

## WRITTEN HAZARD COMMUNICATION PROGRAM

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The following written hazard communication program has been established for Kalamazoo RESA. The program will be available in the Human Resources department for review by all employees.

### Hazard Determination

- A. Kalamazoo RESA will rely on Safety Data Sheets (SDS) from material suppliers to meet hazard determination requirements.

### Hazard Classification

- A. Chemical manufacturers or importers shall evaluate chemicals they produced or import to classify the chemicals in accordance with the revised Hazard Communication Standard.
- B. Effective June 1, 2015 - For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that apply to the chemical being classified. This information will be placed in the Safety Data Sheet (SDS) and on the product label.
- C. Kalamazoo RESA will rely on SDSs obtained from product suppliers to determine which chemicals are classified as hazardous for employees.

### Labeling

- A. The Facilities Manager will be responsible for seeing that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled.
- B. All labels shall be checked for:
  - 1. Product identifier;
  - 2. Signal word;
  - 3. Hazard statement(s);
  - 4. Pictogram(s);
  - 5. Precautionary statement(s); and,
  - 6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- C. Each supervisor shall be responsible for ensuring that all secondary workplace containers used in their work area are labeled with the appropriate product identifier and provide employees with information regarding the physical and health hazards of the hazardous chemical.

Note: Workplace labeling. The employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with **either**:

The information specified for labels on shipped containers; **OR**, product identifier and words, pictures, symbols, or combination thereof, which provide 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.

### Safety Data Sheets (SDS)

The **Change from MSDS to SDS format effective June 1, 2015** - Chemical manufacturers or importers shall ensure that SDSs for their products includes the following Sections in order:

- Section 1, Identification;
- Section 2, Hazard(s) identification;
- Section 3, Composition/information on ingredients;
- Section 4, First-aid measures;
- Section 5, Fire-fighting measures;
- Section 6, Accidental release measures;
- Section 7, Handling and storage;
- Section 8, Exposure controls/personal protection;
- Section 9, Physical and chemical properties;
- Section 10, Stability and reactivity;
- Section 11, Toxicological information.
- Section 12, Ecological information;
- Section 13, Disposal considerations;
- Section 14, Transport information;
- Section 15, Regulatory information; and
- Section 16, Other information, including date of preparation or last revision.

- A. The Facilities Manager will be responsible for compiling and maintaining the master SDS file. The file will be kept in/at the KRESA Central Office. Further information regarding any of these chemicals can be obtained by reviewing its respective SDS. The master SDS file which contains chemical identities used on KRESA properties can also be found at [Material Safety Data Sheets \(kresa.org\)](http://Material Safety Data Sheets (kresa.org))
- B. Additional copies of SDSs for employee use are located in/at KRESA Central Office.
- C. SDSs will be available for review to all employees during each work shift. Copies

will be available upon request to the Facilities Manager.

- D. Posters identifying the person responsible for maintaining SDSs and where the SDSs are located are posted at chemical storage areas. Posters notifying employees when new or revised SDSs are received will be located in the same location(s).
- E. If a required SDS is not received, the Facilities Manager shall contact the supplier, in writing, to request the SDS. If an SDS is not received after two such requests, the Facilities Manager shall contact the MIOSHA's Construction Safety and Health Division at (517) 284-7680 or General Industry Safety and Health Division (GISHD) at (517) 284-7750, for assistance in obtaining the SDS.
- F. The Business Office shall make requests for SDS's on all purchase orders. If a SDS is not received after requests, Kalamazoo RESA shall conduct MIOSHA's Occupational Health Division at (517) 322-1608 for assistance in obtaining the SDS. A file of follow-up letters shall be maintained for all shipments received without SDS's.
- G. Human Resources shall provide each administrator with the required MIOSHA Right to Know Poster. The Facilities Manager will provide postings notifying employees of new or revised SDS's within five (5) days of receipt or revised SDS.

*The MIOSHA program does not maintain a library of SDSs. However, either of the above divisions will assist an employee in obtaining a copy of a SDS by contacting the employer or supplier.*

## Employee Information and Training

Under OSHA requirements, all employees, both full and part-time, are required to have completed annual Hazardous Communications Safety training.

Kalamazoo RESA conducts Hazardous Communications Safety training using an online program through SafeSchools. Employees in need of accommodation should contact their administrator for further information.

The training takes approximately twenty (20) minutes and can be done either at home

or during the workday. The program can be accessed on our website at [www.kresa.org](http://www.kresa.org).

The Human Resources department monitors that all employees complete the training. A reminder notice is sent to each administrator regarding employees who have not completed the training.

For questions specific to the content of the Hazardous Communications safety training, contact Human Resources.

- A. Each employee whose workstation would be exposed to hazardous materials will be asked to review the SDS forms as well as review information on:
  - a. chemicals and their hazards in their work areas
  - b. how to lessen or prevent exposure to the hazardous chemicals
  - c. what Kalamazoo RESA has done to lessen or prevent workers' exposure to the
  - d. how to read and interpret labels and SDS's used at Kalamazoo RESA.
- B. The employee shall be informed that:
  - a. The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
  - b. As an alternative to requesting a SDS from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 284-7680, or the MIOSHA General Industry Safety and Health Division at (517) 284-7750, to obtain the desired SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.
- C. Before any new physical or health hazard is introduced into the workplace, each employee shall be given information regarding the chemical's contents and safe handling/usage of the chemical. The divisional administrator shall be responsible for seeing that SDS's on the new chemical are available. In each area where hazardous materials are used, safety meetings shall be held, and attendance will be mandatory for all employees. Notices shall be posted on the

employee bulletin boards that provide the location of the written hazard communication program.

## Informing Contractors

- A. It is the responsibility of the Facilities Manager to provide the contractors and their employees with the following information prior to any services being performed:
- The hazardous chemicals they may encounter.
  - Measures their employees can take to control or eliminate exposure to the hazardous chemicals.
  - The container and pipe labeling system used on-site.
  - Where applicable SDSs can be reviewed or obtained.
  - Steps Kalamazoo RESA has taken to lessen risks.
  - Procedures to follow if they are exposed.
- B. The Facilities Manager shall coordinate with the divisional administrator to ensure that contractors' employees are given this information prior to entering the work site.
- C. Periodically, our employees may potentially be exposed to hazardous chemicals brought on our site by another employer. When this occurs, we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.
- D. It is the responsibility of the Facilities Manager to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. To ensure that this is done the following mechanisms will be followed:
- Verbal informing
  - Preemptive SDS document sharing
  - Sharing of specialized operational factors involved in KRESA School buildings, including typical behaviors of students.

## Pipes and Piping Systems

A. Information on the hazardous contents of pipes and piping systems will be identified by:

- a. Labels on each pipe containing hazardous chemicals.

## List of Hazardous Chemicals

A list of hazardous chemicals used by Kalamazoo RESA is available from the Facilities Manager.

Further information regarding any chemicals used can be obtained by reviewing the product's respective SDS.

Authority: 1974 PA 154  
29 CFR 1970.1200