

# New Haven Public Schools



## CHEMICAL HYGIENE PLAN

Including Custodial "Hazardous Communication" Addendum



Tom Falzone  
Safety Officer, Compliance Trainer

# New Haven Public Schools Chemical Hygiene Plan

## **I. Purpose**

- (A) This plan is intended to protect the Health & Safety of all NHBOE personnel working with/exposed to hazardous materials.
- (B) The plan is intended to ensure that hazardous materials are stored, handled, and disposed of in a safe and environmentally proper manner.
- (C) This plan is intended to ensure compliance with applicable Federal, State, Local, and N.H.B.O.E. regulations.

## **II. Scope**

- A) This policy applies to all the Facilities Maintenance and Custodial areas, as well as School Laboratories, Shops and Art Rooms.
- B) All other applicable O.S.H.A. Health and Safety Standards shall be complied to in addition to the requirements of this policy.

## **III. Operations**

The following laboratories and shops are covered by this policy: All chemical storage facilities, all Science lab classrooms which use chemicals, all Unified Arts shops and classrooms which store and use chemicals, all Art classrooms or storage areas which use chemicals, and all Custodial, Maintenance and Trades Shop areas.

## **IV. Responsibilities**

- A) The Superintendent of Schools, Dr. Iline Tracey.
  - (1) Support and ensure enforcement of this policy.
  - (2) Appoint and/or hire and support the District Chemical Hygiene Officer.
- B) The District Health and Safety Officer [CHO], Mr. Tom Falzone, Office Phone: (475)220-1662, Cell Phone: (475-225-6028) located at 375 Quinnipiac Ave. New Haven, Ct. Support from the Chairman of Operations COO/NHPS, Mr. Joseph Barbarotta and Mr. John Barbarotta, GoTo Services will:
  - 1) Administer the Chemical Hygiene Plan.
  - 2) Assist in the development of Standard Operating Procedures.
  - 3) Will coordinate the "training - in servicing" of (Facilities/Other) employees.
  - 4) Oversee and monitor employee exposure to hazardous materials.
  - 5) Maintain and review Safety Data Sheets (S.D.S.) and Globally Harmonized System (G.H.S.) of Labeling as per O.S.H.A. guidelines.

- 6) Periodically inspect all areas which use chemicals for policy compliance. Evaluate the adequacy of personal protective equipment {PPE} and when necessary recommend appropriate changes to meet compliance.
- 7) Recommend engineering controls and periodically inspect to ensure that they are used and functioning properly.
- 8) Assist in the preparation/implementation of special hazardous operations.
- 9) Review and monitor proper disposal of Hazardous Materials.
- 10) Ensure that all Employees are aware of Medical Consultative Services which are available to them. (Yale/ST. Raphael Occupational Health Unit)
- 11) Annually conduct a review of any hazardous materials being used/stored.
- 12) Annually review the C.H.P. and update as needed.
- 13) Maintain appropriate records/files for C.H.P. compliance.
- 14) Have all departments send copies of SDS sheets for all purchased chemicals, with periodic updates. The Globally Harmonized System, "G.H.S." is utilized including the Pictogram Labeling System, per current Chemical Inventories.

### **C) Chemical Hygiene Plan, Guidelines for Schools**

- 1) A school "Health & Safety" contact person may be appointed yearly by the Principal. However, a report of concern or inquiry may be made to the Facilities Dept. or specifically Mr. Tom Falzone, the Health & Safety Officer.
- 2) Schools must follow the C.H.P. and maintain any relevant "OSHA Files."
- 3) Any person may contact the district Health and Safety [CHO] Officer with any issues of non-compliance they deem are present.
- 4) Annually inventory and ensure proper storage and use of hazardous chemicals. Proper disposal measures must be followed. For guidance Contact: Facilities, Tom Falzone.
- 5) Ensure that SDS sheets are received & filed for all new chemical purchases.
- 6) Request as necessary maintenance on engineering control equipment.
- 7) Ensure that chemicals are properly labeled. Utilizing "GHS" labelling system.
- 8) Ensure that employees use personal protective equipment when required.
- 9) Ensure that all employees have access to required information/files.
- 10) Prepare required reports and record compliance with the C.H.P.  
Post "It's The Law" OSHA Posters in prominent high visibility areas.  
New copies may be obtained through [www.OSHA.gov](http://www.OSHA.gov), documents.

### **D) Teaching Custodial and Security Staffs**

- (1) Use the engineering equipment provided and report malfunctions.
- (2) Follow district S.O.P.'s and attend yearly O.S.H.A. refresher training.
- (3) Promptly notify their Supervisors with problems/malfunctions.
- (4) Follow required programs for storage, use, and disposal of chemicals.
- (5) Use appropriate personal protective equipment as required.
- (6) Security Staff are essential for monitoring reasons and accident control.

**(E) Nursing Staff**

- 1) Be familiar with chemicals in use and associated health hazards.
- 2) NO Mercury devices!!
- 3) Make any necessary contacts and medical referrals. Handle B.B.P. Disposal Protocol according to State and Local regulations.

**V. Standard Operating Procedures**

**A) Chemical Procurement.**

- 1) All hazardous materials procurement/requests must be reviewed & approved by the on-site CHP representative. Refer to OSHA Sub-Standard Part Z Toxic & Carcinogenic materials. Forward any questions or clarifications Tom Falzone for final approval.

**B) Eating/Smoking**

- 1) As per district regulations smoking is not permitted in NHBOE facilities.
- 2) Food and drink are not allowed in labs and shop areas.

**C) Clothing**

- 1) No open toed shoes/sandals in areas where chemicals are being used.
- 2) Wearing of shorts is not permitted in areas where chemicals are used.
- 3) Lab coats and/or chemical resistant aprons must be worn when working with hazardous chemicals/materials. (Refer to Safety Data Sheet for guidance)

**D) Personal Protective Equipment [P.P.E.]**

- 1) Chemical resistant Safety Glasses or Goggles must be worn when working with chemicals. See SDS or ANSI codes. Ref. Ct. General Statutes, 10-214a
- 2) Gloves [Nitrile or Neoprene], chemical aprons, appropriate, shoe coverings, or boots must be worn as per S.D.S. while using hazardous materials.

**E) The Big "3": Use, Storage and Waste Disposal**

- 1) All chemicals must be used strictly following the S.D.S. directions and with strict adherence to the new G.H.S. labeling system and its PICTOGRAMS. {Fully implemented in July 2016}.
- 2) The materials should be stored in their original container. If the material has to be transferred into a new container that container must be relabeled properly as required by the new OSHA "GHS" Standard, using Labeling with the correct Pictogram(s) and values.

- 3) All Flammable materials must be properly stored in flammable cabinets.  
Note: Fume hoods are not for storage of bulk chemicals or unrelated items.
- 4) Minimal amounts of hazardous materials may be stored [under lock] in the labs, shops, and prep rooms. Bulk storage of the materials must be in locked storage rooms designed for this purpose. Appropriate shelving and marked storage cabinets should be used.
- 5) Transferring of solvents should only be in approved safety cans. The use of glass bottles for transferring of chemical solvents is not permitted.
- 6) All waste materials should be stored in a designated disposal area until Tom Falzone can make arrangements for proper disposal.
- 7) Waste containers should be labeled as required under OSHA regulations.
- 8) No waste materials should be stored for more than one week. Those materials that can be safely disposed of on site should be disposed of within that one-week period.
- 9) Only licensed, pre-approved contractors shall be used to dispose of either "Hazardous Chemicals" or "Regular Waste." Contact Facilities Dept. or Tom Falzone (475-225-6028) with any questions.
- 10) Designated [major] waste storage areas, if applicable, should be equipped with spill control/containment equipment for temporary remedy until a licensed clean up team and Tom Falzone are on site.

#### **F) Engineering Controls**

- 1) All flammable, toxic materials should be used within a laboratory hood or with local exhaust ventilation.
- 2) Hoods should only be used to conduct operations, not for storage.
- 3) A review of chemical compatibility should be conducted to ensure that compatible chemicals are used in the same system.
- 4) The sash of the hood should be kept as low as possible during operation.
- 5) The face velocity of the hood should be at 125 board feet per minute.
- 6) The flow rate of fume hoods should be checked annually.
- 7) Each hood should have an indicator which will notify the operators if the hood is functioning properly.
- 8) If a hood is not performing to specifications it must be shut down until repaired. Contact Tom Falzone.
- 9) All electrical equipment must be grounded to code. Annual inspections of electrical equipment shall be conducted by the proper supervisor. When required special cabinets shall be used to protect employees from exposure to hazardous materials.
- 10) All eyewashes must be flushed weekly, minimum of 30 sec. Water valves for eye wash and drench showers cannot be turned off. Access to both must be unimpeded. Any malfunction should be reported immediately for remediation by calling Tom Falzone.
- 11) Lift and Harness Training. TWO custodians to be present when using lifts!!

- 12) Lock out /Tag out for faulty electrical equipment must be strictly followed!

**(G) Major Spills, Chemical Release Events**

- 1) **CALL 911 !!** Then call Mr. Tom Falzone (Facilities) at 475-225-2068.
- 2) In the event of accidental Chemical contact the following procedures should be followed:
  - (a) Eye Contact: flush at eye wash for 10-15 minutes, and seek medical attention, if necessary.
  - (b) Skin Contact: remove contaminated clothing and flush immediately. Seek medical attention if necessary.
  - (c) Any other types of related Incidents seek medical attention, if required.
  - (d) In all cases notify your immediate supervisor and fill out an accident report form ASAP. [OSHA Log 300]
- 3) In the event of a **major** spill [i.e.: a 100ml bottle or larger] of a hazardous chemical/material **after calling 911** call Tom Falzone and follow these procedures:
  - a) For flammable materials extinguish all sources of ignition.
  - b) Isolate the area and use spill/absorption kits if available.
  - c) Use any Respiratory PPE available and then evacuate the area.
  - d) Minor spills should follow procedures in lab safety manuals or as found in SDS. In ALL Events the (SDS) Safety Data Sheet should be read before working with chemicals so as to ascertain risk levels and proper response procedures.

**VI. Medical Consultations**

- A) All employees suspected of or known to have been exposed to materials above the "Action Limit" or half of the PEL [Permissible Exposure Limit] shall be offered a medical evaluation. As per NHBOE directive all medical referrals are to be made to YNH/St. Raphael's Hospital [Emergency Center].
- B) Any employee who exhibits signs or symptoms of exposure must be referred for a medical examination.
- C) Employees involved in a spill, leak, or accident clean up may receive an examination depending on the nature and severity level of the accident.
- D) The Physician must be furnished with the following information:
  - 1) Identity of the exposure materials.
  - 2) When and how the exposure took place.
  - 3) A description of the operation and any monitoring conducted.
  - 4) Any description that may help the Physician determine if health effects have been or might be manifested.
- E) The Physician [Health Center] shall issue a written opinion to both the employee and the NHBOE which must contain the following:

- 1) Summary of the results including diagnoses, medical opinions, any laboratory test results.
- 2) Any follow up recommendations.
- 3) Opinion if the employee will be at risk by returning to their job.
- 4) A statement by the Physician that the employee has been informed of the results of the examination/treatment & of any follow up medical evaluations that should be conducted.

### **VII. Employee Training/In servicing**

The employees shall be periodically trained [mandated yearly], quizzed, and authorized on the Safety Topics listed below. Note: The Facilities or Security Staffs receive training from Tom Falzone, Facilities OSHA Coordinator and Trainer. Other Employees receive training per their Departments.

- 1) The existence, location, availability, and full contents of the NHBOE District "Chemical Hygiene/HazCom Plan." Also referred to as the "C.H.P."
  - 2) OSHA 29 CFR 1910:1030; 29 CFR 1910:1200; and 29 CFR 1910:20.
  - 3) Hazard information about the materials used including signs and symptoms of over exposure.
  - 4) The location, availability and understanding of S.D.S. THIS IS CRITICAL!!
  - 5) The new Global Harmonized System "GHS for labeling chemicals.
  - 6) The Medical Program.
  - 7) The district "Blood Borne Pathogen Plan" [B.B.P.] revised 2017.
  - 8) Emergency Evacuation Plans and procedures.
  - 9) District "Chemical Disposal Procedure."
  - 10) CONNOSHA "Right To Know" document.
  - 11) Asbestos "A.H.E.R.A." [Asbestos Hazard Emergency Response Act].
- A) A copy of the C.H.P., S.D.S.'s and all O.S.H.A. Regulation documents shall be available to employees during regular work time. Fully accessible copies may be held in a known location i.e. the Main Office or available electronically on the N.H.P.S. Website, in the Facilities section.

### **VIII. Recordkeeping**

- A) All Training documents and copies of current Certificates of Training.
- B) All Monitoring documents.
- C) All Accident/Incident [OSHA 300/301 not required] reports.
- D) Any disciplinary actions will be maintained in "Confidential" Files.
- E) Engineering control service records.
- F) Disposal records with any D.E.E.P. reports included.

## **IX. Plan Review and Revision**

**This plan shall be reviewed annually and revised as needed.**

**It includes:**

- A) Plan effectiveness.
- B) Pertinent Records.
- C) Changes/Revisions recommended.
- D) In servicing of staff for documented Re-Authorization forms filed with Health & Safety Officer, the School central file, and a copy for employees.