Hazard Communication Program

In accordance with the Occupational Safety and Health Administration (OSHA), Hazard Communication Standard, 29 CFR 1910.1200, Subpart Z, Prince William County Public Schools (PWCS) established the following Hazard Communication Program. The Office of Risk Management and Security Services will administer this program.

The PWCS Hazard Communication Program shall include provisions for the following:

- Labeling and securing of hazardous chemicals/products;
- Obtaining information on Safety Data Sheets;
- Employee training; and
- Informing contractors.

I. Labeling and Securing of Hazardous Chemicals

A. In accordance with the OSHA Hazard Communication Standard, all chemicals shall be properly labeled.

B. Office of Supply Services – Chemicals shipped directly to the Office of Supply Services’ warehouse shall be inspected for applicable labeling and its Safety Data Sheet prior to distribution to any School Division facility. The Office of Supply Services shall forward Safety Data Sheets to the Office of Risk Management and Security Services where a complete reference of Safety Data Sheets shall be maintained.

C. Direct Shipment – When chemicals are delivered directly to the school site/location, the following procedures shall be followed:

1. All chemicals received shall contain a Safety Data Sheet. If a Safety Data Sheet was not included with the product, the school shall contact the vendor to obtain the Safety Data Sheet prior to its distribution.

2. The chemical shall then be inventoried, and a copy of the Safety Data Sheet shall be forwarded to the Office of Risk Management and Security Services.

3. A copy of the Safety Data Sheet may be kept at the site for reference.
D. Individual Purchases – When an employee purchases any chemical/product over the counter, the following procedures shall be followed:

1. A Safety Data Sheet shall be acquired before purchasing.

2. Prior to distribution of the chemical, it shall be inventoried, and the Safety Data Sheet forwarded to the Office of Risk Management and Security Services.

3. A copy of the Safety Data Sheet may be kept at the site for reference.

II. Safety Data Sheets

A. The Hazard Communication Standard requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets, formerly known as Material Safety Data Sheets, to communicate the hazards of hazardous chemical products. As of June 1, 2015, the Hazard Communication Standard required the Safety Data Sheet to be in a uniform format to include the section numbers, the headings, and associated information under the headings as noted below:

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

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

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

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

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

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

7. Section 7 - Handling and storage lists precautions for safe handling and storage, including incompatibilities;
8. Section 8 - Exposure controls/personal protection lists OSHA’s Permissible Exposure Limits (PELs); the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the Safety Data Sheets where available and appropriate engineering controls; personal protective equipment;

9. Section 9 - Physical and chemical properties lists the chemical’s characteristics;

10. Section 10 - Stability and reactivity lists chemical stability and possibility of hazardous reactions;

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

12. Section 12 - Ecological information;

13. Section 13 - Disposal considerations;

14. Section 14 - Transport information;

15. Section 15 - Regulatory information; and

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

B. Copies of Safety Data Sheets for all hazardous chemicals/products to which employees may be exposed shall be maintained in the Office of Risk Management and Security Services.

C. PWCS has contracted with 3E Company (3E) to provide employee access to Safety Data Sheets upon request, via fax or email. 3E’s service provides employee access to live assistance 24-hours a day, seven days a week for all Safety Data Sheet requests.

1. 3E provides four types of Safety Data Sheet requests:

   a. Emergency Requests (Immediate to 15 Minutes)
      • Poisoning/Chemical Exposure
      • Chemical Spill
      • Human or Environmental Contamination
      • Fire
b. Urgent Requests (Immediate to 30 Minutes)
   - Regulatory Agency Requests (i.e., OSHA, EPA, Fire Service)

c. Standard Requests (Immediate to 8 Hours)
   - Employee Requests
   - Contractor Requests

d. Mail Requests (Mailed within Three Business Days)

2. 3E posters containing their contact information shall be visible in all School Division facilities where chemicals are used or stored.

III. Employee Training

A. Newly hired employees shall review the video, “GHS – Globalize your Communication” and complete a 10-question posttest. The training provides new employees with a clear understanding of the following terms:

1. Product Identifier: May be the product name or an identifying number that can be cross-referenced to the corresponding Safety Data Sheet, and to the list of hazardous chemicals that PWCS maintain as part of our written Hazard Communication Program.

2. Signal Words: Words used to indicate the relative level of severity of the hazard. The only signal words to be used are “Danger” and “Warning.” Other signal words like “Caution” or “Beware” are no longer allowed. “Danger” is the signal word used for more severe hazards while “Warning” is the signal word used for less severe hazards.

3. Hazard Statements: Is a short statement assigned to a specific hazard class and category. The statement describes the nature of the hazard(s) of the chemical and when appropriate, includes the degree of hazard. Examples of hazard statements include, “Highly flammable liquid and vapor,” or “May cause liver damage.”

4. Precautionary Statements: Is a phrase that lists recommended measures to take to minimize or prevent adverse effects resulting from exposure, improper storage, or handling of hazardous chemicals. An example of a precautionary statement would be, “Keep away from heat, flames, and sparks,” or “No Smoking.”
5. Pictograms: Are icons that appear in a small red box. There are eight different pictograms with one or more appearing on a label. Each pictogram quickly identifies the specific type of hazard associated with the product.

6. Name, address, and telephone number of the chemical’s manufacturer, importer, or other responsible party.

B. The Department of Human Resources shall be responsible for ensuring that all new employees receive training and understand the Hazard Communication Standard prior to reporting to their assigned work location. The Department of Human Resources shall maintain a database with dates employees were initially trained on the PWCS Hazard Communication Program.

IV. Contractors

Contractors shall provide Safety Data Sheets for all hazardous chemicals used or stored in School Division facilities. Contractors shall forward the Safety Data Sheets to the Office of Risk Management and Security Services where a complete reference of Safety Data Sheets shall be maintained.

The Associate Superintendent for Finance and Support Services (or designee) is responsible for implementing and monitoring this regulation.

The Associate Superintendent for Finance and Support Services (or designee) is responsible for reviewing this regulation in 2020.