

FREMONT UNION HIGH SCHOOL DISTRICT

HAZARD COMMUNICATION PROGRAM

2016



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For more information contact the Santa Clara County Schools' Insurance Group www.sccsig.org

HAZARD COMMUNICATION PROGRAM – GLOBALLY HARMONIZED SYSTEM

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For additional handouts and training resources visit OSHA website

<https://www.osha.gov/dsg/HazCom/HCSFactsheet.html>

1. PROGRAM SUMMARY

The Fremont Union High School District is committed to providing a safe and healthy work environment for faculty, staff and students. The Fremont Union High School District Hazard Communication Program (HazCom) has been developed to improve communication and training associated with the use, handling, and storage of hazardous chemical products. The program is designed to increase employee awareness of the hazardous chemical products used in the workplace by providing information about the hazardous chemical products, identifying the associated hazards and harmful effects, and how to protect themselves from the risks of those hazards. This document uses the Globally Harmonized System (GHS) for classification and labeling of chemicals which was incorporated into the 2013 Cal/OSHA Hazard Communication Standard (California Code of Regulation (CCR), Title 8, §5194).

From 2013 through 2016, Fremont Union High School District has been transitioning from the previous standard requirements to the new requirements. By June 1, 2016, The Fremont Union High School District will incorporate all the changes into its HazCom Program. This document serves as the Fremont Union High School District general HazCom Program. In addition, the school sites are required to complete school site specific Chemical Product Inventories and Safety Data Sheets (SDSs). Employees must adhere to the general HazCom Program and their school/department specific requirements. The Hazard Communication Program will identify the following:

- Key personnel responsible for the program.
- Location of chemical inventory list and SDSs.
- Workplace labeling system.
- Good work practices and procedures to minimize exposures.
- How training will be performed.
- Procedures to maintain the program and update the required information.
- How records will be maintained.
- This program does not apply to Chemical Laboratories (T8CCR5191). Employers engaging in the laboratory use of chemicals must develop a written Chemical Hygiene Plan, Standard Operating Procedures and also follow the California Education Code Sections 32060-32066.

2. SCOPE AND APPLICATION

The District shall make the written Hazard Communication Program available, upon request, to employees, their designated representatives, contractors/vendors and authorities. The methods for meeting the requirements of a written HazCom program include:

- List of all hazardous chemical products known to be present in the workplace or individual work area. See Chemical/Product Inventory and sample Safety Data Sheets in Appendices.
- Methods used to inform employees of the hazards of non-routine tasks.
- Methods used to obtain and maintain safety data sheets (SDSs).
- Methods used to provide employees with information and training on hazardous chemical products in their work areas.
- Methods used to provide the employees of other employers (e.g., consultants, construction contractors and temporary employees) on-site access to SDSs for each hazardous chemical that the other employer’s employees may be exposed to while working in the workplace.
- Methods used to inform the employees of other employers of precautionary measures that need to be taken to protect themselves during the workplace’s normal operating conditions and in foreseeable emergencies to include labeling system.

The above criteria is applicable when employees of other employers (contractors) are performing work at any district site.

3. RIGHTS AND RESPONSIBILITIES

3.1 SUPERINTENDENT

The Superintendent has the ultimate responsibility to ensure that the applicable operations of the District are conducted in accordance with these provisions.

Polly Bove	Superintendent	(408) 522-2201
Name	Title	Phone Number

3.2 SAFETY COORDINATOR

The person responsible for administering the HAZARD COMMUNICATION PROGRAM is:

Erik Walukiewicz	Director of Facilities	(408) 522-2256
Name	Title	Phone Number

Responsibilities include:

- 3.2.1 Reviewing the potential hazards and safe use of hazardous chemical products.
- 3.2.2 Maintaining a list of all hazardous chemical products and a master file of Safety Data Sheets.

- 3.2.3 Ensuring that all containers are labeled, tagged or marked properly.
- 3.2.4 Organize and/or provide new-hire and annual training for employees.
- 3.2.5 Maintaining safety training records.
- 3.2.6 Properly selecting and caring for personal protective equipment.
- 3.2.7 Directing the cleanup and disposal operations of any hazardous spills.
- 3.2.8 Identifying hazardous chemical products used in non-routine tasks and assessing their risks
- 3.2.9 Informing outside contractors who are performing work on District property about potential hazards and provide SDSs of any chemical products that they or their employees may encounter.
- 3.2.10 Reviewing the effectiveness of the Hazard Communication Program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements.
- 3.2.11 Responding to regulatory agencies such as Cal/OSHA inspectors.

3.3 PURCHASING AGENT

Ruth Sandoval

Purchasing Agent

(408) 522-2218

Name	Title	Phone Number
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The purchasing agent is responsible for:

- 3.3.1 Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemical products used or stored in the workplace.
- 3.3.2 Provide SDSs to warehouse department, safety coordinator and anyone receiving chemical products.

3.4 WAREHOUSE DEPARTMENT

When the chemicals/products arrive to the sites, the warehouse department responsible for:

- 3.4.1 Reviewing incoming hazardous chemical products to verify correct labeling.
- 3.4.2 Verify that SDS have been provided by the Purchasing Department. Contact the Purchasing Department and request SDS for the products received.
- 3.4.3 Hold the hazardous chemical products in the receiving area properly stored and labeled, to prevent accidental distribution until receipt of the SDSs.

3.5 DEPARTMENT SUPERVISORS AND PRINCIPALS

- 3.5.1 Supervisors and Principals are responsible for implementing HazCom program at the operational level and ensuring the safe use of hazardous chemicals for all areas under their supervision.
- 3.5.2 They must maintain this written program to include the site specific Chemical / Product Inventory and Safety Data Sheets.

Responsibilities include:

- 3.5.3 Completing a Job Safety Analysis and /or a Hazard Assessment per district's Injury and Illness Prevention Program.
- 3.5.4 Assessing the need to request specialized training and / or certification regarding any personal protective equipment such as respirators. For information consult 8 CCR §3380- Personal Protective Devices.
- 3.5.5 Providing training and information to anyone who may be affected by work with hazardous chemicals, including ready access to SDSs and emergency procedures for hazardous chemicals used in the work area. This includes all classified employees, teachers, administration employees, and personnel from other vendors or contractors who may be affected by department operations.
- 3.5.6 Identifying the hazardous chemicals present in the work area.
- 3.5.7 Maintaining an inventory list of hazardous chemicals present in the work area; and
- 3.5.8 All hazardous chemicals are labeled and stored as required by the HazCom, GHS guidelines.

3.6 EMPLOYEES

Employee Rights:

- 3.6.1 To receive information regarding hazardous chemicals to which the employee may be exposed.
- 3.6.2 For the employee's physician or bargaining unit representative to receive information regarding hazardous chemicals to which the employee may be exposed when requested.
- 3.6.3 Access to employee's medical and exposure monitoring records; and
- 3.6.4 To freely exercise "Right to Know" rights without fear of discharge or retaliation.

Employee Responsibilities:

- 3.6.5 Identifying hazards before starting any job.
- 3.6.6 Reading container labels and SDSs.
- 3.6.7 Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers.

- 3.6.8 Using controls and/or personal protective equipment provided by the District to minimize exposure.
- 3.6.9 Following district's HazCom instructions and warnings pertaining to chemical handling and usage.
- 3.6.10 Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement.
- 3.6.11 Knowing and understanding the consequences associated with not following District policy concerning the safe handling and use of chemicals.
- 3.6.12 Participating in training.

3.7 CONTRACTORS, VENDORS AND SUPPLIERS

- 3.7.1 The Safety Coordinator informs outside contractors who are performing work on District property about potential hazards and provide SDSs of any chemical products that they or their employees may encounter.
- 3.7.2 Outside contractors must notify and receive approval of any chemical products to be used at district's facilities.
- 3.7.3 The safety coordinator will advise contractors that they must comply with all Cal/OSHA and OSHA standards while working on district property.

4. NON-ROUTINE TASKS

The safety coordinator and the immediate supervisor of an employee performing a non-routine task, such as cleaning machinery and other equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed.

Special work permits are required for the performance of certain non-routine tasks, such as entry to confined spaces, breaking and opening piping systems, and welding and burning. For some special tasks, employees are required to follow special lock-out/tag-out procedures.

5. CHEMICAL / PRODUCT INVENTORY

The "Chemical Inventory" will be updated upon receipt or removal of hazardous chemical products from the site. Many materials such as cleaning agents, adhesives, copying supplies, art materials, paints, strippers, solders and welding supplies, fertilizers, pesticides, and compressed gases contain

hazardous materials and must be included on the inventory. The list of materials/products for each school site and or shop is included in the Chemical / Product Inventory which should be kept at each site. A compiled list of chemical products are maintained by the Safety Coordinator. See Chemical / Product Inventory sample in appendices.

6. SAFETY DATA SHEETS

- 6.1.1 The objective of a Safety Data Sheet (SDS) is to concisely inform you of the hazards of the materials you work with or may be exposed to so you can protect yourself and respond to emergency situations.
- 6.1.2 Each department or shop will maintain an SDS library on every substance on their list of hazardous chemical products.
- 6.1.3 The Safety Coordinator will secure and maintain an SDS for each hazardous material used in district/school site.
- 6.1.4 SDSs must be readily accessible to employees working in remote or field locations. Appropriate SDSs will be maintained in a binder in each vehicle, on each job site or immediately accessible by phone and fax.
 - 6.1.4.1 Alternatively, SDSs may be accessed electronically (i.e., via computer locally or via Internet). If electronic access is used, the procedure to access those sheets will be attached and employees will be trained in the access procedure.
- 6.1.5 SDSs must be readily available to all employees and Cal/OSHA upon request.
- 6.1.6 SDSs must be received at the facility either prior to, or at the time of receipt of the first shipment of any potentially hazardous chemical purchased from a vendor.
 - 6.1.6.1 If materials are received for which no SDS is available in the area of use, the Safety Coordinator shall secure the needed SDS by contacting chemical supplier/manufacturer.

[FOR MORE INFORMATION SEE APPENDIX "D" SAFETY DATA SHEETS](#)



7. LABELS AND PICTOGRAMS

- 7.1.1 The purpose of the newly adopted hazardous chemical labeling requirement is to bring into alignment with the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS).
- 7.1.2 These changes will ensure improved quality and consistency and will enhance employee understanding of the hazards. In addition to labels, Safety Data Sheets must also be provided to employees.
- 7.1.3 Every container of a hazardous chemical, except containers that will contain chemicals for immediate use, must be labeled, tagged, or marked to identify the substance and appropriate hazard warnings.
- 7.1.4 Labels shall be legible, in English and prominently displayed on the container.
- 7.1.5 Secondary labels, often used in spray bottles, must contain at a minimum the identity of the chemical and its appropriate hazard warning.
- 7.1.6 Manufacturer labels shall provide: Identity of the hazardous substance, signal word, hazard statement(s), pictograms, precautionary statement and name and address of the manufacturer, importer or responsible party. For more information see Appendices.

[FOR MORE INFORMATION SEE APPENDIX "B"](#)



Hazard Communication Standard Labels

OSHA has updated the requirements for labeling of hazardous chemicals under its Hazard Communication Standard (HCS). As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown on the right. Supplemental information can also be provided on the label as needed.

For more information:



(800) 321-OSHA (6742)
www.osha.gov

SAMPLE LABEL

CODE _____ Product Name _____	} Product Identifier	 Hazard Pictograms
Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____	} Supplier Identification	
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.		 Signal Word Danger
In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish. First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.		
Supplemental Information Directions for Use _____ _____ _____ Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____		

OSHA 3490-02 2012

8. TRAINING REQUIREMENTS

8.1 GENERAL AND DEPARTMENT / SITE SPECIFIC

Supervisors and Principals must provide employees information and training regarding the physical and health hazards of the chemicals in the work area before assigning employees to work with hazardous chemicals. Training may include:

- 8.1.1 Signs and symptoms related to the exposures to hazardous chemicals used in the work area.
- 8.1.2 Methods that may be used to detect the presence or release of a hazardous chemical. This could include industrial hygiene monitoring, the use of continuous monitoring devices, visual appearance, or odors of chemicals.
- 8.1.3 Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used.
- 8.1.4 Explanation of the labels received on shipped containers.
- 8.1.5 Explanation of the workplace labeling system.
- 8.1.6 Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.

8.2 FREQUENCY OF TRAINING

- 8.2.1 When employee is first hired or before assigning employees to work with hazardous chemicals.
- 8.2.2 When a new substance or product has been added.
- 8.2.3 Refresher training must be completed at least once every three years.

9. EMERGENCY PROCEDURES

Employees shall follow emergency procedures covered in their department/school site specific Emergency Action Plan and Injury and Illness Prevention Program. Emergency response procedures are also covered in the SDSs, labels, and district's Comprehensive School Safety Plan.

School District must identify those operations that may

[Emergency Contact Poster – See Appendix](#)

A poster with emergency contacts must be posted in areas where chemical products are mixed, stored and may have potential for spills.

Eye Wash Stations

The American National Standards Institute (ANSI) Z358.1-2009 standard is used to help plant managers and safety professionals comply with the Occupational Safety and Health Administration (OSHA) regulations requiring employers to provide a safe workplace. This ANSI Standard establishes the universal minimum performance required for all eyewash and drench shower equipment used in plants. It states that all flushing equipment must be located in easy-to-reach areas, with the eyewash station or shower accessible within 10-seconds. This has become referred to as the 10 second rule. Additionally, eye wash stations and showers must be installed in well-lit and marked areas with a minimum flow rate of .4 GPM at 30PSI and 20 GPM at 30PSI respectively.

10. RECORDKEEPING

Records pertaining to the HazCom/GHS program will be maintained by the safety coordinator. The safety coordinator will keep the following records:

- Chemical / Product inventory list by department / school site.
- Copies of phone call logs and letters requesting SDSs; these records may be requested by Cal/OSHA inspectors.
- Employee training records.
- Warnings issued to employees for not following the HazCom / GHS program.
- A written copy of district's HazCom / GHS program including the Chemical / Product Inventory must be updated as needed and readily available.

11. PROGRAM REVIEW

The Safety Coordinator will conduct a periodic program review at least once every three years.

12. DEFINITIONS

Article	A manufactured item (1) which is formed to a specific shape or design during manufacture; (2) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (3) which does not release, or otherwise result in exposure to a hazardous substance under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations.
Classification	To identify the relevant data regarding the hazards of a chemical; review those data to ascertain hazards associated with the chemical; and decide whether the chemical will be classified as hazardous, and the degree of hazard where appropriate, by comparing the data with the criteria for health and physical hazards. Typical classifications might be flammable, corrosive, reactive and toxic.
Hazardous chemical	Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiate, combustible dust, pyrophoric gas, a hazard not otherwise classified or is included in the <i>Director's List of Hazardous Substances</i> (www.sccsig.org).
Health hazard	A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with the established scientific principles that acute or chronic health effects may occur in exposed employees. Health Hazard Criteria can be found in 29 CFR § 1910.1200 – Appendix A (8 CCR § 5194 Appendix A references this federal regulation). Hazards are listed as “H” codes on GHS-compliant labels and Safety Data Sheets (SDSs).
Label	An appropriate group of written, printed, graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical or to the outside packaging.
Near miss	As defined by OSHA, refers to incidents where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or personal injury easily could have occurred.
Physical hazard	A chemical that is classified as posing one of the following hazardous effects: explosive, flammable (gases, aerosols, liquids or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; combustible liquid; water reactive; or in contact with water emits flammable gas. Physical criteria can be found in 29 CFR 29 CFR § 1910.1200 – T8 CCR § 5194 Appendix B references this federal regulation.
Pictogram	A composition that may include a symbol plus other graphic elements, such as a border, background pattern or color that is intended to convey specific information about the hazards of a chemical.
Precautionary statement	A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to hazardous chemicals, or improper storage or handling. Statements are listed as “P” codes on GHS-compliant labels and SDSs.
Pyrophoric gas	A chemical that will ignite spontaneously in air at the temperature of 130° F (54.4 degrees C) or below.
Safety Data Sheet (SDS)	Written or printed material concerning a hazardous chemical that is prepared in accordance with 8 CCR § 5194(g). (See Appendix “C” for details)
Signal word	A word used to indicate the relative level of severity of hazard and alert the

	reader to a potential hazard on the label. The signal words used are “danger” and “warning”. “Danger” is used for the more severe hazards, while “warning” is used for the less severe.
Simple asphyxiant	A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those individuals who are exposed, leading to unconsciousness and death.
Trade secret	Any confidential formula, pattern, process, device, information, or compilation of information that gives its user an opportunity to obtain a business advantage over competitors who do not know or use it. A trade secret shall not include chemical identify information which is readily discoverable through qualitative analysis.
Use	To package, handle, react or transfer
Workplace label	“Non-original manufacturer label” – label placed on a secondary (workplace) container. When hazardous material is removed/transferred from the original manufacture labeled container to another container (secondary workplace container), the secondary workplace container must have a workplace label with the exception of portable containers that will contain chemicals for immediate use.

13. APPENDICES

[A. Chemical Product Inventory \(Must add Safety Data Sheets\)](#)

[B. Labels and Pictograms Fact Sheet](#)

[C. Safety Data Sheet Fact Sheet](#)

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