7), we are requesting that your firm provide us with a Safety Data Sheet (SDS) on the following product (s):

Employers are required to maintain SDSs and to label all containers with the names and CAS numbers of all hazardous substances as well as the five most predominant ingredients present in each container. This includes non-hazardous substances.

If you require further clarification, please feel free to contact me, as we are in urgent need of this information in order to comply with reporting deadlines.

Thank you for your cooperation.

Sincerely,

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APPENDIX E - SAMPLE PURCHASE ORDER & SERVICE CONTRACT LANGUAGE

Dear Sir/Madam:

All products supplied to Kenilworth Board of Education, under any contracts, shall comply with the Worker and Community Right To Know Act (N.J.S.A. 34:5A-1 et seq.) by providing a Safety Data Sheet for each product and, further complying with the Uniform Labeling requirement on each product container and package before delivery. New Jersey manufacturers are required to include New Jersey Right To Know labeling on all containers.

The New Jersey RTK labeling as a term or condition of our purchasing contract require all direct use containers to bear a label indicating the chemical name(s) and Chemical Abstracts Service number(s) of all hazardous substances in the container, and all other substances which are among the five most predominant substances in the container, or their trade secret registry number(s). (N.J.A.C. 8:59-5)

"Container" means a receptacle used to hold a liquid, solid or gaseous substance such as bottles, bags, barrels, cans, cylinders, drums and cartons. (N.J.A.C. 8:59-1.3)

Please refer to the New Jersey Department of Health and Senior Services Right to Know Program at <http://www.state.nj.us/health/eoh/rtkw'eb/documents/rtklbl.pdf> for assistance in developing proper labels.

This is an important and irrevocably part of our compliance program. All deliveries that do not meet this requirement will be returned to shipper.

Thank you for your cooperation.

Sincerely,