



This document is one section from EPA's "Chemical Management Resource Guide for School Administrators," published in December 2006. The reference number is EPA-747-R-06-002. You can find the entire document at <http://www.epa.gov/opptintr/chemmgmt/index.htm>.

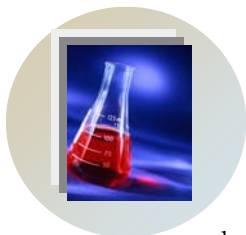
Chemical Management Resource Guide for School Administrators

Summary

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“...No one was sure what chemicals were involved in the fire [in the facilities maintenance warehouse at the school]. Pallets of bleach, ammonia and sulfuric acid based drain cleaner had been stored adjacent to each other, and rupturing of the chemicals during the fire created an acid vapor cloud as well as chlorine and phosgene gases. The total cost of this event was about half a million dollars.”

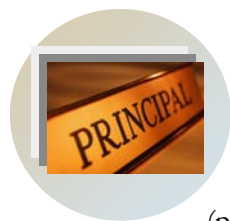
– From a case study of a suburban public high school in New England¹



Are there Dangerous Chemicals in Your School?

The sources of dangerous chemicals in schools are not always obvious. This guidance applies to any school that **purchases, uses, stores, or disposes** of chemicals or products containing dangerous materials. Some of the most common dangerous chemical products in schools include:

- Laboratory chemicals (e.g., acids, bases, solvents, metals, salts)
- Industrial arts or “shop” classes (e.g., inks, degreasers)
- Art supplies (e.g., paints, photographic chemicals)
- Pesticides, fertilizers, and de-icers
- Maintenance supplies and equipment (e.g., drain cleaners, floor stripping products, paints, oils, boiler cleaners, fuels, mercury switches and gauges)
- Health care equipment (e.g., mercury thermometers).



Who Should Read This Guidance?

This document is designed primarily for school administrators (principals and other policymakers), but may also be of value for teachers, maintenance personnel, superintendents, school business officials, insurance industry risk managers, and parents.

What Can Schools Do to Prevent Spills and Costly Incidents of Dangerous Chemicals?



- Establish a leadership team consisting of qualified and experienced individuals to oversee chemical management activities and confirm the availability of budget and resources (**Section III.A**)
- Implement pollution prevention and green chemistry (safer alternatives) principles, whenever possible, to minimize the use of hazardous chemicals at schools (**Section III.B**)
- Establish a chemical management policy and chemical hygiene plan (**Section III.C**)
- Conduct periodic chemical inventories to identify hazards (**Section III.D**)
- Establish an environmentally preferable purchasing policy (**Section III.E**)
- Implement an appropriate chemical storage and handling policy (**Section III.F**)
- Establish a training program for hazardous chemicals management and safety (**Section III.G**)
- Develop a hazard communication plan to foster awareness among school personnel and students about the range of chemicals and products used in schools (**Section III.H**)
- Create an emergency response and spill clean-up plan and ensure that all chemicals are disposed of in accordance with federal, state, and local regulations (**Section III.I**)

Where Can I Get Additional Help?

Each EPA Regional Office shares common chemical management goals; each region has its own contact point to best serve schools in their respective states. For more information on EPA programs for schools, such as EPA's Schools Chemical Cleanout Campaign (SC3), legal requirements that schools may face, and where your school can receive additional help, refer to the following regional contact information and websites in the box below.

Local government entities that may be able to help your school understand and address chemical management issues (e.g., treatment and disposal options) include Local Emergency Planning Committees (LEPCs), local health departments, state environmental departments, and fire departments. For more information about how local organizations can help, visit EPA's SC3 - Businesses and Community Organizations website at <http://www.epa.gov/sc3/>.



Check It Out

EPA Resources for Additional Information

- EPA, Healthy School Environments, <http://www.epa.gov/schools/>
- EPA's Schools Chemical Cleanout Campaign (SC3), <http://www.epa.gov/sc3/>
- EPA, Where You Live, <http://www.epa.gov/epahome/whereyoulive.htm>

What Legal Requirements Do I Have?

Some chemicals purchased by schools may need to be managed as hazardous wastes and may ultimately require disposal as such. Hazardous wastes need to be managed from their initial point of generation until their ultimate point of disposal, known as "cradle to grave." The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control the generation, transportation, treatment, storage, and disposal of hazardous waste. Any school that generates hazardous wastes must notify their state environmental agency and obtain an EPA Identification (ID) Number. This EPA ID Number must be put on all manifests for tracking disposal of school wastes and must be site specific for the address given. School liability does not end when the wastes leave the school, and school administrators must make sure they receive a copy of the shipping manifest stating that their wastes arrived at their destination (e.g., treatment, storage, or disposal facility). Laws and regulations pertaining to RCRA are available at <http://www.epa.gov/epaoswer/osw/laws-reg.htm>.

EPA's Healthy School Environments Assessment Tool (HealthySEAT) provides information to help determine if a school is subject to Federal OSHA requirements at <http://www.epa.gov/schools/healthyseat/frequentquestions.htm>. Although Federal OSHA does not have jurisdiction over state and local government employees, including those in public schools, the 26 states that operate OSHA-approved State Plans are required to extend their state standards to these workers. A list of OSHA State-Plan states is located at <http://www.cdc.gov/niosh/docs/2004-101/appena.html#oshasps>. Each state's programs are unique and may have additional regulations and requirements. In states under Federal OSHA without State Plans, OSHA has no authority to inspect or enforce standards in public schools; however, the local Federal OSHA office may be able to provide hazard recognition assistance and technical support. Compliance assistance information is available on OSHA's website at <http://www.osha.gov>.

The National Institute for Occupational Safety and Health (NIOSH) provides a comprehensive safety checklist program for schools at <http://www.cdc.gov/niosh/docs/2004-101/default.html>, which contains recommendations and detailed checklists on OSHA regulations, along with background information on how to make sense of regulations that may be applicable to schools (<http://www.cdc.gov/niosh/docs/2004-101/chap1.html>).

In addition, EPA may enforce certain OSHA standards, such as Hazardous Waste Operations (29 CFR 1910.120) or relevant EPA standards in public schools. In addition to Federal requirements, states may have their own laws. Legal requirements are often updated and vary from state to state. In many states, the health and safety of public employees, including teachers and other school staff, fall under the jurisdiction of a state agency, such as the state department of labor or commerce.

Note:
This document is intended to serve as guidance only and does not supersede any federal, state, or local laws and regulations.