Bethlehem Township Schools

WRITTEN HAZARDOUS COMMUNICATION PROGRAM
School Year 2025-2026

Policy and Administration

This notice is to inform you that the Bethlehem Township School District complies with the Public Employees Occupational Safety and Health Program Hazard Communication Standard (PEOSH HCS), N.J.A.C. 12:100-7, which New Jersey adopted with amendments, on May 3, 2004. Pursuant to said Standard, the District provides information about hazardous chemicals in the workplace, their associated hazards, and the methods for controlling these hazards. The following required elements of the Standard have been put in place:

1. A list of hazardous chemicals
2. Safety Data Sheets (SDSs) and Hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals
3. Labeled containers; and
4. A training program for employees who work with or have a potential for exposure to hazardous chemicals.

This written program applies to all work operations in our facilities where employees are exposed or may be exposed to hazardous chemicals or conditions under normal working operations or during foreseeable emergency situations.

The Head of Buildings and Grounds, Stuart Schendel, is the program coordinator who has overall responsibility for the written program and its annual review and update. The written program will be made available to employees within three days of request.

As required under the PEOSH HCS, employees will be informed of the contents of this program, the location and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from the hazardous chemicals. This information will be provided during employee training sessions and/or safety meetings.

List of Hazardous Chemicals

A list of hazardous chemicals found in all facilities has been prepared by the Head of Buildings and Grounds. This list is continually updated and is available upon request. Although not required by the PEOSH HCS, separate chemical list(s) have been prepared by RK Environmental Consultants as part of their contracted RTK Survey and are available for each work area.

Safety Data Sheets (SDS) and Hazardous Substance Fact Sheets (HSFS)

SDSs and HSFSs provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the SDSs are made readily accessible during each work shift to employees when they are in their work area. The Head of Buildings and Grounds obtains SDSs for all products containing hazardous chemicals and HSFSs on all hazardous chemicals, places copies of the SDSs in a binder in each work area of District facilities and maintains a master file of all the SDSs and HSFSs in his office. If additional information is needed about a hazardous chemical or product, if an SDS is missing, or if an SDS has not been supplied with the initial shipment, the Head of Buildings and Grounds will contact the manufacturer or supplier. The people listed below will ensure that the SDSs kept in each work area are updated as needed and the SDS binder is kept intact, and that HSFSs are updated as needed. As a policy of this District, an SDS and HSFS hard copy will be provided to the requesting employee immediately upon request, or within 3 working days of the request if the SDS or HSFS is not immediately available.

Thomas B. Conley Elementary School, Main Office	Stuart Schendel and Kirby Hendershot
Ethel Hoppock Middle School, Main Office	Stuart Schendel and Kirby Hendershot

Any new procedures or products that are planned to be used in this workplace must be approved by the Head of Buildings and Grounds before use to make sure that SDSs and HSFSs are obtained before use.

Labels and Warning Systems

The Head of Buildings and Grounds is responsible to ensure that each container of hazardous chemical(s) in all workplace(s) are properly labeled as required by the PEOSH HCS, and updates the labels as necessary if they should become illegible, fall off the container, or are obscured in any manner. Containers not bearing a PEOSH HCS label are not accepted by any of our facilities.

- Stationary containers in an area with similar contents and hazards have signs posted on or above them to convey the hazard information.

- Employees transferring hazardous materials from a labeled container to a portable container intended only for their immediate use during the work shift, do not have to label the portable container. If the portable container is stored beyond the employee's shift, or will be used by other workers, the employee labels the portable container with the PEOSH HCS information from the properly labeled larger container.

Employee Training

Every employee who works with or has the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies will receive initial and refresher training under the PEOSH Hazard Communication Standard on the safe use of those hazardous

chemicals. The Head of Buildings and Grounds is responsible for providing said training. A training program that uses both audiovisual materials and classroom instruction has been prepared for this purpose.

- Trainer(s) must meet the definition of a technically qualified person.

- Whenever a new hazard is introduced into the work area, an additional training session is provided for workers in a scheduled safety meeting conducted by the Head of Buildings and Grounds prior to beginning work with the new hazardous material. Supervisors notify employees about the safety meetings.

- **Refresher training,** an abbreviated version of initial training, is conducted every two years. Supervisors notify employees when the training session is scheduled, and a notice is placed on the bulletin board inside the break room.

- **Attendance is mandatory at all training sessions** for those workers identified as exposed or having the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies.

- Training is provided at no cost to the employee and is provided during working hours. The training is appropriate in content and vocabulary to the educational level, literacy and language of the employees.

- The documentation of training required by PEOSH HCS is maintained in the Bethlehem Township Business Office Central File.

As a general policy over all facilities, Custodians receive supplemental training from selected manufacturers' representatives when specialty equipment and materials are purchased. This provides an opportunity to have employee questions answered, as well daily monitoring of safe work practices.

The **initial training session** includes the following discussion items:

1. An explanation of the PEOSH Hazard Communication Standard and this written program;

2. Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity, etc.) and methods used in this workplace to detect the presence or release of hazardous chemicals (including the chemicals in piping systems);

3. Physical hazards of chemicals such as the potential for fire and explosion

4. Health hazards (both acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using SDSs and HSFSs

5. Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks

6. Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks

7. The location of and responsible person for maintaining SDSs, HSFSs, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information

8. An explanation of the applicable provisions of the Worker and Community Right To Know Act;

9. How to read and interpret the information on PEOSH HCS and RTK labels, HSFSs and SDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL;

10. A copy of the RTK brochure is handed out during training.

The initial and refresher training programs for employees are reviewed annually by the trainer. As part of the assessment of the training program, input from employees regarding the training they have received and suggestions for improving the training are obtained through training evaluation forms.

Employee **refresher training** is an abbreviated version of the initial training, and includes a discussion of the following information:

1. An explanation of any changes in the written program, PEOSH HCS, or RTK Act.

2. Changes in products used or work processes that may cause exposure to hazardous chemicals.

3. A review of health hazards, chemical and physical properties of the hazardous chemicals, and control methods of any routinely-used hazardous materials and any new hazardous materials to which the employees may be exposed. The SDSs and HSFSs will be used to review information pertaining to hazardous chemicals.

4. A review of the facility's health and safety policy and procedure manual.

5. A copy of the RTK brochure is distributed.

Contractor Employees

The Head of Buildings and Grounds advises outside contractors in person of any/all chemical hazards that may be encountered in the normal course of their work on the site, the labeling systems in use, protective measures to be taken, the location and availability of SDSs, HSFSs, and other health hazard information, and the safe handling procedures to be used for these materials.

It is our policy that each outside contractor who brings hazardous chemicals on our site(s) will provide the Head of Buildings and Grounds with copies of appropriate SDSs for the hazardous chemicals, information on any special labels used, and precautionary measures to be taken while working with or around their hazardous chemicals or products.

All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS, applicable SDSs and HSFSs, and other chemical information from Head of Buildings and Grounds, Stuart Schendel.

Reviewed and Approved: 9/2/25

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Business Administrator/Board Secretary

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Head of Buildings and Grounds