

Hazard Communication Program

Naatsis'Aan Community School Inc.

P.O. Box 10010
Navajo Mountain, Utah, 86044

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HAZARD COMMUNICATION PROGRAM

INTRODUCTION

The Occupational Safety and Health Administration (OSHA) within the U.S. Department of Labor has issued requirements to ensure that information necessary for the safe use, handling, and storage of hazardous chemicals is provided for and made available to employees. This information is contained in Title 29 of the Code of Federal Regulations (CFR), Part 1910, Standard Number 1910.1200, "Hazard Communication." One of the requirements of the "Hazard Communication Standard" (HCS) is that each employer must have a written "Hazard Communication Program" (HCP) detailing how they will comply with the requirements of the standard. This document addresses those requirements for Naatsis'Aan Community School, Inc.

PURPOSE

This Hazard Communication Program is intended to comprehensively address the evaluation of the potential hazards of chemical-based products, to communicate information concerning hazards and appropriate protective measures to employees, and to preempt any legal requirements of a state or political subdivision of a state pertaining to this subject.

GENERAL

- A) The Occupational Safety and Health Protection Program for Bureau of Indian Affairs (BIA) employees is to be posted in an Employee Information Center and/or posted on the safety bulletin board. The Employee Information Center at Naatsis'Aan Community School, Inc. is Outside of the main office in building 520.
- B) The HCP is to be kept in the workplace, co-located with the Standard Operating Procedures (SOP) and shall be made immediately available to any employee.
- C) A current and up-to-date Chemical Inventory List (CIL) is attached as Appendix A to this document; another copy of the CIL shall be maintained by the Facility Manager in the Facility Management Office and shall be available to employees. A copy of the CIL will be sent to the Fort Defiance Navajo Agency Safety Officer whenever it is updated. (NOTE: An update is required whenever a new chemical is obtained.)
- D) A Hazardous Materials Handler (HMH) is appointed by the Naatsis'Aan Community School, Inc. Principal and is responsible for receiving hazardous substances at the Facility. Appendix B contains a letter appointing the HMH and his/her additional responsibilities.
- E) Any product containing chemical(s) brought into the workplace is to be accompanied by, or already have on file, a Material Safety Data Sheet (MSDS). When products are to be purchased, the requester and procurement clerk will specifically note on the purchase order that MSDSs are to be provided by the vendor. Products containing chemicals will not be accepted on the site until an MSDS is available and the Hazardous Materials Handler or Facility Manager has made an evaluation to determine the degree of hazard. Copies of MSDSs for chemicals will be provided to the Agency Safety Officer. If problems arise in

obtaining an MSDS from a supplier, the Facility Manager will notify The Fort Defiance Navajo Agency Safety Officer. If these efforts fail to produce an MSDS, the Regional Contracting Officer will be notified. A purchase without an MSDS shall not be permitted.

- F) Employees will be provided information on hazardous chemicals in their work area at the time of initial assignment, whenever a new hazardous chemical is introduced into their area, and annually thereafter. The annual training session must be attended by all employees. Training verification forms will be signed by each employee upon completion of their training and will be maintained in the Facility Manager's Office. This training will consist of classroom training using the MSDS as the primary teaching aid. The labeling system used will be explained, and examples will be given. A flowchart of the facility will be posted or explained with special attention to hazardous chemicals in systems and hazardous materials associated with piping. The methods for handling and detecting the presence of chemicals will be stressed. The Facility Manager is responsible for the training portion of this program. New hires and temporary employees will be given the HCP to review before beginning work, and the Facility Manager will question them on the content before beginning work.
- G) Receipt of all products containing chemical(s) will only be made by a properly designated and trained HMH (see Appendix B). All other personnel at Naatsis'Aan Community School Inc. are prohibited from receiving any products containing chemical(s). All procured items, both liquid and nonliquid, will be received and handled by applicable public laws, codes, and regulations.
- H) The provisions of this document apply to all items noted on the CIL, regardless of storage area/type.

RESPONSIBLE STAFF

Naatsis'Aan Community School, Inc. Facility Manager, and other supervisors and leaders are directly responsible for ensuring that the HCP is applied. The Navajo Region Branch of Environmental Services (NRBES), Regional Safety Officer, Agency Safety Officers, Regional Fire Marshall, U.S. Environmental Protection Agency (USEPA), Navajo Nation EPA (NNEPA), U.S. OSHA, and Navajo Nation OSHA can inspect for adherence to the program. The last four agencies are legally authorized to issue enforceable citations and Notices of Non-Compliance.

COMMUNICATION STANDARDS

- A) Chemical Inventory
 - 1) The Facility Manager and/or the HMH maintain an inventory of all known chemicals in use at the facility, tenant areas, and temporary work sites.
 - 2) All chemical-based products brought into the Facility will be included on the CIL.
 - 3) Chemicals on the CIL will be cross-referenced with the appropriate MSDS.
 - 4) A copy of each workplace CIL and MSDSs for chemicals, produced chemicals, or process streams will be maintained by the Agency Safety Officer.

B) Procedures for the Procurement of Hazardous Products/Chemicals

- 1) The statement, "A Material Safety Data Sheet (MSDS) is required for each chemical or product containing chemicals," shall be typed or written on all purchase orders for products that might contain chemicals.
- 2) The Assistant Secretary of Indian Affairs (ASIA) has specifically forbidden the receipt of chemical-based products from other federal entities by the BIA. Products containing chemical(s) will only be purchased from legitimate vendors and common carriers in a manner consistent with and conforming to all applicable public laws, codes, and regulations. Distribution and use of these products within Naatsis'Aan Community School, Inc. will follow these same codes, laws, and regulations.

C) Procedures for the Receipt of Hazardous Products/Chemicals

- 1) Liquid Products: Typical products in this category include bulk fuels, paints in small-volume containers, aerosol paints, boiler cleaners, water treatment chemicals, some adhesives, solvents, thinners, and many varieties of chemical reagents used in instruction. All shipments of liquid products will be examined in an area removed from workers and students by the authorized HMH. The HMH will review the manifest, or purchase order, to determine if the product is intended for the facility, the type of material received, and the size of containers, and will check for an MSDS. Should a container be damaged, bulging, or leaking, the product will not be retained. If the shipment is acceptable, the product will be directed to the storage area. Flammable liquids will be transferred to industry-approved, specially marked metal storage lockers, and hypochlorite compounds will be transferred to secure ventilated storage areas inaccessible to other workers and students. **Under no circumstances will petroleum products be stored with nitrates or chlorine compounds. All damaged, expired chemicals will be discarded by NCS, Inc. and returned to the vendor.**
- 2) Non-Liquid Products: Typical products in this category include new dry batteries, granular hypochlorite, some pesticides, and some reagents and cleansers. These materials will be received, inventoried, and stored using the same procedures as above. In particular, granular hypochlorite in paper drums must be stored in such a manner as to not be allowed to get wet. The HMH shall ensure that reactive products are properly protected. For example, a water-reactive chemical such as calcium carbide should be double sealed in waterproof containers, and the containers marked "WATER REACTIVE."
- 3) Fueling Operations: When bulk fuels are being delivered, a representative of the Facility will stay with the driver of the delivery truck to ensure that tanks are not overfilled and that any leaks or spills are immediately remediated. As soon as possible, all tanks that routinely hold and discharge liquids will have outside gauges installed to accurately express the contents of the tank. Until this modification is accomplished, the volume of existing storage tanks is to be monitored using a calibrated "dipstick." Such monitoring is performed before and after fuel additions or removals. The tank is also monitored late Friday afternoon and early Monday morning to ensure no loss/leakage occurred over the weekend. Readings are recorded in a weekly "amount" ledger and are initialed by the individual taking the reading. Any modifications to this schedule and/or method will be

noted in this HCP. For more information on fuel storage, see the Spill Prevention Control and Countermeasures (SPCC) Plan.

D) Container Labeling

- 1) The HMH is responsible for ensuring that all containers that she/he takes delivery and keep labels identifying their contents. All illegible labels will be replaced. If an illegible or unlabeled container is found, the Facility Manager shall be notified.
- 2) All chemical-containing products will be stored in their original or approved storage containers with a proper label attached. The only exception is small quantities of products intended for immediate use, such as cleaning supplies used per instruction.
- 3) Workers may dispense chemical-containing products from original containers only in small quantities intended for immediate use. Any product left after work is completed must be returned to the original container or the immediate supervisor for proper handling.
- 4) No unmarked containers of any size are to be left unattended in the workplace.
- 5) Personnel at Naatsis'Aan Community School, Inc. will rely on manufacturer-applied labels whenever possible and will ensure that each container is labeled, noting the hazardous chemical contained therein and any appropriate hazard warnings.
- 6) Containers that are not labeled or from which the manufacturer's label has been removed will be re-labeled immediately if the content is known.
- 7) If any product containers are found within facilities or work areas without a proper label, and there is any uncertainty regarding the contents of these containers, the container(s) shall be isolated from employees and students until a determination of the contents has been made. This may require sampling and testing by a certified and trained individual. A listing of contractors capable of performing these services will be maintained by the Agency Safety Officer and NRBES. Normally, emergency services are provided by NRBES.

E) Building Labels

All buildings, lockers, and rooms used as storage facilities for chemical-based products shall have an appropriate National Fire Protection Association (NFPA) placard on the outside to provide notice of the most hazardous products contained within the unit (see Appendix F). This placard is to advise emergency personnel of the hazardous product(s) they might encounter, thus enabling them to properly protect themselves.

F) Storage Tanks

- 1) Aboveground Storage Tanks: All aboveground storage tanks will be marked as to the contents. They shall have locking nozzles, locking filling ports, and external capacity gauges. A secondary containment system will be installed under each tank or tank battery with a capacity sufficient to contain 110 percent of the capacity of the tanks. If a secondary containment system is made of shaped soil, it shall be lined with an

impermeable geosynthetic membrane. For further information on the above-ground tanks at Naatsis' Aan Community School, Inc., [see the SPCC Plan.](#)

- 2) Underground Storage Tanks: All underground storage tank covers will be marked as to the contents. Underground storage tanks are frequently found in faculty quarters. Though USEPA has published compliance exemptions for heating oil tanks, the NNEPA regulates underground storage tanks for heating oil. Naatsis' Aan Community School, Inc. Facility Management shall use the requirements of 40 CFR 280 as a guide but shall comply with all NNEPA regulations for heating oil storage tanks. An inventory system will be established with a schedule for gauging. If inventories cannot be balanced, or the ground around a tank is soft, stained, and odorous, it is a possible indication of leakage, and the tank should be investigated. Agency Facility Management or BES can arrange for these investigations. NOTE: NOT APPLICABLE TO THIS SCHOOL.
- 3) Liquid Petroleum Gas (LPG): Many facilities use fuel tanks with LPG. There are unique hazards to LPG. The gas is highly flammable, explosive, and can asphyxiate. LPG tanks shall be evaluated weekly to determine if there are leaks. Any flaws in an LPG system should be reported immediately to the Agency Safety Officer and Regional Facility Management. Only authorized vendors should attempt repairs to LPG systems.

G) Chemical Evaluation Procedures

- 1) All chemicals or products containing chemicals brought into the workplace will be evaluated by the HMH to determine whether they are hazardous. MSDSs or a manufacturer's notice of safety will accompany all first-time deliveries of any chemical or product containing chemicals. If an HMH needs assistance determining whether a chemical presents a hazard, she/he is to contact the Western Navajo Agency Safety Officer or NRBES.
- 2) Expired Products: Many products supplied by the General Services Administration (GSA) have a re-inspection date posted on the container, Reagents may have a shelf life. If a product is held past the re-inspection date, the custodians shall notify the Facility Manager, who shall contact GSA and ascertain whether the product is still usable or must be designated a waste. If the product is verified as still usable, a new re-inspection date shall be placed on the container with a note stating who was the approving authority. This notation should also be recorded in the active inventory maintained by the custodians or HMH.

H) Material Safety Data Sheets (MSDS)

- 1) The Facility Manager is responsible for obtaining and maintaining the MSDS file at Naatsis' Aan Community School, Inc. The Facility Manager will contact the chemical manufacturer or vendor if additional research is necessary. All new procurement of chemicals for Naatsis' Aan Community School, Inc. must be reported to the Facilities Management Office and Agency safety officer.
- 2) Employees working with any product may request to review the MSDS to determine if a hazardous chemical is part of the formulation. Requests will be made to their immediate supervisor and shall not be refused.

- 3) All MSDSs will be accessible and available to employees in the individual work areas within the facilities.
- 4) **CHEMTREC (1-800-262-8200)** can be contacted to obtain MSDS information on an emergency basis.

I) Employee Training

- 1) Employees will be trained to work safely with hazardous products and to make proper responses to spills/releases. Some employee training will be generalized, i.e., Hazardous Waste Operations and Emergency Response (HAZWOPER) and Resource Conservation and Recovery Act (RCRA) familiarization, but other training, Hazardous Material Handler [HM-126(f)], Hazardous Materials Specialist (HMS), and Incident Commander, (IC), are specialized.
- 2) The purpose of training is to learn to work safely with hazardous chemicals and to respond properly when the product is involved in an accident. Training will include:
 - a) Methods that may be used to detect a release of hazardous chemical(s) in the workplace.
 - b) Physical and health hazards associated with work-related chemicals.
 - c) Protective measures are to be taken.
 - d) Safe work practices, emergency responses, and use of personal protective equipment (PPE).
 - e) Information on the Hazard Communication Standard (HCS), including:
 - f) Labeling and warning systems and
 - g) An explanation of MSDSs
- 3) Job-specific training will include the duties of an Incident Commander, an HMS, and an HMH.
- 4) Generalized training will include First Responder/Awareness Level and First Responder/Operations Level.
- 5) Employees transferred to a different position or work area will be informed and trained regarding the new chemicals with which they will be working.

J) Personal Protective Equipment (PPE)

- 1) PPE is equipment issued to the employee by management to protect the health and safety of that employee against physical and chemical hazards. The level of equipment selected for any task will be determined by the Facility Manager after consulting the MSDS and will be based on the identity of the hazard and paths of exposure, i.e., dermal, inhalation, or ingestion. BES may be consulted in this decision. Any employee may upgrade to the next highest level of protection if it is available, if the person is qualified (i.e., fit-tested), and if the use is within the policies of the BIA. OSHA recognizes the following levels of PPE:
 - a) Level A: Used when the greatest level of skin, respiratory, and eye protection is required. It is Regional Policy that no Navajo Region personnel shall perform tasks that require Level A PPE.

- b) Level B: The highest level of respiratory protection is necessary, but a lesser level of skin protection is needed. It is Regional Policy that Office of Indian Education Programs (OIEP) personnel should not perform duties that require this level of PPE. Exceptions are made if the employee requires this equipment to service boilers or water systems. Another exception is those Facility Management personnel assigned as part of an Emergency Response team. These personnel shall work under the direction of designated experts in response actions. Level B PPE consists of the following:
- Positive pressure, full-face, self-contained breathing apparatus (SCBA) with a five-minute alarm.
 - Inner and outer chemical-resistant gloves.
 - Chemically impermeable coveralls with hoods.
 - Chemical-resistant boots or high-top booties.
 - Boots and outer gloves taped to the ankle and sleeve of the impermeable coverall with duct tape.
 - Hard hat if there are overhead objects or vertical walls.
- c) Level C: For this level of protection, the concentration(s) and type(s) of airborne substance(s) are known, and the criteria for using an air-purifying respirator are met. This should be the highest level required for OIEP Level C PPE consists of:
- Full-face air purifying respirator with appropriate cartridges and high-efficiency particulate air (HEPA) filter.
 - Inner and outer chemical-resistant gloves.
 - Chemically treated coveralls, or Tyvek® suit, with hood depending on the threat.
 - Chemically resistant steel-toed boots or booties over steel-toed boots.
 - Hard hat, if applicable.
- d) Level D: D-This level of PPE provides minimal protection and is used for nuisance contamination only. Level D PPE consists of the work uniform with steel-toed boots.
- e) Level D Modified: This level of protection falls between Levels C and D and is used when more skin protection is required, but respiratory protection is not. Examples of additional protection include latex under gloves, heavy outer work gloves, face shield or safety goggles, splash apron, and hard hat, as applicable.

- 2) The employee will be responsible for the proper maintenance of the issued PPE. The facility Incident Commander or designee will inspect all PPE intended for respiratory protection before and after use and before its return to storage. (See Appendix C for a letter designating the Incident Commander). Otherwise, the Facility Manager will inspect all PPE annually to determine serviceability. Inspection results will be noted in the SOP binder.
- 3) Any employee found in violation of PPE requirements may be subject to actions up to and including discharge.

K) Emergency Response Actions

- 1) Any incident of overexposure or spill/release of a hazardous chemical/substance must be reported to the Naatsis'Aan Community School, Inc. Facility Manager and/or Incident

Commander at once. The Facility Manager and other supervisory personnel will notify the Incident Commander.

- 2) The Incident Commander will be responsible for ensuring that proper emergency response actions are taken in spill/release situations. The Incident Commander shall contact the Federal On-Scene Coordinator (FOSC) to determine whether support from the Regional Office is necessary. A list of personnel to contact in emergencies is contained in Appendix D.
- 3) The duly appointed and trained Incident Commander is responsible for the Spill Response Team at Naatsis'Aan Community School, Inc. The Agency Fire Marshall and Facility Manager will be expected to assist the Incident Commander in all ways possible. Only agency personnel and employees who are properly equipped and trained and are enrolled in a medical surveillance program, plus fit tested for respirators, may respond to spills/releases. Refer to the Regional Emergency Response Plan.
- 4) If a spill/release occurs, the affected area will be immediately contained and cordoned. Access to the area by employees, students, and residents will be severely restricted until the necessary corrective action has been completed by either the Spill Response Team or by trained and certified personnel, depending upon the degree of the hazard. An approved certified contractor acquired by the FOSC shall be used if necessary.
- 5) Disposal of waste from emergency responses normally will be handled by NRBES.

L) Hazards of Non-Routine Tasks

- 1) The Facility Manager will inform and train employees regarding any special tasks that may arise that would involve possible exposure to hazardous chemicals, including the procedures to be observed to minimize these exposures. Examples are flushing boilers, painting with lead-based paint, chipping or sanding metal-based paints, and de-scaling swamp coolers.
 - a) Servicing Boilers: Most boiler cleaner products are strongly corrosive and release fumes, which can be highly injurious to mucus membranes. Spills of these products must be neutralized before cleanup. No one should handle the product or remediate spills without proper respiratory and/or dermal protection in accordance with the MSDS. Boiler cleaner products should be completely used before disposal of the containers. Containers should not be transferred to private individuals. Empty containers, as defined in 40 CFR 261.7, may be disposed of as solid waste.
 - b) Water Treatment Maintenance: Hypochlorite compounds will be kept in secured facilities protected from the weather. No one should enter the storage area or handle the product without proper respiratory and dermal protection by the MSDS. If an incident occurs where it is suspected there has been an extreme release of chlorine gas, NRBES shall be immediately notified.
 - c) Painting Operations: All paints should be considered hazardous substances until proven otherwise. Therefore, excessive inhalation of fumes from paints should be avoided. Pressurized spray paints, in particular, are known to have volatile and/or

- hazardous propellants. Off-spec, outdated, and adulterated paints shall be considered hazardous waste and shall be treated as such. Paint waste, especially those mixed with thinners and/or oils, may be retained for no longer than 90 days. Lead-based paint has been banned since 1978.
- d) Pesticide Operations: Pesticides are another category of special products, many of which are designated as toxic by the USEPA. Pesticides shall not be applied in classrooms or dormitories when children are present, nor may open containers of pesticides be retained in an office. Pesticide applicators shall be licensed by either the Navajo Nation or the States of New Mexico, Arizona, or Utah. Storage shall be in a secure area with notices by the MSDS. Residues of pesticides shall be disposed of by the MSDS or by transfer to the Regional Pesticides Crew or NRBES.
 - e) Treated Timber: Treated Lumber frequently contains copper arsenate and/or cresols. Should treated lumber be received at the facility, it is placed on pallets inside a secondary containment consisting of bermed soil covered by a geosynthetic membrane of at least ten mils in thickness. Treated lumber shall be covered to protect it from the elements and prevent the potential generation of hazardous liquids from rainwater leaching. USEPA has recently (January 2002) issued health advisories on the use of treated timber. Personnel handling or using such lumber shall wear latex gloves and dust masks when cutting or shaping the lumber. Scraps should never be burned.
 - f) Pressurized Products: Many aerosols, paints, rust removers, oven cleaners, etc., have propellants that have been designated as hazardous substances. If such products become damaged to the point that all the contents cannot be utilized, the residues should be treated as hazardous waste. This is particularly true of aerosol pesticides. If there is doubt whether a product has become a hazardous waste, NRBES shall be contacted.
 - g) Pressurized Industrial Gases: All containers of pressurized industrial gases shall be properly secured per guidance from the Compressed Gas Association Pamphlet P-1-1965 and OSHA 29 CFR 1910.101-105. At a minimum, they shall be chained to a wall or mounted in a portable carriage and locked away when not in use. All gauges or meters shall be removed when not in use. The valve protection cap shall be in place.
 - h) Explosives: There is no reason for explosives to ever be stored at a school. If such material is discovered or suspected, the Agency Safety Officer and Regional Safety Officer shall be notified immediately.
 - i) Confined Space Entry: There is a Confined Space Entry Program and instruction manual for facilities in the Navajo Region. All confined space entries will be made in accordance with that manual. Each facility is responsible for the maintenance of the manual.
- 2) Employees will be informed of possible exposure hazards in nonroutine tasks by pre-job meetings and a visit to the expected area of operations.
 - 3) A review of safe work procedures and the use of required PPE will be conducted before the start of such tasks. Where necessary, areas will be posted to indicate the nature of the hazard involved.

- 4) Sign-off sheets for nonroutine tasks will be kept in the Naatsis' Aan Community School, Inc. Facility Management and/or Administration Office.

M) Informing Other Employers (contractors and sub-contractors)

- 1) Contractors will be briefed on the content of the Naatsis' Aan Community School, Inc. HCP, and a copy of the HCP will be provided. After the program has been explained, the contractor is required to sign a release form.
- 2) Information on hazardous chemicals known to be present will be exchanged with contractors. Contractors and sub-contractors will be responsible for providing necessary information/equipment to their employees and the Naatsis' Aan Community School, Inc. Facility Manager.
- 3) During a pre-construction meeting or equivalent, the contractor will provide an MSDS for any hazardous chemical that the contractor will use. School employees in that work area will be apprised of new developments, and the MSDSs will be reviewed with them.
- 4) Contractors are required to adhere to the provisions of the HCP while on the site.
- 5) If a contractor brings hazardous chemicals to the school grounds, she/he shall provide a storage unit, clean up any spills, and properly dispose of contaminated medium/material. The contractor will provide secondary containment for any hazardous liquids brought onto the facility grounds and security for their products. The rubble or non-hazardous waste generated by a contractor shall not be disposed of in any BIA or Tribally owned landfill, or school dumpster, nor in any arroyo or excavation within the reservation.
- 6) Sign-off sheets will be kept with the job order and on file in the Naatsis' Aan Community School, Inc. Facility Management Office.

N) Hazardous Waste Disposal

- 1) Used petroleum products, spent solvents, used antifreeze, and other hazardous waste will be collected in approved, designated receptacles. There shall be no mixing of hazardous waste types, e.g., chemical reagents used in instruction and used oil, acids and bases, and oxidizers.
- 2) Disposal of hazardous waste will be performed only by a licensed, certified contractor employing proper disposal procedures. This contractor shall provide all of the required documentation for proper disposal procedures required by the various public laws, codes, and regulations. Contact Agency Facility Management or Regional NRBES for guidance on proper disposal.
- 3) If Naatsis' Aan Community School, Inc. HMH and Response Personnel are qualified and equipped, they may place the waste material in approved containers and arrange, through NRBES, for proper disposal. If qualified and equipped personnel are not available, waste should be cordoned from the public and left where generated.

O) Inspections of Handling and Storage Areas

- 1) Inspections of the handling and storage of products containing chemical(s) will be conducted at least annually and may be unannounced. Inspections may be performed by staff of the Regional Facility Manager, Agency Facility Manager, Regional or Agency Safety Officers, Regional Fire Marshall, NRBES Regional Scientist, USEPA, NNEPA, or a contractor retained by the Central or Regional Office.
- 2) Whenever possible, advance notice of an impending inspection will be given to the Principal; however, regulatory agencies are not obligated to notify.
- 3) In the case of inspections by nonregulatory agencies, an out-briefing will be given after the inspection, and a written report of the inspection will be furnished to the Agency's Education Line Officer. Each written report shall contain the specific deficiency observed; the building, room number, and specific physical location of the deficiency; the code, law, or regulation defining the deficiency by paragraph and subparagraph(s); the corrective action required; and a risk assessment category and rank of each deficiency. Funding of corrective actions is normally the responsibility of the program found to be deficient.
- 4) In cases where the deficiency is Immediately Dangerous to Life and Health (IDLH), the facility will address it with emergency funding. Otherwise, the financial burden shall be reported by the Facility Manager for inclusion in the MAXIMO within 30 calendar days of the receipt of the written report of each inspection. An abatement plan, including costs and funding information, shall be prepared and encoded into the same system by the Facility Manager within 45 calendar days of each inspection.
- 5) In the case of IDLH situations, the NRBES office should also be notified, as NRBES will often correct these problems on an emergency basis.
- 6) The Agency Safety Officer shall provide routine assistance to Western Navajo Agency Facilities. The Regional NRBES office will also provide technical assistance as needed.

Appendix B

Letters of Designation for Individuals

***Naatsis'Aan Community
School, Inc.***



Naatsis'Aan Community School, Inc.
P.O. Box 10010
Navajo Mountain, UT. 86044
Telephone: (928) 672-2335
Fax: (928) 672-2609
Website: ncswarriors.org



MEMORANDUM

TO: Mr. Alex Gishie, Jr., Groundsman (

FROM: Ms. Helena Botone, Principal

SUBJECT: Appointment of Designated Hazardous Materials Handler

DATE: January 7, 2025

Mr. Alex Gishie Jr., you are hereby designated as the Hazardous Materials Handler for Naatsis'Aan Community School, Inc. To perform the duties inherent in this position you will be trained per HM 126 (f) HM 181, or equivalent course IAW OSHA 29 CFR 1910.120. This designation was made in accordance with your duty description. You will perform this duty primarily at Naatsis'Aan Community School, Inc., but services may be required in other non-specific locations in support of education programs. Your tour of duty is concurrent with your current hours, though there may be emergency on-call situations.

You have, or will shortly receive, the training necessary to perform your added duties. These duties shall be performed in accordance with all applicable public laws, codes, and regulations. In addition, you are required to read, understand, and follow the guidance contained in the Naatsis'Aan Community School's Hazard Communication Program and the Standard Operating Procedures.

You shall be required to have at your job site a copy of the current Chemical Inventory List (CIL) for Naatsis'Aan Community School, Inc. and the associated Material Safety Data Sheets (MSDS). You are not to accept from any carrier, products containing chemical(s) if they do not contain a MSDS. If you have any questions concerning these items, contact the Facility Manager and Principal.

Should you have any questions pertaining to this assignment, contact me in my office. Your understanding and adherence to this assignment are appreciated. Thank you.

ACKNOWLEDGEMENT:

Mr. Alex Gishie, Jr.
Groundsman

Naatsis'Aan Community School, Inc.



Naatsis'Aan Community School, Inc.
P.O. Box 10010
Navajo Mountain, UT. 86044
Telephone: (928) 672-2335
Fax: (928) 672-2609
Website: ncswarriors.org

MEMORANDUM

TO: Mr. Robertson Yazzie, Facility Manager

FROM: Ms. Helena Botone, Principal

SUBJECT: Appointment of First Responder/Operations Level

DATE: January 7, 2025

Mr. Robertson Yazzie, you are hereby designated as the First Respondent/Operations Level for Naatsis'Aan Community School, Inc., to perform the duties inherent in this position, you will train in Hazardous Waste Operations and Emergency Response by OSHA 29 CFR 170-172 or equivalent courses. This designation will be included in your job duty description.

You will perform this duty primarily with Naatsis'Aan Community School, Inc., but your services may be required in other non-specific locations in support of BIA programs. Your tour of duty is concurrent with your current hours, though there may be emergency on-call situations.

You have or will shortly receive the training necessary to perform your added duties. These duties shall be performed by all applicable public laws, codes, and regulations. In addition, you are required to read, understand, and follow the guidance contained in the Naatsis'Aan Community School's Hazard Communication Program and the Standard Operation Procedures.

Should you have any questions pertaining to this assignment, contact me in my office. Your understanding and adherence to this assignment are appreciated. Thank you.

ACKNOWLEDGEMENT:

Mr. Robertson Yazzie, Facility Manager

Appendix C

List of Emergency Notifications

In the event of an emergency at Naatsis' Aan Community School, Inc., the following points of contact are established.

Team Leader	Principal	Helena Botone	623-203-0630
Alternate #2	Facility Manager	Robertson Yazzie	505-571-9009
Alternate #3	Security	Vacant	
Alternate #4	Maintenance Technician	Alex Gishie Jr.	928714-6143
Alternate #5	Business Manager	Dedra Begay	928-255-3231
Alternate #6	Food Service Employee	Etta Holgate	928-927-2025
Alternate #7	Residential Supervisor	Michael King	928-640-2745

If all of the above individuals are unavailable for assistance, contact the following.

Edee Morris	Educational Program Administrator	
928-871-5936	Facility Manager	928-283-2321
Vacant		
Leroy Begay	Facility Operation Specialist	

If none of the above personnel are available, contact the following personnel for assistance.

Sharon Pinto	Regional Director Deputy Director Regional Roads Engineer Regional Facility Manager
	Regional Property Management Regional Safety Manager Environmental Specialist

Appendix D

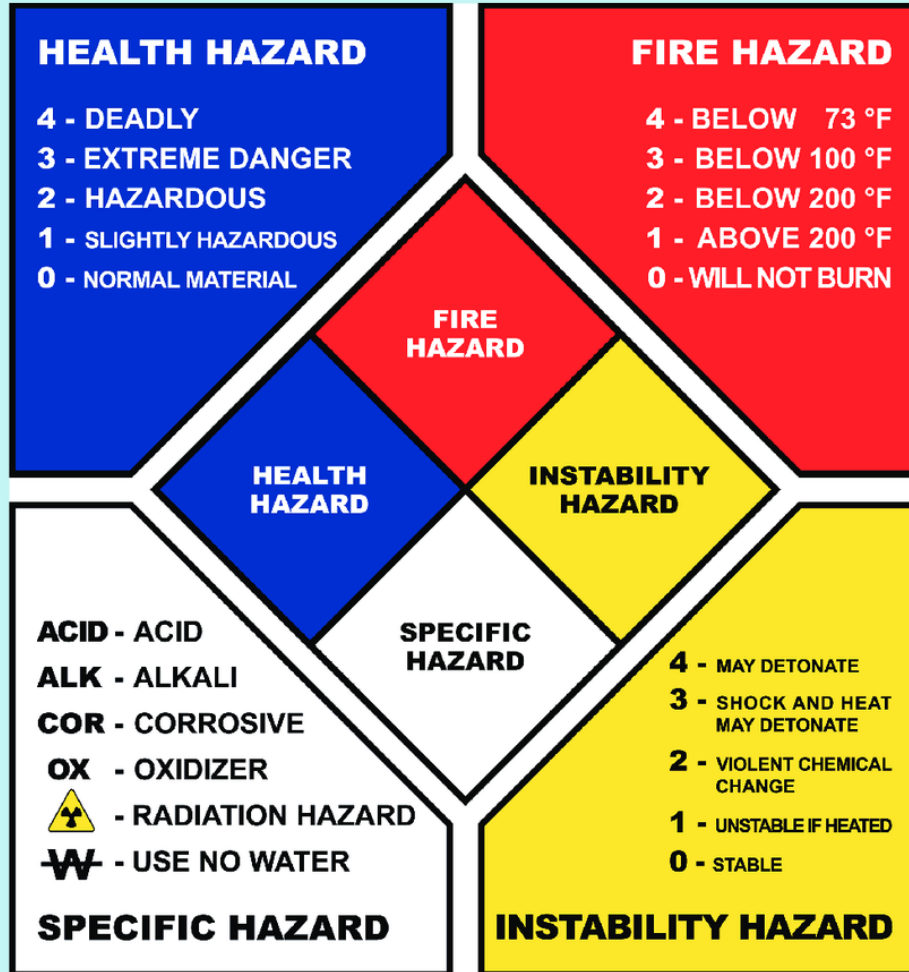
Locations of Fuel Storage Tanks



Appendix E

National Fire Protection Association Diamond (NFPAD)


The NFPA Hazard Diamond identifies the specific hazards of a material and the severity of the hazard that would occur during an emergency response.



Evacynady/stock.adobe.com


Appendix F

Examples of Labels and Marking and Placards



HAZARDOUS MATERIALS LABELING, PLACARDING, & MARKINGS
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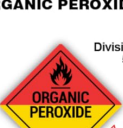



USE OF LABELS, PLACARDS, & MARKINGS INTRODUCTION

Hazardous materials labels, placards, markings, and are indispensable for complying with DOT requirements for transportation of hazardous materials. Safe handling and shipping of hazardous materials relies on the placement of the correct labels, placards, and markings.

- **LABELS** are standardized hazardous materials identifiers, placed on packages, packaging, and overpacking, complying with DOT specifications.
- **PLACARDS** are placed on outer containers, cylinders, trucks, or other vehicles used to transport hazardous materials.
- **MARKINGS** are additional identification other than labels and placards that provide more information on the material and the danger it represents.

These are standardized and designed to meet the specifications of the DOT.

HAZARD MATERIALS WARNING LABELS

CLASS 1	CLASS 2	CLASS 4	CLASS 6	CLASS 7	CLASS 8
<p>EXPLOSIVE Division 1.1, 1.2, 1.3  \$172.411</p> <p>* Include division number and compatibility group letter.</p>	<p>FLAMMABLE GAS Division 2.1  \$172.417</p>	<p>FLAMMABLE SOLID Division 4.1  \$172.420</p>	<p>POISON INHALATION HAZARD Division 6.1  \$172.439 <i>Inhalation Hazard</i></p>	<p>RADIOACTIVE I  \$172.436</p>	<p>CORROSIVE  \$172.442</p>
<p>EXPLOSIVE Division 1.4  \$172.411</p> <p>* Include compatibility group letter.</p>	<p>NON-FLAMMABLE GAS Division 2.2  \$172.416</p>	<p>SPONTANEOUSLY COMBUSTIBLE Division 4.2  \$172.422</p>	<p>POISON Division 6.1  \$172.439 <i>Other Than Inhalation Hazard</i></p>	<p>RADIOACTIVE II  \$172.436</p>	<p>CLASS 9 MISCELLANEOUS  \$172.436</p>
<p>EXPLOSIVE Division 1.5  \$172.406</p> <p>* Include compatibility group letter.</p>	<p>OXYGEN Division 2.2  \$172.405(0)</p>	<p>DANGEROUS WHEN WET Division 4.3  \$172.423</p>	<p>TOXIC Division 6.1  \$172.439 <i>Other Than Inhalation Hazard</i> "TOXIC" may be used instead of "POISON".</p>	<p>RADIOACTIVE III  \$172.440</p>	<p>LITHIUM BATTERY  \$172.450</p>
<p>EXPLOSIVE Division 1.6  \$172.411</p> <p>* Include compatibility group letter.</p>	<p>POISON GAS Division 2.3  \$172.416</p>	<p>CLASS 5 OXIDIZER Division 5.1  \$172.428</p>	<p>PACKING GROUP III Division 6.1  \$172.405(0) <i>Other Than Inhalation Hazard</i> "PG III" may be used instead of "POISON."</p>	<p>FISSILE  \$172.441</p>	<p>EMPTY LABEL  \$172.450</p>
<p>SUBSIDIARY RISK LEVEL  \$172.411 <small>Division number/compatibility group letter can be displayed.</small></p>	<p>CLASS 3 FLAMMABLE LIQUID  \$172.409</p>	<p>ORGANIC PEROXIDE Division 5.2  \$172.427</p>	<p>INFECTIOUS SUBSTANCE Division 6.2  \$172.432</p>	<p>CARGO AIRCRAFT ONLY</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  \$172.448 Cargo Aircraft Only </div> <div style="text-align: center;">  \$172.448 Magnetized Material </div> </div>	

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Appendix G

Acronym and Abbreviation

Agency Safety Officers (ASO)
CIL Chemical Inventory List (CIL)
Federal On-Scene Coordinator (FOOSC)
General Service Administration (GSA)
Hazard Communication Program (HCP)
Hazard Communication Standard (HCS)
Hazardous Material Handler (HMH)
Hazardous Material Specialist (HMS)
Hazardous Waste Operations and Emergency Response (HAZWOPER)
High-Efficiency Particulate Air (HEPA)
Immediately Dangerous to Life and Health (IDLH)
Incident Commander (IC)
Liquid Petroleum Gas (LPG)
Maintenance Software (MAXIMO)
Material Safety Data Sheet (MSDS)
National Fire Protection Association (NFPA)
National Fire Protection Association (NFPA)
Navajo Nation Environmental Protection Agency (NNEPA),
Navajo Nation Office of Safety and Health Administration (NNOSHA)
Navajo Region Branch of Environmental Services (NRBES),
Office of Indian Education Program (OIEP)
Personal Protection Equipment (PPE)
Regional Fire Marshall (RFM)
Regional Safety Officer (RSO)
Resource Conservation and Recovery Act (RCRA)
Self-Contained Breathing Apparatus (SCBA)
Spill Prevention Control and Countermeasures (SPCC)
Standard Operation Procedures (SOP)
U.S. Office of Safety and Health Administration OSHA
United States Environmental Protection Agency (USEPA)