Memphis Shelby County Schools (MSCS)

Written Hazard Communication Program

Revision Date: March 11, 2024

Introduction

In order to comply with the Tennessee Hazardous Chemical Right-to- Know Law and the Occupational Safety and Health Act (Title 29 Code of Federal Regulations 1910.1200) Hazard Communication Standard, the following written Hazard Communication Program has been established for the Memphis Shelby County Schools.

This program applies to all departments, divisions, schools, and/or work locations of MSCS where employees may be exposed to hazardous chemicals under normal working conditions or during emergency situations. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements.

The Superintendent has overall responsibility for the program, including reviewing and update the program, as necessary. Copies of the program may be obtained from the Office of Risk Management who keeps the program for MSCS.

The program will also be posted on the Risk Management web site for review as well. The Memphis Shelby County Schools Hazard Communication program includes provisions for the following:

- Container Labeling
- Safety Data Sheets
- Employee Training and Information
- Hazardous Chemical List
- Chemicals in Unlabeled Pipes
- Informing Contractors

Finally, if after reading this program, you find that improvements can be made, please contact the Office of Risk Management. 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 district.

I. Container Labeling

In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged or marked in accordance with the Hazard Communication Standard with:

- The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s)
- The product identifier and words, pictures, symbols, or combination thereof, which provides at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the Hazard Communication Program, will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.

While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking, because shipped containers of hazardous chemicals must bear this information. Hazards not otherwise classified, if any, do not have to be addressed on a container but must be addressed on the safety data sheet.

Because the product Identifier is found on the label, the SDS, and our chemical inventory, the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number.

Employees should be aware that label information can be identified by referring to the corresponding SDS.

The *Coordinator of Warehousing* at 1384 Farmville Road, is responsible for ensuring that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are legible, in English (although other languages may also be included) and displayed clearly on the container or readily available in the work area throughout each work shift, as required. This person will update labels, as necessary. The Coordinator of Warehousing also ensures that newly purchased chemicals are checked for labels when containers are received.

The *Coordinator of Warehousing* or his/her designee, is responsible for ensuring

proper labeling, tagging, or marking of any shipped container leaving the warehouse. These labels, tags, or markings must provide not only the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s) but also the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

A poster is displayed to inform employees about the Hazard Communication Standard. It is the "State of Tennessee Hazardous Chemical Right-To-Know" poster. Copies can be obtained from the Office of Risk Management.

If employees transfer chemicals from the primary labeled container to a portable secondary container that is identified for IMMEDIATE use, no labels, tags, or markings are required on the portable container.
Otherwise, portable containers must be labeled, tagged, or marked in accordance with our in-hose labeling system for workplace containers.

The in-house labeling system we use for workplace containers labeling is: All containers intended for use as secondary containers at each work location should be pre-labeled or supplied with preprinted labels from the manufacturer or vendor. The principal or the first line supervisor in each work location will ensure secondary containers are labeled with the proper "Hazardous Material Label".

Finally, the following procedures are used to review and update label information when necessary, to ensure that labels that fall off or become unreadable are immediately replaced: The Coordinator of Warehousing at 1384 Farmville Road will be responsible for assuring that all containers received at the warehouse are properly labeled. The Coordinator or his/her designee will verify that all containers for use will:

- Be clearly labeled as to the content (chemical or common name)
- Display the appropriate hazard warning(s)
- List the name and address of the manufacturer/importer

If the original label provided by the manufacturer/importer meets these requirements and is prominently displayed, it will be left as is. If the container label is not prominently displayed or meets these requirements, a new label will be provided. Consequently, all existing inventory will be surveyed to ensure each container is properly labeled. No container will be released for use until proper labeling is verified as to whether a label is required. If a label is required, the shipment will be sent back with the transporter to the distributor, importer, or manufacturer or store the

chemical until it can be labeled. A letter should then be sent to the manufacturer, importer, or distributor requesting a chemical label. If the label is not received in 30 days, we then contact TOSHA for assistance.

II. Safety Data Sheets (SDSs)

SDS's are fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas or they work with.

MSCS' Office of Risk Management is responsible for obtaining and maintaining the SDS's at our workplace and will contact the chemical manufacturer or vendor if additional chemical information is needed. All new procurements for the district must cleared by the Office of Risk Management.

SDS's are kept readily accessible to all employees during each work shift, in a central file at each work location, during each work shift. Employees may obtain access to them through their principal or first line supervisor. Dispatched maintenance crews will be furnished SDS's by the zone manager or first line supervisor. If SDS's are not available, or new chemicals in use do not have an SDS, the worker shall immediately contact the principal or appropriate administrator who will submit a "Request for a Copy of a Safety Data Sheet" to the Office of Risk Management, 160 South Hollywood, Room 152.

When procuring new materials, terms and conditions of RFPs or purchase orders should include a statement requiring the SDS to accompany all shipments. For items not procured through the Procurement and Warehousing Section, the originator, (principal or administrator), of that purchase is responsible for ensuring that a SDS is obtained. A copy will be sent to the Office of Risk Management for the central file or added to the electronic file. New shipments of materials received at the main warehousing at 1384 Farmville Road without an SDS will not be receipted into the warehouse inventory or distributed unless the Coordinator of Warehousing verifies that the SDS has already been obtained by checking the product name against a master list located in the Risk Management Office or against our online database. The SDS should be received at the warehouse prior to or at the time of shipment. If an SDS is not provided with shipment, the Warehouse Coordinator shall obtain one from the importer as soon as possible, after the following steps have been followed:

1. If an SDS was not already sent, determine whether or not an SDS is required based on whether the chemical falls under 29 CFR 1910.1200, Hazard Communication Standard.
2. If an SDS is not required, then no further action is required.
3. If an SDS is required, a written request is sent to the chemical manufacturer, importer, or distributor as soon as possible.
4. A copy of the letter is filed in the Risk Management Office for documentation.
5. If the SDS is received, a copy is uploaded into the database for each locations review.
6. After 30 days and several attempts, if the SDS is not procured from the manufacturer, the matter will be referred to the TOSHA/OSHA office for assistance.

Item 1: "The right is reserved to accept the bid most advantageous to the Board of Education. Successful vendors shall be paid only when delivery is complete. Safety Data Sheets (SDSs) must accompany all shipments covered under the Tennessee Hazardous Chemical Right-to-Know Law". (Tennessee Public Chapter #417 – House Bill #371)

It should be noted that OSHA allows SDS's to be kept in any form, as long as the information is provided for each hazardous chemical and is readily accessible during each work shift to employees when they are in their work area(s). Therefore, we have taken advantage of this flexible OSHA provision for alternatives to SDS's in the workplace. Our alternative(s) includes: Online database system which can be accessed from any computer at any school or work location….

III. Employee Training and Information

All employees who work with or are potentially "exposed" to hazardous chemicals while on the job will be provided with initial training in the following areas:

- An overview of the requirements contained in the Hazard Communication Standard.
- Chemicals present in their workplace operations.
- Location and availability of our written hazard communication program.
- Physical and health effects of the hazardous chemicals.
- Health hazards, including signs and symptoms of over exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to lessen or prevent exposure to these hazardous chemicals through the use of engineering control or work practice controls and personal protective equipment and its proper use and maintenance.
- Steps the school system has taken to lessen or prevent exposure to these chemicals.
- How to read and use both the workplace labeling system and labels received on containers.
- The order of information found SDSs and how to read the information and what it means.

The initial program will consist of two parts: the first covering the "basics" of the Hazard Communication Program (regulations, labeling, SDSs, and terminology) and the second, covering the "specific" hazards of the material with which employees work, appropriate control measures, safety precautions. The training program sessions will consist of lectures, audiovisual, and on-line video tutorials. Prior to starting work, each new employee will attend or be given access the required "basic and specific" training sessions by his/her subordinate (principal, administrative supervisor, or foreman). We train employees when a new hazard is introduced by new materials introduced into the workplace. Information on the hazards and precautions will be provided to the employees by the immediate superordinate prior to prior to

their working with the materials.

Information reviewed from the SDSs for currently used materials will be provided to the employees by their immediate superordinate as it is received from the Office of Risk Management.

Hazard Communication refresher training is given annually with the “basic and specific” training for existing employees, employing the same training methods used for new employees.

After employees have completed each training session (basic and Specific), each employee will sign a form to verify that he/she attended or watched the training and understand Shelby County School’s policies on Hazard Communication. For employees that received the training through the online web based tutorial, a certificate will be issued to them for use as verification to the appropriate administrator(s) should they be transferred or change location or positions in the MSCS. Instructions and a copy of the course outline for the two (basic and specific) training sessions and certificate is included as Appendix A.

IV. Hazardous Non-Routine Tasks

Periodically, employees are required to perform non-routine tasks that involve hazardous chemicals. Prior to starting work on such projects, each affected employee will be given information by his/her superordinate about hazardous chemicals to which h/she may be exposed during such activity.
This information will include:

- Specific chemical hazards.
- Protective/safety measures the employee will use.
- Measures the system has taken to lessen the hazards including ventilation, respirators, presence of another employee, and emergency procedures.

Examples of non-routine tasks performed by employees of the school system:

- Cleaning out boilers
- Refinishing floor surfaces
- Cleaning windows
- Cleaning kitchens and air conditioning filters
- Boilers/air conditioning water treatment

Examples of the hazardous chemicals they may be exposed to while performing these tasks include:

- Asbestos
- Ammonia, bleach
- Dust
- Sulfuric acid, dimethyl ammonium chloride, sodium dichromate, sodium hydroxide

V. Chemicals In Unlabeled Pipes

Work activities are sometimes performed by employees in areas where hazardous chemicals are transferred through unlabeled pipes. We inform employees of the hazards of chemicals contained in unlabeled pipes in their work areas by: Prior to starting work in these in these areas, employees are trained to contact the principal or the principal's designee for information regarding:

- The chemicals in the pipes
- Potential hazards
- Safety precautions which should be taken.

An example of these areas include chemistry labs, cooling towers, boiler rooms that contain hazardous chemicals like nitrate, boron, sulfite, sodium hydroxide, amines.

VI. Informing Contractors

It is the responsibility of The Office Risk Management to provide the following information to contractors with employees working on Shelby County School sites:

- Hazardous chemicals to which they may be exposed while on the job.
- Precautions the employees may take to lessen the possibility of exposure using appropriate protective measures.

For construction contracts, the expected hazards to which the contractor's employees may be exposed and appropriate precautions will be discussed at a pre-construction meeting, prior to initiating work. The Office of Risk Management will notify the contractor's designated representative if there are any work operation changes or unusual conditions that could constitute a hazard to the contractor's employees during the period of the contract. The contract specifications will require the contractor provide the Office of Risk Management with a complete list of hazardous material to which MSCS employees may be exposed so that proper safety precautions may be determined prior to start of the contract.

For service contractors, the principal or principal's designee will apprise the contractor of any unusual conditions, hazard, or precautions to be taken during normal operating

conditions and in foreseeable emergencies prior to the initiation of work in a specific area. The principal or principal's designee shall provide other employer(s) on-site access to SDS's for each hazardous chemicals the other employer(s) employees may be exposed to while working.

VII. Multi-Employer Facility

When contractors or any other employers' workers will be working at this workplace, the Office of Risk Management, will:

- Provide the other employer(s) as follows with the SDSs for any of our hazardous chemicals to which their employees may be exposed: For construction contracts, the expected hazards to which the contractor's employees may be exposed and appropriate precautions will be discussed at a pre-construction hearing, prior to initiating work. The Office of Risk Management will notify the contractor's designated representative if there are any work operation changes or unusual conditions that could constitute a hazard to the contractor's employees during the period of the contract.

- Relay to other employer(s) as follows all necessary in-house labeling system and precautionary information for normal operations and foreseeable emergencies: The contract specifications will require that the contractor provide the Office of Risk Management with a complete list of hazardous materials to which to which MSCS' employees may be exposed, so that proper safety precautions may be determined prior to start of the contract. For service contractors, the principal or principal's designee will apprise the contractor of any unusual conditions, hazards, or precautions to be taken during normal operating conditions and in emergency situations.

VIII. Hazardous Chemical List

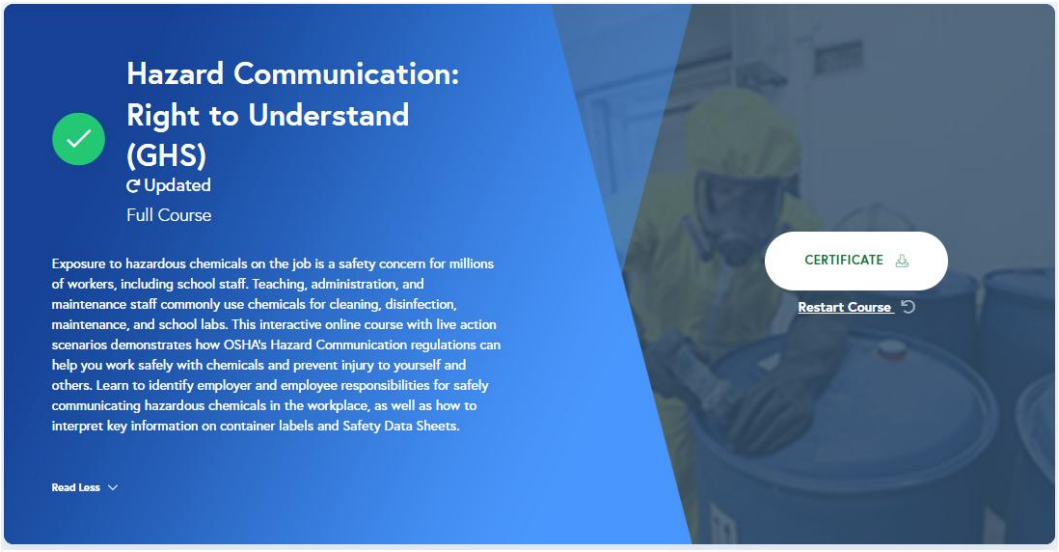
A Hazardous chemical and SDS's for all locations is maintained at the MSCS Office of Risk Management. A hazardous chemical list for each school, major department, shop, and work assembly location will be kept at these locations. The hazardous chemicals list prototype is included as Appendix B of this document, as is the method used to inform the other employer(s) of the labeling system used in the workplace.

APPENDIX A

Outline of Training Sessions

(Basic and Specific)

VectorSolutions
Vector Training, K-12 Edition



Course Sections

5 / 5 Complete

Introduction About 2 Minutes Required	Completed	>
Hazard Communication Basics About 6 Minutes Required	Completed	>
Revised Hazard Communication Standard - the Right to Understand About 3 Minutes Required	Completed	>
Label Requirements for Hazardous Chemicals About 13 Minutes Required	Completed	>
Final Assessment About 2 Minutes 80% required to pass Required	Passed	>

Course Requirements

Assessment Requirement
80%

Course Details

Total Course Duration
28 Minutes

Category
Environmental

Resources

All resources will open in a new window.

UNECE: Globally Harmonized System of Classification of Chemicals and Labeling (GHS)

OSHA: HCS Pictograms and Hazard Classes

OSHA: Sample Product Label

Admin Resources

You are seeing this because you are an administrator.

Download
Printable assessment

Revision Date: March 11, 2024

Certificate of Completion

Memphis Shelby County Schools

(First Name/Last Name)

has completed

Hazard Communication: Right to Understand (GHS) (Full Course)

a training program requiring **20 minutes**

on

(Day of Week), Month/Day/Year

Description

Our Hazard Communications: Right to Understand course reflects OSHA's 2012 revised Hazard Communication Standard that now gives workers the "right to understand" hazards they may encounter in the workplace. The course also addresses implementation of the Globally Harmonized System of Classification of Chemicals and Labeling (GHS) and the change from Material Safety Data Sheets (MSDS) to the new Safety Data Sheets (SDS).

This course is designed for school staff.

Resources

OSHA

HCS Pictograms and Hazard Classes

- **www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html**

Sample Product Label

- **www.osha.gov/Publications/HazComm_QuickCard_**

Labels.html UNECE

Globally Harmonized System of Classification of Chemicals and Labeling (GHS)

- **www.unece.org/trans/danger/publi/ghs/ghs_rev03/03files_e.html**

APPENDIX B

Workplace Chemical List

Chemical Inventory List (sample)

Building/School Name:

_____

Address:

_____

Completed by: Date:

_____ _____

Chemical Name	**Usage (Daily, Weekly, etc)**	**Storage Location**	**SDS (Current)**