HAZCOM 2016

HAZARD COMMUNICATION PROGRAM

San Mateo Union High School District

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HAZARD COMMUNICATION PROGRAM

INTRODUCTION

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 Code of Federal Regulations (CFR) 1910.1200 (General Industry) and 29 CFR 1926.59 (Construction Industry) call for the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. The HCS applies to all organizations, employers and employees covered by OSHA regulations.

PURPOSE

The purpose of this written Hazard Communication Program (HCP) is to establish guidelines and policies to ensure that all members of the San Mateo Union High School District (SMUHSD) are aware and informed of the chemical hazards to which they may be exposed and to provide a foundation of knowledge to allow employees to make informed decisions about these materials. Safe conduct of work, with potentially hazardous chemicals, is dependent upon the value any institution places on protecting health and the environment, and on the motivation and good judgment the individual chemical user exercises. It is the intent of the HCP to reduce risk by establishing procedures and guidelines. It is the responsibility of the Superintendent, Site/ Department Administrators, Supervisors, and staff to adhere to the specifications herein.

The provisions of the HCP apply to any hazardous substance known to be present in the workplace, with the exception of specific research and teaching activities taking place in laboratories. The hazard communication regulation emphasizes workplace safety and requires employers to inform their employees of the hazardous substances to which they could be exposed to on the job. Requirements for developing, implementing, and maintaining a hazard communication program are found in Title 8 of the California Code of Regulations (T8 CCR), Section 5194. Subsection 5194(b)(6) contains the Safe Drinking Water and Toxic Enforcement Act (Proposition 65), which was added to the original hazard communication regulation in 1991.

In 2012, OSHA revised the HCS to align with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012.

The written hazard communication program will include and address the following criteria in order to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area
- Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
- Methods used to obtain and maintain safety data sheets (SDSs)

- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of non-routine work practices
- 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
- Methods used to inform the employees of other employers of the labeling system used in the workplace

The program must include labels on containers of hazardous chemicals, SDSs for hazardous chemicals, and training for workers. Each employer must also describe in a written program how it will meet the requirements of the HCS in each of these areas.

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

RESPONSIBILITIES

Employers must ensure that the SDSs are readily accessible to employees for all hazardous chemicals in their workplace. This may be done in many ways. For example, employers may keep the SDSs in a binder or on computers as long as the employees have immediate access to the information without leaving their work area when needed and a back-up is available for rapid access to the SDS in the case of a power outage or other emergency. Furthermore, employers may want to designate a person(s) responsible for obtaining and maintaining the SDSs. If the employer does not have an SDS, the employer or designated person(s) should contact the manufacturer to obtain one.

The SMUHSD Environmental Health and Safety Specialist, is responsible for administering the hazard communication program.

This person is also responsible for:

- Reviewing the potential hazards and safe use of chemicals
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Ensuring that all containers are labeled, tagged or marked properly
- Providing new-hire and annual training for employees
- Maintaining training records
- Properly selecting personal protective equipment

- Identifying hazardous chemicals used in non-routine tasks and assessing their risks
- 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
- Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace

All SMUHSD employees are responsible for the following aspects of the hazard communication program:

- Identifying hazards before starting a job
- Reading container labels and knowledgeable of where to find the SDS binders
- Knowledgeable of how to read an SDS to obtain information on chemical properties or what to do in case of an emergency
- Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers
- Using controls and/or personal protective equipment provided by the company to minimize exposure
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
- Participating in annual training

CHEMICAL INVENTORY LIST

Attached to this program in Appendix A is a list of hazardous chemicals used, produced and/or stored at each facility. Copies of the chemical inventory list are available on Google Docs in the SMUHSD Chemical Inventory Folder and will be maintained by the Environmental Health and Safety Specialist.

This list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical is used, and the personal protective equipment and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced to the workplace.

PROPOSITION 65 LIST OF CHEMICALS

The Environmental Health and Safety Specialist is responsible for obtaining updates of Proposition 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Proposition 65 list, warning requirements take effect 12 months from the date of listing. The update can be obtained by checking the California OSHA (Cal-OSHA) website annually in order to find the latest version. If there are any Prop.65 chemicals used on the site, a notice needs to be posted at the place of usage, or prior exposing anyone to the chemical. In lieu of posting signs at each place of usage and notify each employee in the area, one sign can be posted at the entrance of the school site.

GLOBALLY HARMONIZING SYSTEMS (GHS)

Federal OSHA Hazard Communication Standard was revised in 2012 to align with the United Nations' GHS of Classification and Labeling of Chemicals. The revised standard will be fully implemented in 2016. Cal-OSHA adopted this Federal Standard in May 2013.

The notable changes to the Federal Hazard Communication Standard are:

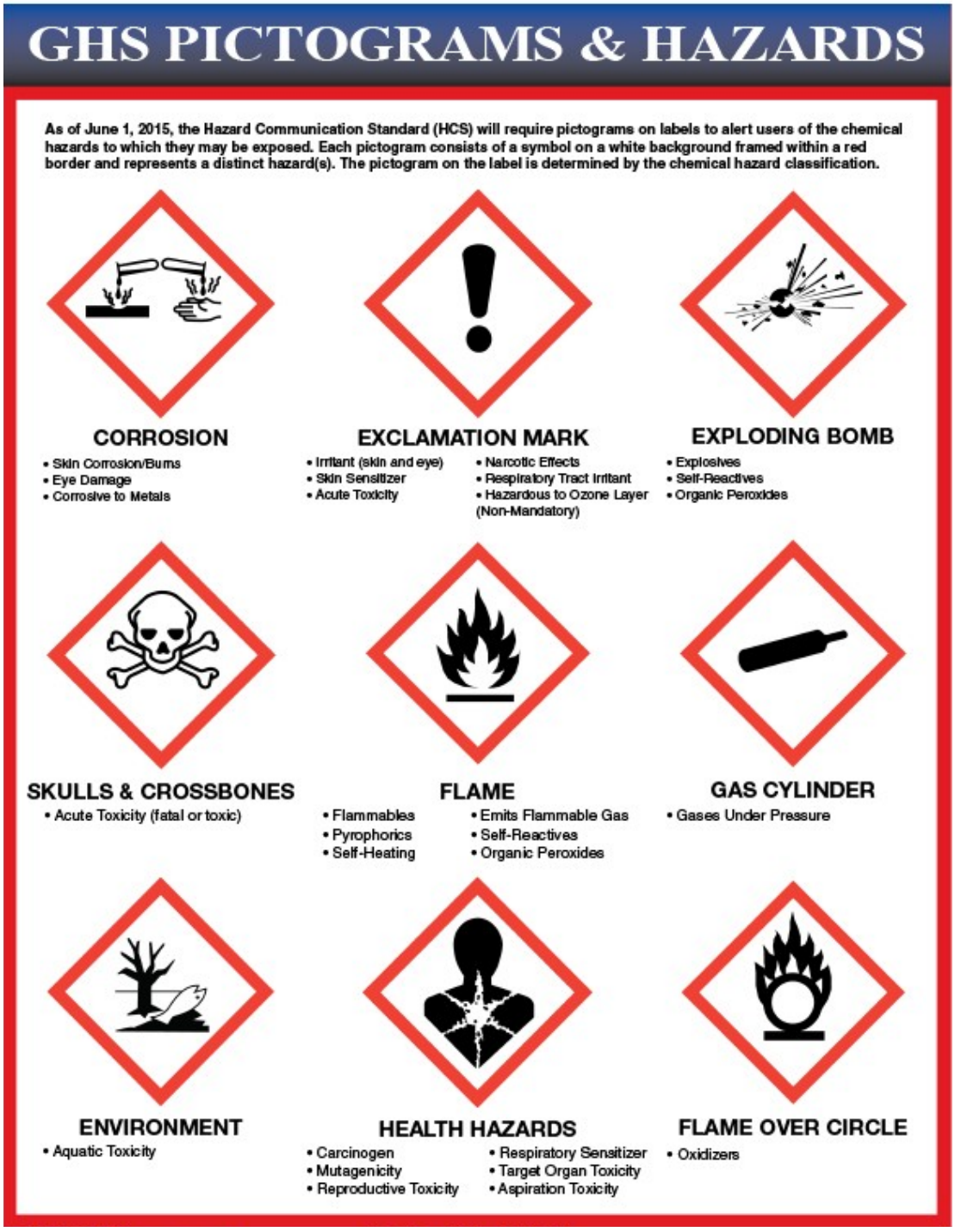
• **Hazard classification**: Provides specific criteria for classification of health and physical hazards, as well as classification of mixtures.

• **Labels**: Chemical manufacturers and importers will be required to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided.

• **Safety Data Sheets:** Will now have a specified 16-section format. The new sections are highlighted in yellow below.

• **Information and training:** Employers are required to train workers by December 1, 2013 on the new labels elements and safety data sheets (SDS) format to facilitate recognition and understanding.

Examples of pictograms for labels are:



• **GHS Effective Dates:**

The table below summarizes the phase-in dates required under the revised HCS.

Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 1, 2015	Compliance with all modified provisions of this final rule, except: The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Chemical manufacturers, importers, distributors and employers
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers

Additional information on the GHS of Classification and Labeling of Chemicals can be found at the links listed below:

1. Hazard Communication Standard – Pictogram Quick Card,
http://www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html

2. Hazard Communication Standard – Safety Data Sheet (SDS) Quick Card,
http://www.osha.gov/Publications/HazComm_QuickCard_SafetyData.html

3. Hazard Communication Standard – Safety Data Sheet (SDS) Brief,
http://www.osha.gov/Publications/OSHA3514.html

LABELS AND OTHER FORMS OF WARNING

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

SMUHSD will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

- Product identifier
- Signal word

- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer, do not require a label. If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.

Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow.

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

• **Manufacturer's Label:**
The primary label is attached to the chemical container by the manufacturer. Only authorized personnel are permitted to accept deliveries of chemicals. The chemical receiver shall be responsible for checking that all the incoming chemicals are properly labeled with primary labels. Each primary label must be in good condition and marked with the following information:
- Chemical, common, or trade name.
- Hazard warning statement (Flammable, Corrosive, etc.).
- Name and address of the chemical manufacturer, importer, or distributor.

This applies to all chemicals from outside suppliers, including vendor trial substances.

• **Right-to-Know Label (secondary in-house container):**
Each container used in the work area must be labeled. When chemicals are transferred from the manufacturer's original chemical container into a secondary in-house container, the secondary in-house container must also be labeled with the common or trade name of the hazardous material and a hazard warning statement and / or the hazardous properties.
To address exposures to Proposition 65 chemicals, the Environmental Health and Safety Specialist will provide clear and reasonable warnings to individuals prior to exposure by means of posting signs conspicuously, labeling consumer products, and training employees. If applicable, the Environmental Health and Safety Specialist will arrange for labels, signs, and other warnings to be printed in other languages (as requested).

• **Universal Waste Labels:**
All universal waste storage containers must be labeled with the item type, location and the first day that the waste accumulation began. All light bulb variations and nickel cadmium batteries

have universal waste stations located at each school site. Disposition of the universal waste is coordinated through the respective Facility Manager. Lithium ion batteries are not included within this waste stream and can be exchanged with the vendor.

• **Hazardous Waste Labels:**
All hazardous waste storage containers must be labeled with a satellite hazardous waste accumulation label. The label must be filled out the first day waste is accumulated within the container or waste bag. A yellow hazardous waste label is completed and attached to the designated hazardous waste containers at the accumulation or the chemical storage area. All labels must be legible, in English, and prominently displayed. The label should be placed on one of the sides of the container and not on the lid.

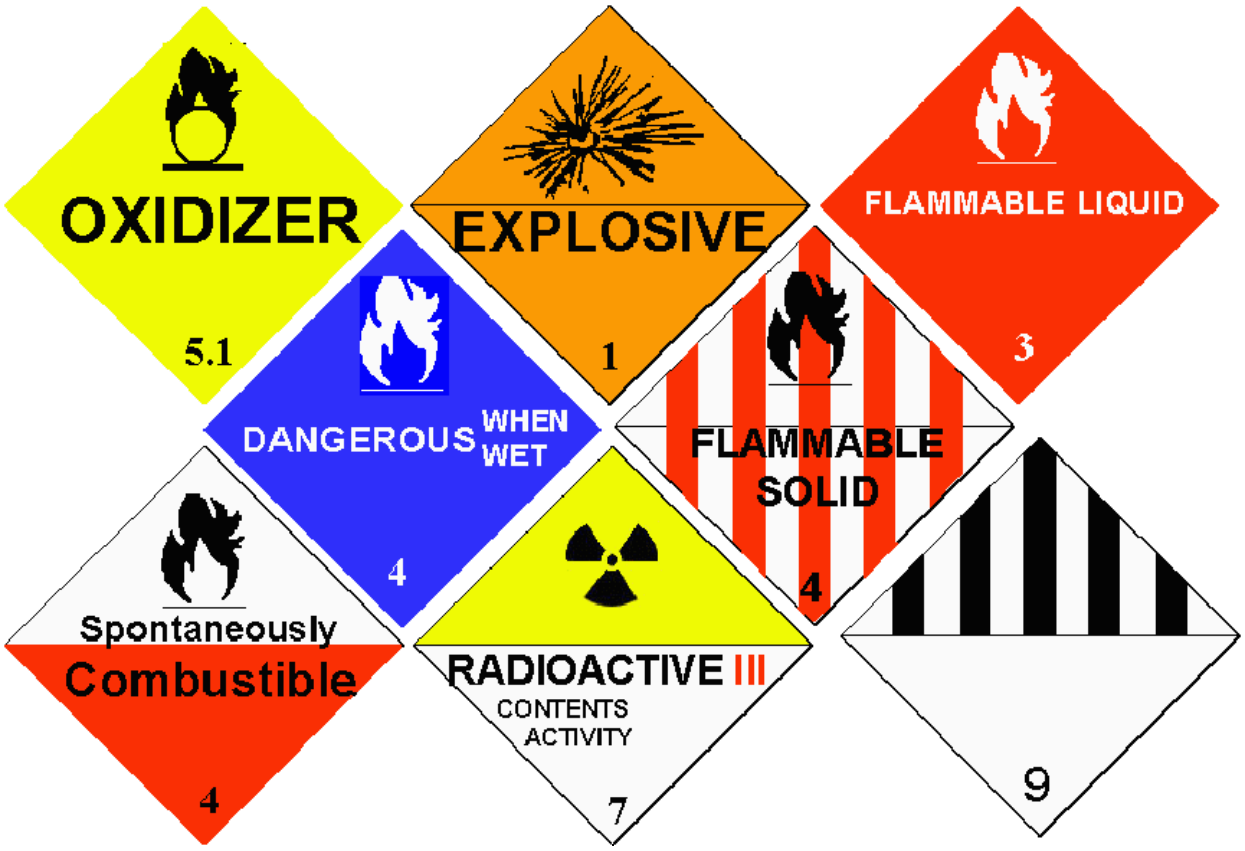
Each label must contain the contents (without using abbreviations), the name of the school or facility, the address, the phone number, the accumulation start date, and the hazardous properties of the waste. The most common hazardous properties include flammable, corrosive, toxic, reactive, and oxidizer.

An example of a California Hazardous Waste Label:

• **Department of Transportation (DOT) Labels:**

DOT labels are found on the outside of hazardous materials containers shipped to the schools. This label is not needed for storage of the hazardous material containers, but will be needed for all hazardous waste containers shipped off site for waste disposal. Before transporting or offering for transport hazardous materials, the School District's staff or contractor must label each package in accordance with the applicable DOT regulation on hazardous materials under Title 49 CFR, or if transporting by air craft, under applicable International Air Transportation Association (IATA) rules, before moving off site. Note that more than one DOT label may be required for certain hazardous materials.

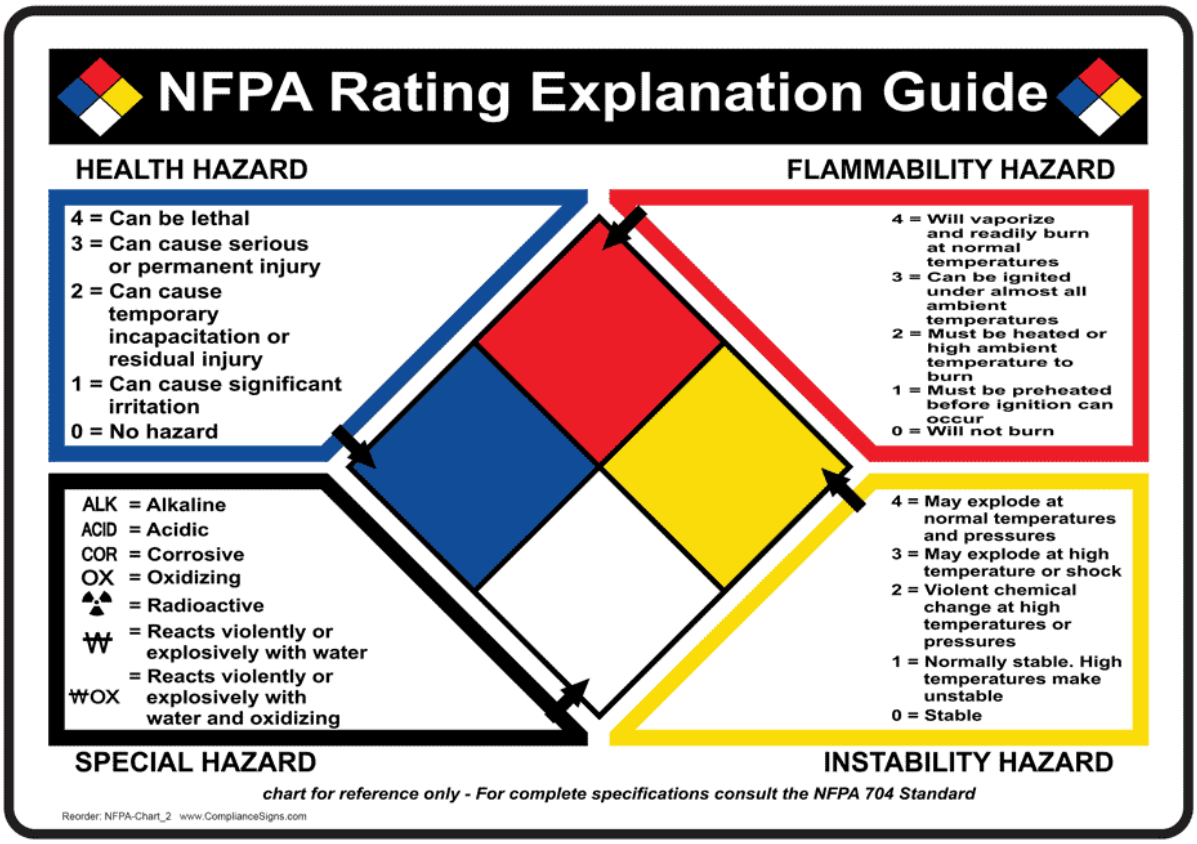
These are examples of DOT Hazmat labels:



• **National Fire Protection Association (NFPA 704) Diamond:**
The marking system, commonly found as signs, is intended to provide basic information to emergency personnel, so that they can better evaluate what firefighting techniques to employ. The diamond shaped sign or label contains four colored categories of hazards: health is blue, flammability is red, reactivity is yellow, and special hazard is white.

NFPA labels can be found on buildings and vehicles on each at each school site in the SMUHSD. Most often these labels are posted to indicate the presence of compressed gases or laboratory chemicals.

A NFPA label explanation guide:



• **Safety Data Sheets:**
An SDS will be obtained and maintained for each hazardous chemical in the workplace. SDSs for each hazardous chemical will be readily accessible during each work shift to employees when they are in their work areas.

SDSs will be obtained from the chemical manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. SDSs for chemicals or process streams produced by the company will be developed and provided by the Environmental Health and Safety Specialist.

The Environmental Health and Safety Specialist will maintain the master file of all original SDSs. Hard copies of the master file will be located in the Maintenance, Operation and Facility Use office and at each work station, laboratory and custodial closet throughout the District.

SDSs for new products or updated SDSs for existing products will be obtained by the purchasing agent and forwarded to the Environmental Health and Safety Specialist. The Environmental Health and Safety Specialist will then update the master file with new and/or updated SDSs.

EMPLOYEE INFORMATION AND TRAINING

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
- Operations in the work area where hazardous chemicals are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released
- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
- 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
- Explanation of the labels received on shipped containers
- Explanation of the workplace labeling system
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information

NON-ROUTINE TASKS

The Environmental Health and Safety Specialist and the immediate supervisor of an employee performing a non-routine task, such as using new cleaning supplies or specialty science studies with students, 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. Science teachers can contact the Environmental Health and Safety Specialist to set up a time to review the “Guidelines for Biosafety in Teaching Laboratories” plan and get signatures from the student’s parents and the school’s administration.

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 lockout/tagout procedures to ensure that all machinery motion has stopped and energy sources are isolated prior to and during the performance of such tasks. The Environmental Health and Safety Specialist needs to be notified when confined space entries are required by on-site employees or private contractors.

CONTRACTORS

Prior to beginning work, the Environmental Health and Safety Specialist will inform contractors with employees working on SMUHSD property of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. The Environmental Health and Safety Specialist will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the Environmental Health and Safety Specialist will advise contractors that they must comply with all OSHA standards while working on SMUHSD property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

The Environmental Health and Safety Specialist will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

RECORDKEEPING

Records pertaining to the hazard communication program will be maintained by the Environmental Health and Safety Specialist. The Environmental Health and Safety Specialist will keep the following records:

- Chemical inventory list
- Hazardous material reviews
- Employee training requirements
- Employee training records

SIGNATORY PAGE

If anyone has questions about this Hazard Communication Plan, please contact the Director of Maintenance, Operations and Facilities Use at 650-558-2411 or lcarlton@smuhsd.org. This plan will be maintained by the Environmental Health and Safety Specialist to ensure that the policies are carried out and the plan is effective. This plan will be reviewed annually for updates and /or changes.

Kevin Skelly, Superintendent of SMUHSD

Date

Linda Carlton, Director of Maintenance,
Operations and Facilities Use

Date

Robin Clemens,
Environmental Health & Safety Specialist

Date

APPENDIX A

For the purpose of this program the Lists of Chemicals used at the District are located on SMUHSD Google Docs in the SMUHSD HazCom Chemical Inventories. These lists will not include the chemicals listed in the science departments. School laboratory chemical lists will be included with the Chemical Hygiene Plan.

https://docs.google.com/a/smuhsd.org/document/d/1zkragIlfdWN2cHf1VEFk0JmpXKY5gihQfBcepHdpt6E/edit?usp=sharing