

PPS Hazard Communication Written Program

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Introduction

Portland Public School District (PPS) is committed to providing a safe, healthful environment for all employees. PPS has developed the following hazard communication standard (HCS) program in compliance with Occupational Safety and Health Administration (OSHA) standards 29 CFR 1910.1200. PPS will develop hazardous-chemical lists, obtain safety data sheets (SDS's) for each hazardous material used and provide training to our employees so they have a thorough understanding of what is required of the standard.

The program is administered by the PPS Environmental Health and Safety (EHS) department. The written plan, including the link to the chemical inventory and SDS's, will be made available online on the Risk Management department page on the PPS website, and upon request. The master document of the Written Hazard Communication Plan will be retained and maintained by the EHS department.

Scope

This program applies to all normal and emergency work operations, as required by local, state and federal regulations.

Chemical Inventory

A chemical inventory will be developed and maintained by the PPS Environmental Health and Safety (EHS) department. The chemical inventory will be kept electronically in a database and be available online on the PPS website. When new chemicals arrive on any PPS site, the SDS of the chemical will be uploaded to the SDS database. Chemicals will be added or archived in the chemical inventory as needed.

Project-specific chemical inventory lists will be developed for third party contracted projects and maintained at the jobsite by the contractor and project management, along with the appropriate SDS's.

Hazard Determination

It will be the policy of PPS not to evaluate hazardous chemicals purchased from suppliers or manufacturers. The suppliers and manufacturers will be relied upon to supply the information needed to satisfy standard requirements. The SDS will be reviewed for completeness and additional information from the manufacturer will be requested if needed.

Safety Data Sheets

Safety Data Sheets or “SDS” (formerly known as MSDS) contain detailed information about the physical, health, and other hazards of each chemical. Employees have the right to review Safety Data Sheets for all hazardous chemicals used at their workplace. Safety data sheets are readily available to all employees at any time. All SDS’s and the SDS database will be maintained by the PPS Environmental Health and Safety (EHS) department.

As new chemicals are purchased or otherwise brought onto PPS property for use, all of the chemical's SDS's will be sent to EHS for evaluation and documentation in the SDS database. If a chemical arrives without a SDS, the EHS office will be notified and will begin the process of obtaining the SDS. If a chemical's SDS is not immediately available for an employee they may contact EHS staff directly in person, by email, or by phone to request an SDS.

If the chemical is a part of a project, the project manager and contractor will be responsible for creating and maintaining the project-specific chemical list for the project's duration.

Containers and Warning Labels

PPS staff must procure and use accurate hazard warning labels for chemicals that they use at work. Chemical labels will be consistent throughout the entire district in accordance with the Globally Harmonized System (GHS) of chemical labeling. They will contain, at a minimum, the original manufacturer's label or the following information:

- The product identifier (name) of the chemical
- A signal word
- A pictogram
- A list of all potential hazards associated with the chemical
- The manufacturer's name, address and telephone number(s)

Labels must be legible and in English. The product identifier for each chemical must match and must be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet.

New and old chemical containers must be inspected to ensure that the chemical labels are present and accurate. All labels must be affixed on containers properly. If a label falls off, the chemical container will be removed from service until a new label is affixed.

Secondary containers are vessels, canisters, jars, spray bottles, etc, which are used to transfer or utilize chemicals from a manufacturer's or company's labeled container. A secondary container is solely for the *immediate* use of the employee who performs the transfer into the new container. The secondary container *must* be labeled if it is to be used beyond the initial employee's work shift. Each secondary, sub-container, or portable container must be dedicated to a single chemical and labeled with the appropriate information before use. No product will be used until it is properly labeled.

Nonroutine Tasks

On occasion, PPS may be required to perform nonroutine tasks that may involve the use of hazardous substances. If such a need arises, PPS will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment (PPE) and all additional training as required. A briefing

will be conducted to inform employees of the potentially hazardous chemicals they may be exposed to during the nonroutine operation, and measures they can take to avoid those exposures. This will include any emergency procedures.

Informing Contractors

Any contractor with employees working in the PPS workplace will be informed of the hazardous chemicals to which the contractor's employees may be exposed while performing their work. The contractor will take appropriate protective measures, as determined by the SDS's provided. PPS project managers will confer with the contractor's management as appropriate to discuss any hazards particular either to the work the contractor will be performing, or the work area in which the work will be performed.

In addition, PPS will require any contractor who intends to bring any hazardous chemicals to the workplace to provide an SDS for each such chemical. The contractor will further be required to explain (orally or in writing) any precautionary measures necessary to protect employees during normal operation conditions or in foreseeable emergencies. The contractor also will explain their company's system for labeling hazardous chemicals. PPS will train, or require the contractor to train, any PPS employee who may be exposed to hazardous chemicals used by the contractor.

Training

Employees who potentially could be exposed to hazardous chemicals will receive training in the elements of the Hazard Communication Standard (HCS). This training must be taken before the employee handles or is exposed to any chemical hazard in the workplace.

The training will address at minimum the following:

- A summary of the company's HAZCOM/HCS program
- Methods of detecting hazardous chemicals, including identifying a hazards' chemical and physical properties
- Physical and health hazards, and signs or symptoms of exposure
- Proper work practices for working with a hazardous substance
- Engineering controls, work practices, and PPE selection
- Emergency procedures and first aid for spills and other exposures
- Locations of SDS's and the written program
- How to read a SDS
- The labeling system, and how to interpret the information contained on the label
- How to obtain additional information

The training will be provided online through the PPS training portal, and compliance and date of certification will be tracked internally. The training will be taken annually to reacquaint employees with the HCS standard and discuss any changes made to the program. The training program elements will be reviewed at least annually to ensure compliance and accuracy to the most current guidance and standards available.

Injury & Illness Record Keeping

Injuries may be reported through the Corvell Injury Reporting phone number (844) 264-5042). Injury and illness records are maintained at all times in accordance with OSHA regulations.

Portland Public Schools (PPS) will maintain its Hazardous Chemicals Inventory for chemicals used or shipped from the Facility or worksite for at least 30 years.

Emergencies

In case of an emergency call **911**.

Refer to a chemical's specific SDS sheet for guidance on first aid or chemical spill response actions that should be taken.

Resources and Links:

[OSHA'S Hazard Communication webpage](#)

[29 CFR 1910.1200 Occupational Safety Regulations](#)

[29 CFR 1910.1200 Hazard Communication Regulations](#)

[PPS Hazardous Materials Webpage](#)

[PPS Safety Data Sheets Webpage](#)