New Haven Public Schools

CHEMICAL HYGIENE PLAN

Dr. Marc Blosveren, District Health & Safety Officer

REVISED SEPT 2007
I. **Purpose**

   A) This plan is intended to protect the Health and Safety of all NHBOE personnel working with 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 NHBOE regulations.

II. **Scope**

   A) This policy applies to all laboratory, shop, art, maintenance and custodial areas.

   B) All other applicable OSHA Health and Safety Standards shall be complied with 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. Reginald Mayo.

      (1) Support and ensure enforcement of this policy.

      (2) Appoint and/or hire and support the District Chemical Hygiene Officer.

   B) District Health & Safety Officer [CHO], Dr. Marc Blosveren {671-5135} located at Aramark, 654 Ferry Street, New Haven.
(1) Administer the Chemical Hygiene Plan.
(2) Assist in the development of Standard Operating Procedures.
(3) Coordinate the training/inservicing of employees.
(4) Oversee and monitor employee exposure to hazardous materials.
(5) Keep and review Material Safety Data Sheets for OSHA compliance.
(6) Periodically inspect all areas which use chemicals for policy compliance.
(7) Evaluate the adequacy of personal protective equipment {PPE} and when necessary recommend appropriate changes to meet compliance.
(8) Recommend engineering controls and periodically inspect to ensure that they are used and functioning properly.
(9) Assist in the preparation/implementation of special hazardous operations.
(10) Review and monitor disposal of hazardous materials.
(11) Ensure that all employees are aware of medical consultative services which are available to them.
(12) Annually conduct a review of any hazardous materials being used.
(13) Annually review the CHP and update as needed.
(14) Maintain appropriate records/files for CHP compliance.
(15) Have all departments send copies of MSDS sheets for all purchased chemicals, with periodic updates.

(C) School CHP Contacts

(1) A school “Health & Safety” contact person shall be appointed yearly by the Principal and reported to the Chief Operating Officer NHBOE and Dr. Blosveren, the Health & Safety Officer.
(2) School contacts must maintain school “OSHA Files” and follow the CHP.
(3) Must contact the district Health and Safety [CHO] Officer with any issues of non-compliance.
(4) Annually inventory and ensure proper storage and use of hazardous chemicals. Proper disposal measures must be followed.
(5) Ensure that MSDS sheets are requested for all chemical purchases.
(6) Request as necessary maintenance on engineering control equipment.
(7) Ensure that chemicals are properly labeled.
(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 CHP.

(D) Teaching and Custodial Staff

(1) Use the engineering equipment provided and report malfunctions.
(2) Follow all district SOP’s.
(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.
(E) Nursing Staff

(1) Be familiar with chemicals in use and associated health hazards.
(2) Make any necessary contacts and medical referrals.

V. Standard Operating Procedures

(A) Chemical Procurement, Use and Storage

(1) All hazardous materials procurement/requests must be reviewed and approved by the on-site CHP representative. Any questions or clarifications can be made to Dr. Blosveren for final approval.
(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 as required by the district Hazard Communication Standard. A copy of this document must be kept in the school’s OSHA File.
(3) All Flammable materials must be properly stored in flammable cabinets. Note: Fume hoods are not to be used for storage of chemicals.
(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 solvents is not permitted.

(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) Open toed shoes/sandals are not permitted in areas where chemicals are being used.
(2) Wearing of shorts are 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.

(D) Personal Protective Equipment [PPE]

(1) Chemical resistant safety glasses/goggles must be worn when working with chemicals. {Connecticut General Statutes 10-214a}
(2) Gloves [neoprene is recommended], chemical aprons, and where necessary, shoe coverings must be worn when working with hazardous materials.

(E) Waste Disposal

(1) All waste materials should be stored in a designated disposal area.
(2) Waste containers should be labeled as required under OSHA regulations.
(3) 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.
(4) Only licensed pre-approved contractors and Dr. Blosveren shall be used to dispose of hazardous chemicals. [671-5135]
(5) Designated [major] waste storage areas should be equipped with spill control/containment equipment for temporary remedy until a licensed clean up team is 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 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.
(9) All electrical equipment must be grounded to code. Annual inspections of electrical equipment shall be conducted by the proper supervisor.
(10) When required special cabinets shall be used to protect employees from exposure to hazardous materials.
(11) All eyewashes must be flushed weekly. Water valves for eye wash and drench showers can not be turned off. Access to both must be unimpeded. Any malfunctioning should be reported immediately for remediation.

(G) Major Spills and Accidents

(1) CALL 911 !! Then call Dr. Blosveren at 671-5135 or Mike Barker [City of New Haven Risk Manager] at 627-4912.
(2) In the event of an accident the following procedures should be followed:
   (a) Eye Contact: flush at eye wash for 10-15 minutes, then 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 accidents seek medical attention.
   (d) In all cases notify your immediate supervisor and fill out an accident report form ASAP.
(3) In the event of a major spill [ie: a 100ml bottle or larger] of a hazardous chemical/material the following procedures should be followed:
(a) For flammable materials extinguish all sources of ignition.
(b) Isolate the area and use spill/absorption kits 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 MSDS. In ALL cases the MSDS 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 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 and medical opinions, and 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 and of any follow up medical evaluations that should be conducted.

VII. Employee Training/Inservicing

(A) The employees shall be periodically trained [suggested yearly] and certified about the following:
   (1) The existences, location, availability, and full contents of both the district “Chemical Hygiene Plan” and city “Hazard Communication Standard”.
   (3) Hazard information about the materials used including signs and symptoms of over exposure.
   (4) The location, availability and understanding of Material Safety Data Sheets “MSDS”.
   (5) The Medical Program.
(6) The district “Blood Borne Pathogen Plan” [BBPP].
(7) Emergency plans and procedures.
(8) District “Chemical Disposal Procedure”.
(9) CONNOSHA “Right To Know” document.

(B) A copy of the CHP, HCS, MSDSs, and all OSHA Regulation documents shall be available to employees during regular work time.

VIII. Recordkeeping

(A) All Training documents.
(B) All Monitoring documents
(C) All Accident/Incident and Form 300 reports.
(D) Any disciplinary actions.
(E) Engineering control service records.
(F) Disposal records with any DEP reports included.

IX. Plan Review and Revision

This plan shall be reviewed annually and revised when needed. It shall include:

(A) Plan effectiveness.
(B) Pertinent Records.
(C) Changes/Revisions recommended.
(D) Inservicing of staff for Recertification with documentation kept filed with the Health and safety Officer, the School central file, and a copy to the employees.

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