

# PREPAREDNESS FOR TOXIC HAZARD AND ASBESTOS HAZARD

The Board of Education is concerned for the safety of the students and staff members and will attempt to comply with all Federal and State statutes and regulations to protect them from hazards that may result from industrial accidents beyond the control of school officials or from the presence of asbestos materials used in previous construction.

## **TOXIC HAZARDS**

These hazards exist in chemicals, pesticides, and other substances used in the school setting such as in laboratories, science classrooms, kitchens, and in the cleaning of rooms and equipment.

The Board will appoint an employee to serve as Toxic Hazard Preparedness (THP) Officer. The THP Officer will be responsible for the following:

A. **Hazard Determination**

Identification of potential sources of toxic hazards in cooperation with material suppliers, who shall supply the Toxic Hazard Preparedness Officer (THP) with Material Safety Data Sheets (MSDS) The Board will rely on the Material Safety Data Sheets from material suppliers to meet hazard determination requirements.

B. **Labeling**

Ensuring that all incoming materials are properly labeled with the identity of the chemical, the hazard warning, and the name and address of the manufacturer or responsible party, and that any containers to which the materials are transferred are also properly labeled.

C. **Material Safety Data Sheets (MSDS)**

Maintain a current file of MSDSs for all hazardous materials present on District property. The MSDS files will be kept at the Central Office; additional copies for employees' use will be located at the Supervisor's Office.

MSDSs will be available for review to all employees. Copies will be available upon request to the Toxic Hazard Preparedness Officer. Posters identifying the person responsible for monitoring MSDSs and where MSDSs are located at the Supervisor's Office. Posters notifying employees when new MSDSs are received will be located in the same location. The Toxic Hazard Preparedness Officer shall contact the supplier, in writing, if a required MSDS is not received, and promptly procure the MSDS before releasing the material for use.

If she/he is unable to obtain an MSDS from a supplier, she/he should contact MIOSHA's Occupational Health Division (OHD) or General Industry Safety Division (GISD) for assistance in obtaining the MSDS.

D. **Multi-Employer Work Sites – Informing Contractors**

Informing contractors and their employees of any hazardous substances to which they may be exposed; measures to be employed to control or eliminate exposure; container and pipe labeling system used on-site; and where applicable MSDSs can be reviewed or obtained. Whenever District employees may potentially be exposed to hazards brought on site by contractors, the THP Officer will obtain information from the contractor pertaining to chemicals brought on-site, and measures that should be taken to control or eliminate exposure to chemicals.

E. **Employee Information and Training**

Providing information to and conducting a training program for all District employees on such topics as detection of hazards, explanation of the health hazards to which they could be exposed in their work environment, and the District's plan for communication, labeling. Records of each employee's hazardous communication training should be maintained and all new employees should receive training regarding any hazardous chemicals they may potentially come in contact with as part of their job.

The information should include:

1. regulations of MIOSHA's hazardous communication standard;
2. all operations in employee's work area where hazardous chemicals are present;
3. location and availability of written hazardous communication program (i.e. the policy), the list of hazardous chemicals and the MSDSs.

Training should include:

1. techniques used to detect presence or release of hazardous chemicals in work area;
2. physical and health hazard of hazardous chemicals;
3. the measures the employee should take to protect themselves from these hazards;
4. details of the hazardous communication program including an explanation of labeling system and MSDSs and how employees can obtain and use hazard information.

Employees shall also be informed of:

1. the employer's anti-discrimination/discharge policy for employees accessing hazard information;
2. how the employee can contact OHD or GISD for assistance in obtaining an MSDS if she/he is unable to obtain the MSDS from the employer.

- F. Hazardous non-routine tasks (optional) - before an employee is required to start a non-routine task (e.g. enter confined space) the employee will be given information about the hazards of the area or procedure including specific chemical hazards, protection or safety measures the employee can take to lessen hazard, and measures the company has taken to eliminate or control hazard.

Any staff member or contractor who applies pesticides on District property shall meet the requirements of AG 8431A in addition to requirements established by the State. She/He shall provide written notification each year, prior to any application, to all parents and staff members 1) that a pesticide is to be applied, 2) the type of pesticide and its potential side effects, 3) the location of the application, and 4) the date of the application.

In fulfilling these responsibilities, the THP Officer may enlist the aid of county and municipal authorities and, if possible, the owners or operators of identified potential sources of toxic hazard.

The Board may, in its discretion, appoint and charge an ad hoc committee of community representatives to assist the THP Officer.

## **ASBESTOS**

In its efforts to comply with Asbestos Hazard Emergency Response Act (AHERA) and the Michigan Occupational Safety and Health Act (MIOSHA), the Board recognizes its responsibility to:

- A. inspect all District buildings for the existence of asbestos or asbestos-containing materials;
- B. take appropriate actions, in accordance with State law and EPA regulations, based on the inspections;
- C. establish a program for dealing with friable asbestos, if found;
- D. maintain a program of periodic surveillance and inspection of facilities or equipment containing asbestos;
- E. comply with EPA regulations governing the transportation and disposal of asbestos and asbestos-containing materials.

The Superintendent shall appoint a person to develop and implement the District's Asbestos-Management Program which will ensure proper compliance with Federal and State laws and the appropriate instruction of staff and students.

The Superintendent shall also ensure that, when conducting asbestos abatement projects, each contractor employed by the District is licensed pursuant to the Michigan Department of Health Regulations.

Nothing in this policy should be construed in any way as an assumption of liability by the Board for any death, injury, or illness that is the consequence of an accident or equipment failure or negligent act, or a deliberate act beyond the control of the Board or its officers and employees.

The District may provide, however, legal representation and indemnification against civil liability with regard to claims or actions resulting from or arising out of negligence or alleged negligence of those persons responsible for inspecting, monitoring, removing, treating asbestos or material containing asbestos, or supervising these activities, provided the employee was performing the duties while in the course of his/her employment or while acting within the scope of his/her authority. The District reserves the right to deny representation and indemnification in those circumstances wherein the employee's actions demonstrate gross negligence or willful and wanton misconduct.

This policy may apply to work performed by authorized employees prior to the date of its adoption.

## **WRITTEN HAZARD COMMUNICATION PROGRAM**

Use of these guidelines will produce a toxic hazard communication program that will be in compliance with the Preparedness for Toxic Hazard and Asbestos Hazard policy as stated above. Some methods go beyond the minimum requirements of the standard to more effectively communicate hazards to staff members, for example, having them sign training statements.

### **General**

The following written hazard communication program has been established for the District by its THP officer, the Superintendent.

The program will be available in his/her office for review by all employees.

#### **A. Hazard Determination**

THP will be relying on Material Safety Data Sheets from material suppliers to meet hazard determination requirements.

#### **B. Labeling**

The THP will be responsible for ensuring that:

1. all incoming labels are properly labeled;
2. all incoming products are checked for identity, hazard warning, and name and address of the responsible party;
3. all portable containers are labeled with identity and hazard warning;
4. piping systems are painted at access points and every ten (10) feet where the piping is eight (8) feet or closer to employee contact.

#### **C. Material Safety Data Sheets (MSDS)**

1. The THP will be responsible for compiling the master MSDS file. It will be kept in the Superintendent's office.
2. MSDSs will be available for review to all employees. Copies will be available upon request to all supervisors.
3. The THP shall make requests for MSDSs on all purchase orders. A file of follow-up letters shall be maintained for all shipments received without MSDSs.
4. The THP shall provide supervisors with the required OSHA Right to Know poster and postings notifying employees of new or revised MSDSs within five (5) days of receipt of a new or revised MSDS.

D. **Employee Information and Training**

1. The THP Officer shall coordinate and maintain records of training.
2. Before starting work, each new employee will attend a safety class and be given a Hazardous Materials handbook which will have information on:
  - a. chemicals and their hazards in their work areas;
  - b. how to lessen or prevent exposure to these hazardous chemicals;
  - c. what has been done to lessen or prevent workers' exposure to these chemicals;
  - d. procedures to follow if they are exposed to these chemicals;
  - e. how to read and interpret labels and MSDSs.
3. After attending the class each employee will sign a form stating that they received the written materials outlined above and received the safety training.
4. Before any new hazardous material is allowed in the District, appropriate employee will be given information in the same manner as during the safety class. Each supervisor will be responsible for seeing that MSDSs on the new chemical are available.

The following forms are attached:

1. Material Safety Data Sheet (MSDS) Request Form
2. Material Safety Data Sheet (MSDS)
3. Checklist of Required Information for Material Safety Data Sheets (MSDS)
4. Acknowledgment of Information Concerning Toxic Hazards

**MATERIAL SAFETY DATA SHEET REQUEST FORM**

**TO: CHEMICAL MANUFACTURER, IMPORTER, OR DISTRIBUTOR**

As you are aware, OSHA requires employers to provide training to their employees concerning the hazards of chemicals or other hazardous materials.

To properly train our employees, we need a Material Safety Data Sheet (MSDS) for the following product(s):

Your prompt attention is necessary to maintain a proper level of safety for our employees. Please send the MSDS for \_\_\_\_\_ no later than (Insert Date) \_\_\_\_\_ to:

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Address

\_\_\_\_\_  
City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip Code

**MATERIAL SAFETY DATA SHEET**

This form may be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. To be valid, all information required by 1910.1200(g) of the Standard must appear on this form. Consult the Standard for specific requirements. Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be marked to indicate that.

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IDENTITY (as Used on Label)

=====  
**Section I**

=====  
Manufacturer's Name

Emergency Telephone Number

-----  
Address (Number, Street, City, State, & Zip)

Telephone Number for Information

-----  
Date Prepared

-----  
Signature of Preparer (opt.)

=====  
**Section II. - Hazardous Ingredients/Identity Information**

Hazardous Components:  
(Specific Chemical Identity  
or Common Name(s))

OSHA PEL

ACGIN TLV

Other Limits

Recommended

% (Opt.)

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**Section III. - Physical/Chemical Characteristics**

Boiling Point\_\_\_\_\_

Specific Gravity (H2O = 1)\_\_\_\_\_

Vapor Pressure (mm Hg.)\_\_\_\_\_

Melting Point\_\_\_\_\_

Vapor Density (AIR = 1)\_\_\_\_\_

Evaporation Rate

(Butyl Acetone = 1)\_\_\_\_\_

Solubility in Water\_\_\_\_\_

Appearance and Odor\_\_\_\_\_

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**Section IV. - Fire and Explosion Hazard Data**

Flash Point (Method Used)

Flammable Limits

LEL

UEL

Extinguishing Media

Special Fire Fighting Procedures

Unusual Fire and Explosion Hazards

**CHECKLIST OF REQUIRED INFORMATION**  
**MATERIAL SAFETY DATA SHEETS (MSDS)**

The Hazard Communication Standard requires that thirteen (13) items of information must be included in Material Safety Data Sheets provided to purchasers. There is no specified order for these items; they may be found anywhere on the MSDS. If the preparer of the MSDS has found no relevant information for any given item, she/he must mark the MSDS to indicate that no applicable information was found. This checklist will help you in determining the completeness of a Materials Safety Data Sheet. It does not assess the accuracy of the information provided.

Check

1. \_\_\_ The identity used on the (container) label\*
2. \_\_\_ Chemical and common names - may be the same as the label identity\*
3. \_\_\_ The physical and chemical characteristics of the substance (e.g., flash point, odor,U.E.L.)
4. \_\_\_ Physical hazards (e.g., combustible, water - reactive)
5. \_\_\_ Health hazards (e.g., toxic, carcinogenic, corrosive) also include signs and symptoms of exposure and the medical conditions aggravated by exposure
6. \_\_\_ Primary route(s) of entry (e.g., inhalation)
7. \_\_\_ Air exposure limits (P.E.L. or T.L.V.)
8. \_\_\_ Carcinogenicity
9. \_\_\_ Precautions for safe handling and use (e.g., hygienic practices, cleaning up spills)
10. \_\_\_ Control measures (e.g., engineering controls, personal protective equipment)
11. \_\_\_ Emergency and first-aid procedures
12. \_\_\_ Date of preparation of MSDS
13. \_\_\_ Name/address/phone number of MSDS preparer or distributor

**\*THE IDENTITY USED ON THE LABEL MAY BE THE SAME AS A CHEMICAL OR COMMON NAME**

CHEMICAL\_\_\_\_\_ CHECKED BY\_\_\_\_\_

DATE ON MSDS\_\_\_\_\_

**ACKNOWLEDGMENT OF INFORMATION CONCERNING TOXIC HAZARDS**

This is to confirm that the School District has provided me with sufficient information concerning any toxic materials I may encounter on District property while performing my duties. I believe I have been adequately informed about what these materials are, how they are identified, and the possible effects they may have on my health.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature