IEA, INC.

NEW PRAGUE AREA SCHOOLS
ISD #721

Management Plan
for
Employee Right-to-Know (ERK)

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GSA Schedule
Contract GS-10F-0033V

New Prague Area Schools

Management Plan for Employee Right-to-Know

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New Prague Area Schools* Annual Review Form *Management Plan for Employee Right-to-Know

Certification

I certify that I have reviewed the information provided and accept this written management plan. With assistance from our EHS consultant, the district will implement the policies and procedures noted within this plan. The written plan is a working document that will be reviewed and revised annually, or as needed.

Craig Most _____ _____ March 19, 2015 _____

Print Name Signature Date

Program reviews and follow-up of program-related issues are documented below.

Date	Actions/Comments	Reviewed by:

1.0 Purpose

The purpose of this plan is to reduce the potential for injury associated with exposure to hazardous substances and to comply with Minnesota OSHA's (MNOSHA) Employee Right-to-Know Chapter 5206 and Federal OSHA 29 CFR 1910.1200.

The Management Plan for Employee Right-to-Know (ERK) applies to employees involved with, or who have the potential for exposure to, hazardous chemicals, physical agents, or infectious materials. This plan is available for review on the District website under Health & Safety.

2.0 Globally Harmonized System (GHS) Compliance

Federal OSHA updated its Hazard Communication (HazCom) standard on March 26, 2012 to bring the United States into alignment with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The updated standard provides a single set of harmonized criteria for chemical manufacturers and importers for classifying chemicals according to their health and physical hazards, and specific formatting for labeling and Safety Data Sheets (SDS). MNOSHA has adopted the federal HazCom standard with the following exceptions:

1. MNOSHA retained its annual training requirements under MN ERK
2. MNOSHA did not adopt the federal exceptions for ionizing and nonionizing radiation and biological agents because they are covered under MN ERK

New Prague Area Schools will incorporate the GHS changes into our existing ERK program as follows:

1. Affected employees will be trained on the new SDS format and new label elements (including pictograms) before the December 1, 2013 deadline. This information will be incorporated into all ERK trainings going forward.
2. Begin replacing chemical products that have older manufacturer labels and Material Safety Data Sheets (MSDS) with new GHS-compliant SDS and product labels as provided by our chemical vendors. Older MSDS will be archived according to OSHA requirements in 1910.1020(d)(1). Manufacturer labels and SDS must conform to the new requirements by December 15, 2015.
3. Update alternative workplace labeling (e.g. secondary container labels) throughout the district and this written program as necessary by June 1, 2016.

3.0 Identification of Workplace Hazards

Workplace hazards include dangerous chemicals, situations, or other unsafe conditions found in the workplace. The Employee Right-to-Know standard identifies categories of work place hazards that are included in this management plan.

<u>Hazardous substances</u> are chemicals that may cause acute or chronic health effects in exposed employees as demonstrated by at least one scientific study conducted according to established scientific principles. Hazardous chemicals include carcinogens, toxic agents, reproductive toxins, irritants, corrosives, sensitizers, agents which damage the lungs, skin, eyes, or mucous membranes, hepato (liver) toxins, nephro (kidney) toxins, neuro (nerve) toxins, and agents that act on the hematopoietic (blood-forming organs) system. Hazardous chemicals can be found in science departments, custodial areas, kitchens, industrial technology rooms, and art rooms throughout New Prague Area Schools.

<u>Harmful Physical Agents</u> include heat, noise, ionizing radiation, non-ionizing radiation, and infectious materials. Any employee whose exposure level to one or more of these agents is close to or exceeds allowable limits set by OSHA is included in this plan.

- Heat can be a byproduct of work. The body cools itself through increased blood flow to the skin and through perspiration. Working in a hot environment can alter the body's natural defenses against heat. Heat stress is rarely a hazard within a school district; however, the district's grounds crew is informed of the potential for heat stress during summer months and is instructed to take frequent breaks in a cooler environment and increase liquid intake to help guard against heat stress and heat stroke.

- Federal OSHA sets specific standards for noise exposure in 29 CFR 1910.95. Protection is provided by the district when employee noise exposure exceeds OSHA's Action Level of 85 decibels (dB) based on an eight-hour time-weighted average. Employees exposed to this level of noise are covered in the district's *Hearing Conservation Program*.
- Ionizing radiation is found in X-ray equipment, radioactive materials, and a variety of other equipment. The potential for over-exposure to this type of radiation does not usually exist in schools and no plans to reduce or eliminate exposure have been developed for New Prague Area Schools.
- Non-ionizing radiation can come from equipment such as microwaves, televisions, baby monitors, or AM/FM clock radios. It is different from ionizing radiation in that it is non-cumulative. This type of radiation is only hazardous in extremely high amounts, not typically associated with school districts. Therefore, the district does not have a policy to eliminate this type of hazard from the workplace.
- Infectious Agents are hazards that, when introduced into the body, can cause sickness, disease, or death. The common cold, influenza, and head lice are examples of infectious agents. These agents can be transmitted through contact with body fluids, human waste, personal items, and ordinary human contact. New Prague Area Schools was surveyed to identify those employees routinely exposed to blood and body fluids and supports those employees under the *Exposure Control Plan for Bloodborne Pathogens*. The Custodial staff are the school's designated employees trained to respond to bodily fluid spills.

4.0 Hazard Assessments

Assessments were conducted to identify employee groups that could potentially be exposed to hazardous substances in the workplace. The assessments consist of a review of job descriptions, interviews with supervisors and employees, as well as a review of the chemical inventory. The hazard assessments are located in Appendix A.

5.0 Chemical Inventory and Material Safety Data Sheets

Chemical Inventory

An update of the chemical inventory is conducted annually by each department to maintain accurate records of the hazardous materials used in each district facility. The chemical inventory is maintained with the MSDS/SDS books in each department.

Material Safety Data Sheets (MSDS)/Safety Data Sheets (SDS)

District employees are provided product information on the chemicals used in their work area. The sources of this information are the MSDS or SDS and the manufacturer's label. The MSDSs (building and department specific) are located in department.

Manufacturers or suppliers furnish MSDS/SDS for their products. All demonstration products are accompanied by MSDS/SDS. Vendors include an information summary for training purposes. No demonstration products will be kept for longer than 30 days, and unused portions will be either returned to or picked up by the vendor.

MSDS/SDS are not necessary for personal products. Personal products consist of consumer products that are not used as a component of an employee's job duties, substances in sealed packages that are not opened, or substances that are in a physical state, volume, or concentration that does not present a hazard.

The department head or designated person periodically reviews the catalogs of MSDS/SDS. It is the responsibility of each department to maintain its catalog of MSDS/SDS and inventory of chemicals. Chemicals with low odor or volatile organic compound (VOC) content are used in accordance with the district's *Indoor Air Quality Program.*

6.0 Standard Operating Procedures

Container Labeling

Chemical containers have proper labels regardless of size. Incoming chemicals are labeled with the manufacturer's label containing the product name, appropriate hazard warnings, and name and address of the manufacturer.

Secondary Use Containers

Containers used for distribution of products purchased in bulk quantities (such as spray bottles) are labeled with product name and hazard warning. Labels are affixed to containers prior to use.

Immediate Use Containers

Process containers are not required to be labeled if they:

- Are used only to transfer a hazardous substance from a labeled container to another labeled container.
- Remain under the control of the person who transferred the substance and they are only used during the work shift in which the transfer takes place.

Special or Non-routine Situations

Special or non-routine exposures may take place. It is the responsibility of the employee to notify his or her supervisor if this occurs. If a non-routine chemical is used, the employee is given an MSDS/SDS and any other pertinent information prior to use.

Emergency Situations

Emergency spills should be handled according to the district's *Emergency Action Plan*. DO NOT ATTEMPT TO CLEAN UP THE SPILL IMMEDIATELY, unless you are familiar with the chemical that has been spilled and the proper procedure for cleaning it up. If there are questions about the product, refer to the MSDS/SDS for more information. If questions still remain, call your supervisor for more information and cleanup guidance. It may be appropriate to contact local fire departments, hazardous materials operators, or emergency response teams to contain and clean up spilled chemicals.

7.0 Training

New Prague Area Schools offers training to employees covered under the ERK program. It is the school administrator and department supervisor's responsibility to assure the participation of these employees in the safety-training program. Training is performed before initial assignment, before new hazardous materials are introduced into the worksite, and annually thereafter. Training includes the following information:

- A summary of the ERK program
- MSDS/SDS specific information
- Hazard information, either by chemical or by category of hazard
- Types and exposure levels of hazardous physical agents

Training records of employees covered under the ERK program are located in the Operations Office.

8.0 Contractor Policy

New Prague Area Schools often employs contractors to perform work throughout the district. Contracted employees are informed, prior to performing work, of potential hazardous substances, harmful physical agents, or infectious agents they may encounter. Contracted employees are also given MSDS/SDS and labeling information if applicable or requested.

9.0 Record Retention

Training records are maintained for three years. Records include employee name, the training date, the instructor's name, and the information covered during the training. MSDS/SDS for chemicals no longer used are archived for 30 years.

10.0 Program Review

This plan and the chemical inventory are reviewed annually to update information and training records.

Appendix A

ERK Occupational Assessment Tool

Appendix B

Guide to Hazard Identification

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Appendix C

Labeling Examples – HMIS-MSDS based on NFPA and GHS-SDS

Appendix D

Job Safety Analysis Form