



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
(Access to Information About Hazardous
and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

- I. **PURPOSE:** To establish guidelines and procedures for implementation of the State of Maryland’s Access to Information About Hazardous and Toxic Substances Act, also known as the Right-To-Know Law. This law is enforced by Maryland Occupational Safety and Health (MOSH). Effective January 1, 2015, access to Material Safety Data Sheets (MSDS) will be available on-line through a contracted vendor, MSDS Online.

- II. **BACKGROUND:** The MOSH regulations enable employees to access certain information about hazardous materials in the workplace. In part, the law requires employers to: obtain information regarding chemical-containing or hazardous materials; compile and maintain an inventory of these materials; and provide training to employees who use, or are otherwise exposed to hazardous materials. This procedure is written to establish the school system’s “Hazard Communication Program” for compliance with all provisions of the Access to Information About Hazardous and Toxic Substances Law. Any information pertaining to the Law not covered in this procedure can be found in Maryland Occupational Safety and Health (MOSH) Law: Maryland Code, Labor and Employment Article, Title 5: Subtitle 4: Sections 5-401 through 5-410.

- III. **DEFINITIONS:** The following definitions apply to the contents of this Administrative Procedure.
 - A. **Chemical Information List** – An alphabetical listing of all hazardous materials used or stored in the workplace, including



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
(Access to Information About Hazardous
and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

chemical name and manufacturer.

- B. Hazardous Material – Any substance which has the capacity to produce personal injury or illness posing either a physical or health hazard through ingestion, inhalation, or absorption. Simply defined: any product that contains a “Caution,” “Warning,” or “Danger” label on its container.
- C. Health Hazard – Any substance for which there is statistically significant evidence that acute or chronic health effects may occur upon over exposure.
- D. Material Safety Data Sheet (MSDS) – Written material produced by a manufacturer containing vital safety information about their products.
- E. MSDS On-line – contracted vendor responsible for providing access to Material Safety Data Sheets through web-based inventory or e-binder found in PGCPS Staff Portal.
- F. Physical Hazard – Any substance for which there is evidence that it is a combustible liquid, compressed gas, explosive, flammable, or reactive.
- G. User Group – Any school, department, office, instructional program, or individual who buy, use, store, or approve hazardous materials for purchase.

IV. **PROCEDURES**: The Hazard Communication Program identifies schools, departments, instructional programs, or individuals that are responsible for coordinating the program and



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM (Access to Information About Hazardous and Toxic Substance)

2803

Procedure No.

Date

January 1, 2015

providing required employee training. It also defines the process for displaying, cataloging, and labeling hazardous materials, and making information available to employees.

A. PROGRAM COORDINATION

1. The Safety Office will serve as the overall coordinator for the Hazard Communication Program and act as liaison with user groups, MOSH and the Maryland Department of Environment.
2. All user groups, including schools, will be responsible for identifying hazardous materials used in their particular program or work location.
3. Each user group will appoint a coordinator for the Hazard Communication Program who will serve as liaison with the Safety Office. It will be the user group's responsibility to notify the Safety Office whenever a new coordinator is appointed.

B. CHEMICAL INFORMATION LIST

1. User groups will conduct a survey of their workplace or operation and compile an inventory of all hazardous products they use or store. Each group will prepare a list of products to contain the following:
 - (a) Common or trade name;



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
(Access to Information About Hazardous
and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

- (b) Chemical name;
 - (c) Manufacturer or vendor name; and
 - (d) Location where chemical is used or stored.
2. The chemical information list is to be arranged in alphabetical order according to common name.
3. A hazardous material introduced into the workplace that is not on a current chemical information list must be added within 30 days. It does not need to be placed in alphabetical order until the annual update. . New additions will be forwarded to MSDS Online for inclusion into the e-binder.
4. Products brought from home or purchased in limited quantities (one or two) do not have to be listed
5. User groups will submit an annual update of the chemical information list to the Safety Office on December 1 of each year beginning December 1, 2015 and every year thereafter. This list must be alphabetized by common name and include all products acquired in previous years, as well as all new products.
 - (a) The Safety Office will notify user groups when their update is due. (List should be kept up to date.)



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
(Access to Information About Hazardous
and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

- (b) A chemical product needs to be listed only once per work location. User groups who buy chemical products for use in all or multiple facilities need only list general locations such as: all schools, all high schools, all garages, all shops, etc.
 6. The Safety Office will consolidate lists from all user groups and submit an updated chemical information list for Prince George's County Public Schools to the Maryland Department of Environment, every two years.
 7. The Safety Office will keep chemical information lists on file for at least 40 years.
 8. See **Attachment 1** for a sample chemical information list.
- C. MATERIAL SAFETY DATA SHEET (MSDS)
1. For every item on a chemical information list, or hazardous product otherwise used in the system, a MSDS must be obtained and kept on file. MSDSs are available from manufacturers, vendors, and some retail/wholesale outlets, as required by the law.
 2. MSDS will be obtained by the Purchasing Department and forwarded to the Safety Office, when:



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
(Access to Information About Hazardous
and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

- (a) Products are purchased by contract. At the time a bid or contract award is issued, vendors must send MSDSs for all applicable products.
 - (b) Products are purchased by quotes. Vendors must send a MSDS at the time the order is submitted.
3. MSDS sheets will be obtained by user groups and forwarded to the Safety Office when:
 - (a) Products are acquired by purchase orders and/or quotes. Each group must request a MSDS at the time a product is ordered.
 - (b) School purchase, or otherwise acquire products themselves.
4. The Safety Office will maintain a master file of all MSDSs. It is recommended that each user group also keep copies on file.
5. See **Attachment 2** for “sample” Material Safety Data Sheet.

D. LABELING

1. Ultimate users of hazardous products must ensure that containers are properly labeled, tagged, or otherwise marked with the following:



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM (Access to Information About Hazardous and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

- (a) Product name, manufacturer's name and address;
 - (b) Identity of hazardous chemicals and directions for use; and
 - (c) Appropriate hazard warning.
2. If a product label is missing upon receipt, or has been removed before the container is empty, a temporary label must be affixed. This label (may be handwritten) must contain the same information as above. This also applies when material is transferred from the original container to another. Replacement labels may be printed from MSDS Online.

E. TRAINING AND EDUCATION

1. Each user group in conjunction with the Safety Office must provide a training and education program for its employees. This program should be designed to inform employees of the following:
 - (a) All hazard communication methods, including material safety data sheets, chemical information list, labeling, and training requirements.
 - (b) Employee rights and procedures for obtaining material safety data sheets or chemical information lists.



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM (Access to Information About Hazardous and Toxic Substance)

2803
Procedure No.

Date
January 1, 2015

- (c) The nature of hazards associated with using chemical-containing products in the workplace, including exposure and health effects.
 - (d) Appropriate practices regarding the use of hazardous substances including: personal protective equipment, waste disposal, and emergency procedures.
 2. Every employee that works in an area where hazardous substances are used or stored will be required to complete the training and education program. All new employees will be required to receive such training prior to their initial work assignment. As additional information pertaining to hazardous substances becomes available, or employees are routinely exposed to additional substances, each employee will receive supplemental training. The additional information will subsequently be incorporated into the overall training program.
 3. See **Attachment 3** for sample training program outline.

F. EMPLOYEE ACCESS TO INFORMATION

1. An employee or designated representative may request information about a hazardous product, MSDS, or chemical information list by contacting the Safety



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
(Access to Information About Hazardous
and Toxic Substance)

2803
Procedure No.

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Office or appropriate user group. Information must be provided to the employee at their work location within one 8-hour work shift after the request is made. In an emergency, this information may be faxed or emailed. Employee or designated representative may obtain MSDS through MSDS Online at any time, (accessible through Staff Portal.)

See **Attachment 4** for directions to access MSDS Online.

2. An employee or designated representative may also request a copy of a MSDS or chemical information list. One copy of the requested material must be provided at no charge within five (5) working days after the request is made. Where possible, the copy may be faxed or emailed to an employee at their specific work location. Employee or designated representative may obtain MSDS or Chemical Information List through MSDS Online at any time; accessible through Staff Portal.
3. In some circumstances it may be necessary to maintain MSDSs at a specific work site for immediate access in an emergency. However, it is not necessary to maintain MSDSs at all work locations, as long as copies can be faxed or emailed from the Safety Office or user group in an emergency. In an emergency, MSDS can be obtained at any time through MSDS Online, accessible through Staff Portal.



ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM
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2803
Procedure No.

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4. A Hazard Communication Program Notice must be displayed or posted at all work locations, informing employees of how and where they can obtain information regarding the program. This includes phone numbers to acquire MSDSs, chemical information lists, and directions to access MSDS Online **Attachment 5** should be posted so as to be available to all staff.

- V. **RELATED PROCEDURES:** None.

- VI. **MAINTENANCE AND UPDATE OF THESE PROCEDURES:** This Administrative Procedure originates with the Safety Office and will be reviewed and updated as needed.

- VII. **CANCELLATIONS AND SUPERSEDES:** This procedure cancels and supersedes the version dated July 1, 2000.

- VIII. **EFFECTIVE DATE:** January 1, 2015

Attachment 1 – Sample Chemical Information List
Attachment 2 – Sample Material Safety Data Sheet
Attachment 3– Sample Training Program Outline
Attachment 4 – Direction to access MSDS Online

Distribution: Lists 1, 2, 3, 4, 5, 6, 7, 10