

HAZARD COMMUNICATION PROGRAM- Right to Understand



Records Retention Office
Conway , SC

General Information

In order to comply with the South Carolina Occupational Safety and Health Administration (OSHA) standard on Hazard Communication, Sub-article 6, Section 1910.1200, the following Written Hazard Communication Program – Right to Understand has been established for **Records Retention Office, Conway, SC**

All divisions and sections of the school are included within the program. The written program will be available in the front office for review by all interested employees.

Records Retention Office will meet the requirements of this regulation as follows: Any chemicals in the **Records Retention Office** that are **not** currently in use and will not be used still have to be included in this program. The safest way to eliminate this requirement is by arranging for proper disposal of these chemicals and document last date of use on the current Safety Data Sheet to be filed in the “Inactive Chemicals” sections of this plan.

List of Hazardous Chemicals

A list of all known hazardous chemicals used by employees of **Records Retention Office** is attached to this written program and is available to all affected employees at all times. Further information on each noted chemical can be obtained by reviewing Safety Data Sheets located in front office or online on the schools web site under Staff, School MSDS. Inventory must be updated with any change in product use by submitting changes to District Office.

(1.) **Safety Data Sheets (SDS)**

Copies of SDSs for all hazardous chemicals to which employees of this school may be exposed will be kept in the area where chemicals are stored, the front office, and online.

SDSs will be available to all employees in their work area for review during each workday. If SDSs are not available or new chemicals in use do not have SDS, please immediately contact your school's Facility Manager, **Teresa Clarkson** for assistance.

Safety Data Sheets are considered to be **Medical Records under 1910.1020**; therefore, any chemicals at the school, currently used or not, have to be maintained for 30 years and made available to employees upon request. A master list of SDS records will be maintained in the Nurse's office. The SDS sheet for any chemical no longer being used in the school will be filed with a Inactive Status. The SDS sheet will show a start and end date of service and these records are maintained in the Master SDS manual in the Nurse's office.

(2.) **Employee Training and Information**

Prior to starting work, each new cafeteria and custodial employee of **Records Retention Office** will attend a new hire orientation and will receive information and training on the following:

- (a.) An overview of the requirements contained in the Hazard Communication Standard, section 1910.1200
- (b.) Chemicals present in their workplace operations
- (c.) Location, availability, and content of our Written Hazard Communication Program – Right to Understand
- (d.) Physical and health effects of the hazardous chemicals
- (e.) Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area
- (f.) How to lessen or prevent exposure to these hazardous chemicals through use of control/work practices and PPE (Personal Protective Equipment)
- (g.) Steps the school has taken to lessen or prevent exposure to these chemicals
- (h.) Safety emergency procedures to follow if they are exposed to these chemicals
- (i.) How to read labels and SDSs to obtain necessary hazard information

The above training will be conducted by the department supervisor. In addition employees will complete training through the SafeSchools online training program on an annual basis. Records of school based trainings will be maintained at the school/department level. Records of online training are available through the **Facility Manager of Records Retention, Teresa Clarkson** or Human Resources department at the District Office.

Prior to a new hazardous chemical being introduced into any area of this school, each employee of that area will be given information as outlined above.

The department supervisor is responsible for ensuring that SDSs on the new chemicals are available.

(3.) **Container Labeling**

The Facility Manager, **Teresa Clarkson** will verify that all containers received for use will:

- (a.) Be clearly labeled as to the contents
- (b.) Note the appropriate hazard warning to include any target organs
- (c.) List the name and address and 800 phone number of the manufacturer

It is the policy of this district that no container will be released for use until the above data is verified.

The manager in each area will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label. For help with labeling, contact the cafeteria manager or custodial supervisor listed above.

(5.) **Hazardous Non-routine Tasks**

Occasionally, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information and training by their supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

- (a.) Specific chemical hazards
- (b.) Protective/safety measures the employee can take
- (c.) Measures the district has taken to lessen the hazards including ventilation, respirators, presence of another employee, and emergency procedures

(6.) **Informing Contractors** of hazard communication requirements is included in the Procurement contract for all contractors.

Reviewed and approved by Facility Management Team Chair:

Annual Review by: _____ Date: _____
Facility Administrator – Chair