

Hazard Communication Program

New Lebanon Central School District

The New Lebanon CSD is complying with the requirements of OSHA/PESH's Hazard Communication Standard for construction by compiling a list of hazardous chemicals, using SDS's, ensuring that containers are labeled, and training our workers. In addition, we provide this same information to subcontractors involved in a specific project so that they may provide this information and train their employees.

This program applies to all work operations in our school district where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

The Business Official, Kevin Fottrell, is the program coordinator, who has overall responsibility for the program. Mr. Fottrell will review and update the program, as necessary. Copies of the written program may be obtained from the district office.

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS, and chemical information lists from the district office. Under this program, our employees will be informed of the contents of the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. Our employees will also be informed of the hazards associated with chemicals in unlabeled pipes.

If after reading this program, you find that improvements can be made, please contact the Business Official, Kevin Fottrell. We encourage all suggestions because we are committed to the success of our written hazard communication program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Hazard Evaluation Procedures

Our chemical inventory (Appendix A) is a list of hazardous chemicals known to be present in our workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facility.

Questar BOCES will assist in the update of the inventory as necessary.

Each building maintains the chemical inventory list in its office.

The school district does not manufacture any chemicals and, therefore, does not make any hazard determinations.

After the chemical inventory is compiled, it serves as a list of every chemical for which an SDS must be maintained.

Safety Data Sheets (SDS)

The SDS's we use are fact sheets for chemicals which pose a physical or health hazard in the workplace. SDS's provide our employees with specific information on the chemicals they use. Any employee may request SDS's at their facility. All new procurements for the school district must be cleared by the Business Official or their designee.

Container and Pipe Labels and Other Forms of Warning

Labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The chemical identity is found on the label, the SDS, and the chemical inventory.

The Business Official shall be responsible for ensuring that all hazardous chemicals in containers are properly labeled and updated, as necessary.

If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container. Pre-labeled spray bottles are available for any chemicals in bulk containers.

All pipes carrying hazardous chemicals shall be labeled.

Employee Information and Training

All District employees will receive Right to Know training on a yearly basis. Everyone who works with or is potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on the safe use of those specific hazardous chemicals. "Exposure" means that "an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure." Whenever a new hazard is introduced or an old hazard changes, additional training is provided.

Information and training is a critical part of the hazard communication program. We train our employees to read and understand the information on labels and SDS's, determine how the

information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.

Our goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use labels and SDS's, and appropriately following the protective measures we have established. As part of the assessment of the training program, the trainer asks for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

All employees receive training for hazard communication.

Training Content

Employees receive training upon hiring and then annually. Training includes hands-on, classroom, testing and audiovisual aides. The format of the training program used is video and live instruction and discussion.

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the GHS and other standard labeling system used, and access to SDS information and what it means.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

New Lebanon CSD ensures that all new employees are trained upon hiring as well as when a new hazard is introduced into any of our facilities.

Hazards of Nonroutine Tasks

When employees are required to perform hazardous nonroutine tasks including entering confined spaces that have the potential to expose workers to hazardous chemicals, we inform employees of these hazards by: training & supervising.

Outside Employer Hazard Information

When contractors or any other employers' workers (i.e., painters, electricians, or plumbers) will be working at the district, the Business Official will provide the other employer(s) with access to SDS's for any of our chemicals to which their employees may be exposed.

Each contractor bringing chemicals on-site must provide the Business Official with the appropriate hazard information on these substances, including the SDS's, the labels used and the precautionary measures to be taken in working with these chemicals.

Additional Information

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS's, and chemical information lists from the Business Official.

Appendix A

We have attached to this plan the 29CFR1910.1200 regulations; chemical inventory list, samples, or procedures that ensure better understanding of our written program.

Appendix B

We have attached the list of employees exposed to toxic and hazardous substances.

Appendix A

Pool

| Product Name | Manufacturer |
|------------------------------|--|
| DPD 1A Free Chlorine Reagent | LaMotte |
| DPD 1B | LaMotte |
| DPD 1R Tablet | LaMotte |
| Muriatic Acid 20-37% | Slack Chemical Co., Inc. |
| Sodium Bicarbonate | Natrium Products Inc. Slack Chemical Co., Inc. |
| Sodium Hypochlorite | Inc. |

| Product Name | Manufacturer |
|--|--------------------------|
| Ax-It Baseboard Stripper | Betco Corp. |
| Best Scrub | Betco Corp. |
| Bleach | James Austin Company |
| Buckeye Arena 300 | Buckeye |
| Buckeye Castleguard | Buckeye |
| Buckeye Ripsaw | Buckeye |
| Clothesline Fresh Chlorine Bleach | Spartan Chemical Co. |
| CLR Calcium, Lime & Rust Remover | Jelmar, LLC |
| Consume | Spartan Chemical Co. |
| Daily Scrub SC | Betco Corp. |
| Deep Blue Concentrate 1:30 | Betco Corp. |
| Do It Mineral Spirits/Paint Thinner | Sunnyside Corp. |
| Dust Mop Treatment | Betco Corp. |
| Eco Melt | Ossian Inc. |
| Goo Gone | Magic American Products |
| Green Earth Daily Floor Cleaner | Betco Corp. |
| Hard Surface Disinfecting Wipes Fresh Scent | Spartan Chemical Co. |
| Lime B Gone | Noble Chemical |
| Lime Scale Remover | Simoniz USA Inc. |
| LPS ThermaPlex Multi-Purpose Bearing Grease | LPS Laboratories |
| LTX Zone Mark YLO | Valspar |
| NABC Hard Surface Disinfecting Wipes | Spartan Chemical Co. |
| OxyFect G Peroxide Disinfectant Cleaner | Betco Corp. |
| ProLink Chalkboard Cleaner WB-YA017 | Pro-Link |
| Simple Green Cleaner/Degreaser/Deodorizer | Sunshine Makers, Inc. |
| Steriphene II Brand Disinfectant Deoderant Spring Breeze Fragrance | Spartan Chemical Co. |
| Symmetry Green Certified Foaming Handwash | Buckeye |
| Symmetry Non-Alcohol Foaming Hand Sanitizer | Buckeye |
| V.I.P. Hand & Body Cream | Technical Services Group |
| WD-40 | WD-40 Company |
| Xtraction II | Spartan Chemical Co. |

Appendix B

Cleaners, Laborers and Maintenance workers:

Robert Cummings

Kristin Wittig

Richard Menegio

Jay Freeman

Teresa Green

Joe Maikels

James Avallon

Martin Bachner

Mechanics:

Martin Gibbons