



# HAZCOM 2026

## HAZARD COMMUNICATION PROGRAM

**San Mateo Union High School District**

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## California's School Employees



### **Federal and State Regulatory Agencies Promoting Safe and Healthy Workplaces for**



### **School Action for Safety and Health (SASH) Program**



The Commission on Health and Safety and Workers' Compensation (CHSWC)

California Department of Industrial Relations



### **How the SASH Program Helps Schools**

The School Action for Safety and Health (SASH) Program is a statewide initiative to help school districts reduce the high rate of work-related injuries and illnesses among school employees.



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## **FOREWARD**

A Hazard Communication Program supports compliance with the Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1200 “Hazard Communication Standard,” commonly referred to as HazCom or the “Right-to-Know” law. It establishes the framework for informing and protecting employees from chemical hazards through proper labeling, Safety Data Sheets (SDS), employee training, and clearly defined communication practices for handling chemicals used in the workplace.

In California, a HazCom is an essential component in maintaining safe learning and working environments for all employees who use, handle, or may be exposed to hazardous chemicals on school campuses. As part of the San Mateo Union High School District (SMUHSD) and as educators, we hold the responsibility not only to teach and inspire students, but also to ensure that every school site upholds the highest standards of safety to protect our employees. An effective HazCom Program is fundamental to protecting the students and employees from the health and safety hazards from hazardous chemicals. It is a legal requirement that employers maintain a current Hazard Communication Program that is reviewed and updated at least once every 12 months.

The HazCom is a critical tool for creating and sustaining a culture of safety throughout the school community. It is designed to ensure that employees, students, and faculty are protected from chemical hazards through clear, consistent communication. The program outlines policies and procedures for chemical labeling, SDS management, employee training, chemical inventory requirements, and safe handling practices. When implemented effectively, these procedures minimize potential risks and ensure that everyone who may be exposed to chemicals has the knowledge, resources, and protective equipment necessary to do so safely. These processes, combined with proper storage, hazard identification, emergency procedures, and ongoing training, form the foundation of a safe and responsible school environment.



## **SECTION 1 - INTRODUCTION**

### **I. Hazard Communication Standard**

The Hazard Communication Standard (Title 8, California Code of Regulations, Section 5194) requires California employers who use hazardous substances to develop, implement, and maintain a comprehensive Hazard Communication Program.

The Federal OSHA Hazard Communication Standard was revised in 2012 to align with the United Nations' GHS of classification and Labeling of Chemicals. Cal/OSHA adopted this Federal Standard in May 2013. The revised standard was fully implemented in 2016. However, revisions to the HCS have been made to align with other domestic agencies and international trading partners, including Canada and the EU. As a result, this program has been revised to comply with the requirements of the OSHA HCS 2024. Updates include terminology clarification and reclassification of hazardous materials that are reflected in this Hazard Communication Program Plan.

This Hazard Communication Program (HazCom) aligns and supports the requirements of the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA), including Title 29 of the Code of Federal Regulations §1200; California Proposition 65 (Title 22 §12000); and applicable sections of the California Code of Regulations, Title 8 (§§337–340.2, §3203, §3204(e), and §5194), as enforced by the California Division of Occupational Safety and Health (DOSH) and the Department of Industrial Relations (Cal/OSHA).

### **II. Purpose**

The purpose of the Hazard Communication Program is to establish guidelines and policies to ensure that all members of the San Mateo Union High School District (SMUHSD) are informed of the chemical hazards and risks that they may be exposed to. It is designed to protect the health and safety of all district employees who might be exposed to hazardous materials under 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).

This HazCom serves as essential knowledge to allow employees to make informed decisions about these materials. The safety of the work environment is dependent on the value an institution places on protecting the health and environment for the staff, especially with hazardous chemicals. The HazCom focuses on reducing risk by establishing procedures, guidelines, and training to influence the motivation and good judgement of the individuals in the San Mateo Union High School District and its chemical users.

### **III. Scope**

The Hazard Communication Standard (Title 8, California Code of Regulations, Section 5194) requires employers in California using hazardous substances to establish, implement and maintain a Hazard Communication Program to ensure the following:

- All hazardous substances, containers, pipes, and holding tanks used in the workplace are properly labeled, tagged, or marked properly.

- Safety Data Sheets (SDSs) are readily available for all hazardous substances used or stored in a work area.
- Provide the employees of other employers (ie. 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.
- Documented Job Hazard and Personal Protective Equipment (PPE) Assessments are conducted for all job tasks using hazardous materials or requiring personal protective equipment.
- Employees who use or are exposed to hazardous substances understand how to recognize and interpret labels and SDS information.
- Educate employees on how to take appropriate precautionary measures to protect themselves from exposure to hazardous substances during normal workplaces operating conditions and foreseeable emergencies.

The provisions of the HazCom apply to any hazardous substance known to be present in the workplace, with the exception of specific research and teaching activities taking place in classroom laboratories. It is the responsibility of the Superintendent, Site/ Department Administrators, Supervisors, and staff to adhere to the specifications herein.

#### **IV. Responsibilities**

Accessibility to SDSs and Hazard Communication must be available to all employees and respective authority at all times for all hazardous chemicals in the workplace. Employers may keep SDSs in a binder and/ 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.

##### **A. Environmental Health & Safety Specialist**

The SMUHSD Environmental Health & Safety Specialist is responsible for administering the hazard communication program as well as the following:

- Reviewing and assessing the potential hazards and safe use of chemicals
- Ensuring that all containers are labeled, tagged, or marked properly
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Providing annual training and training records for the Maintenance, Operations, and Facilities Use Staff.
- Properly selecting and issuing personal protective equipment
- Identifying hazardous chemicals used in non-routine tasks and assessing their risks
- Contacting chemical manufacturers or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace
- Reviewing the effectiveness of the hazard communication program and ensuring the program satisfies the requirements of all applicable federal, state, or local hazard communication requirements.

##### **B. Employees**

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

- Identifying safety risks and hazards before starting a job.
- Knowing where to find SDSs binders and reading container labels.

- Understanding and reviewing SDSs to obtain information on chemical properties and emergency response measures in case of an emergency.
- Notifying the supervisor of torn, damaged, or illegible labels and unlabeled containers
- Participating in annual training.
- Using controls or personal protective equipment provided by the district to minimize exposure.
- Properly caring for personal protective equipment, including proper use, routine care, cleaning, storage, and replacement.
- Knowing and understanding the consequences associated with not following District policy concerning the safe handling and use of chemicals.

**C. Human Resources**

The SMUHSD Human Resources Department are responsible for:

- Providing the necessary resources to ensure the health and safety of their employees;
- Providing new-hire and annual training for employees in the SMUHSD.
- Identifying individuals as supervisors and ensuring they are trained on their health and safety responsibilities.
- Ensuring departmental compliance with district health and safety policies and procedures.
- Collaborating with the Environmental Health & Safety Specialist to review the effectiveness of the hazard communication program and improve the health & safety of the workplace
- Maintain records pertaining to medical surveillance, incident reports, workplace accidents, and worker's compensation
- Human resources should maintain all documentation in regards to the health records of its employees in the district.



## SECTION 2 - CHEMICAL IDENTIFICATION

### I. Chemical Identification

#### A. Globally Harmonized System (GHS)

SMUHSD staff use the Globally Harmonized System for hazardous chemicals and its secondary containers. GHS labeling is a standardized system for communicating chemical hazards through labels that include six key elements.

Labels for a hazardous chemical must contain:

- Name, Address and Telephone Number of the Manufacturer
- Product Identifier
- Signal Word
- Hazard Statement(s)
- Precautionary Statement(s)
- Pictogram(s)

### The Basic Parts of A GHS-Compliant Label

**1** → **n-Propyl Alcohol**

UN No. 1274  
CAS No. 71-23-8

**2** → **DANGER**

**3** → Highly flammable liquid and vapor. Causes serious eye damage. May cause drowsiness and dizziness.

**4** → Keep away from heat/sparks/open flames/hot surfaces. No smoking. Avoid breathing fumes/mist/vapours/spray. Wear protective gloves/protective clothing/eye protection/face protection. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present. Continue rinsing.

Fill Weight: 18.65 lbs.      Lot Number: B56754434  
Gross Weight: 20 lbs.      Fill Date: 6/21/2013  
Expiration Date: 6/21/2020

**5** → Acme Chemical Company • 711 Roadrunner St. • Chicago, IL 60601 USA • www.acmechem.com • 123-444-5567

See SDS for further information.

**6** →










1. **Product Identifier** - Should match the product identifier on the Safety Data Sheet.
2. **Signal Word** - Either use "Danger" (severe) or "Warning" (less severe)
3. **Hazard Statements** - A phrase assigned to a hazard class that describes the nature of the product's hazards
4. **Precautionary Statements** - Describes recommended measures to minimize or prevent adverse effects resulting from exposure.
5. **Supplier Identification** - The name, address and telephone number of the manufacturer or supplier.
6. **Pictograms** - Graphical symbols intended to convey specific hazard information visually.

Sample label courtesy of Weber Packaging Solutions • www.weberpackaging.com

**Figure 1:** GHS Label Elements. Key elements that are required by OSHA include product identifier, signal word, hazard pictograms, hazard statements, precautionary statements, and supplier information.

➤ **GHS PICTOGRAMS**

GHS hazard pictograms providing recognition of the hazards associated with certain substances. They are designed to be immediately recognizable to anyone handling hazardous material. Each pictogram consists of a symbol on a white background framed with a red border and represents a distinct hazard. The pictogram on the label is determined by the chemical hazard classification. While the GHS uses a total of nine pictograms, OSHA only enforces the use of eight. The environmental pictogram is not mandatory for OSHA but may be used to provide additional information.

<p><b>Health Hazard</b></p>  <ul style="list-style-type: none"> <li>• Carcinogen</li> <li>• Mutagenicity</li> <li>• Reproductive Toxicity</li> <li>• Respiratory Sensitizer</li> <li>• Target Organ Toxicity</li> <li>• Aspiration Toxicity</li> </ul>	<p><b>Flame</b></p>  <ul style="list-style-type: none"> <li>• Flammables</li> <li>• Pyrophorics</li> <li>• Self-Heating</li> <li>• Emits Flammable Gas</li> <li>• Self-Reactives</li> <li>• Organic Peroxides</li> <li>• Desensitized Explosives</li> </ul>	<p><b>Exclamation Mark</b></p>  <ul style="list-style-type: none"> <li>• Irritant (skin and eye)</li> <li>• Skin Sensitizer</li> <li>• Acute Toxicity (harmful)</li> <li>• Narcotic Effects</li> <li>• Respiratory Tract Irritant</li> <li>• Hazard Not Otherwise Classified (non-mandatory)</li> <li>• Hazardous to Ozone Layer (non-mandatory)</li> </ul>
<p><b>Gas Cylinder</b></p>  <ul style="list-style-type: none"> <li>• Gases Under Pressure</li> <li>• Chemicals Under Pressure</li> </ul>	<p><b>Corrosion</b></p>  <ul style="list-style-type: none"> <li>• Skin Corrosion/Burns</li> <li>• Eye Damage</li> <li>• Corrosive to Metals</li> </ul>	<p><b>Exploding Bomb</b></p>  <ul style="list-style-type: none"> <li>• Explosives</li> <li>• Self-Reactives</li> <li>• Organic Peroxides</li> </ul>
<p><b>Flame Over Circle</b></p>  <ul style="list-style-type: none"> <li>• Oxidizers</li> </ul>	<p><b>Environment</b> (non-mandatory)</p>  <ul style="list-style-type: none"> <li>• Aquatic Toxicity</li> </ul>	<p><b>Skull and Crossbones</b></p>  <ul style="list-style-type: none"> <li>• Acute Toxicity (fatal or toxic)</li> </ul>



**For more information:**  

**OSHA<sup>®</sup> Occupational Safety and Health Administration**

**Figure 2:** GHS Pictograms. The pictograms represent various hazard categories, including physical, health, and environmental risks.

## B. Safety Data Sheets (SDS)

SDSs provide important information about the hazardous chemical, including its hazards, ingredients, safe handling procedures, and emergency response measures. SDSs consists of 16 sections that detail everything from product identification to first-aid, firefighting, and disposal considerations, ensuring workers can use and handle hazardous materials safely. The sections are noted below.

**Table 1:** The 16 Safety Data Sheet (SDS) sections and a description of the information found in each section.

<b>Safety Data Sheet Sections</b>	
<b>1. Identification</b> <i>Chemical name, synonyms, recommended uses, and supplier contact information.</i>	<b>9. Physical and Chemical Properties</b> <i>Physical properties, color, odor, melting/boiling points, and other physical properties.</i>
<b>2. Hazard(s) Identification</b> <i>Hazard classifications, pictograms, signal words, and hazard statements.</i>	<b>10. Stability and Reactivity</b> <i>Chemical stability and hazardous reaction potential.</i>
<b>3. Composition/Information on Ingredients</b> <i>Chemical ingredients, CAS numbers, and concentration ranges.</i>	<b>11. Toxicological Information</b> <i>Information on acute and chronic health effects.</i>
<b>4. First-Aid Measures</b> <i>Symptoms and effects of exposure, and recommended medical treatment.</i>	<b>12. Ecological Information</b> <i>Potential environmental impacts.</i>
<b>5. Fire-Fighting Measures</b> <i>Suitable extinguishing equipment and hazards that could develop from a fire.</i>	<b>13. Disposal Considerations</b> <i>Methods for safe disposal.</i>
<b>6. Accidental Release Measures</b> <i>Procedures for containing and cleaning up spills, leaks, and releases.</i>	<b>14. Transport Information</b> <i>Information for safe transportation.</i>
<b>7. Handling and Storage</b> <i>Guidelines for safe handling and storage, including ventilation and hygiene.</i>	<b>15. Regulatory Information</b> <i>Relevant regulations.</i>
<b>8. Exposure Controls/Personal Protection</b> <i>Recommended personal protective equipment (PPE) and engineering controls.</i>	<b>16. Other Information</b> <i>Other relevant details, including the date of preparation or revision.</i>

SDSs are obtained from the chemical manufacturer, importer, or distributor. The name on the SDS label will be the same as that listed on the chemical inventory list. The Environmental Health & Safety Specialist will maintain and update the master file of all original SDSs for the Maintenance, Operations and Facilities Use departments. Hard copies of the master file are located in every location where chemicals are stored throughout the entire district.

### C. Department of Transportation (DOT)

DOT labels identify hazardous materials during transport, providing critical information about the material's hazard class, such as its potential for explosion, flammability, or toxicity. They are found on the outside of hazardous materials containers shipped to the schools. DOT labels are not required for the storage of hazardous material containers; however, it is required for all hazardous waste containers shipped off site for waste disposal.



**Figure 3:** Examples of DOT labels for the various chemical hazards.

Multiple labels can be utilized in order to accurately categorize and denote the chemical hazard and safety precautions necessary for the chemical.

School District staff or contractors must label outgoing packages in accordance with the applicable DOT regulation on hazardous materials under Title 49 CFR, or if transporting by aircraft, under applicable international air transportation association IATA rules before moving off site.

### D. National Fire Protection Association (NFPA 704)

The National Fire Protection Association (NFPA 704) Diamond is a standardized system for identifying the hazards of materials in an emergency response. It is intended to provide basic information for emergency personnel to better assess and evaluate what firefighting technique to employ. The NFPA 704 Diamond consists of a four-quadrant diamond shape with numerical ratings (0 to 4) indicating severity and special symbols to warn emergency personnel about the health (blue), flammability (red), instability (yellow), and special hazards (white) of a material.



Figure 4: NFPA 704 Diamond

The NFPA 704 labels are found on buildings that store chemicals and are posted on the science prep room doors at every school site at SMUHSD.

### E. Proposition 65 List of Chemicals

The Environmental Health & Safety (EH&S) Specialist is responsible for monitoring updates to the California Proposition 65 list of chemicals. This includes reviewing the California Office of Environmental Health Hazard Assessment (OEHHA) website annually to obtain the most current version of the list and ensuring timely communication of any changes to affected employees.

When new chemicals are added to the Proposition 65 list, the associated warning requirements become effective 12 months from the date of listing. If any Proposition 65-listed chemicals are present or used on-site, a clearly visible Proposition 65 warning sign may be posted at the main entrance of the school site. This can be done in lieu of placing individual warning signs and notifying each employee separately.

## II. Labels

### A. Chemical Labeling

The primary label is affixed to the chemical container by the manufacturer. Only authorized personnel are permitted to receive chemical deliveries and are responsible for verifying that the chemicals are accurate and properly labeled. Chemicals that are purchased or used on the SMUHSD sites will be documented into the Chemical Inventory list.

### B. Hazardous Waste Labels

All hazardous waste storage containers (>35 gallons) must be labeled with a hazardous waste accumulation label completed including the date when the first waste is placed in the container or waste bag. A yellow hazardous waste label must be attached to designated containers and must be legible, prominently displayed, and placed on the side of the container, not the lid. The label must include the contents (no abbreviations), the name and address of the school or facility, phone number, accumulation start date, and hazardous waste properties, such as flammable, corrosive, toxic, reactive, or oxidizer.

**HAZARDOUS WASTE**

**FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR  
THE CALIFORNIA DEPARTMENT OF HEALTH.**

**GENERATOR INFORMATION:**

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

EPA ID NO. / MANIFEST DOCUMENT NO. \_\_\_\_\_ / \_\_\_\_\_

EPA WASTE NO. \_\_\_\_\_ CA WASTE NO. \_\_\_\_\_ ACCUMULATION START DATE \_\_\_\_\_

CONTENTS COMPOSITION \_\_\_\_\_

PHYSICAL STATE:  SOLID  LIQUID

HAZARDOUS STATE:  FLAMMABLE  TOXIC  
 CORROSIVE  REACTIVITY  OTHER \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

D.O.T PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

**HANDLE WITH CARE!**

Figure 5: Example hazardous waste label.

**C. Universal Waste Labels**

All universal waste storage containers must be labeled with a Universal Waste Label that includes the item type, location and the first day when 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.



**Figure 6:** Universal Waste label.



## **SECTION 3 – EMPLOYER RESPONSIBILITIES**

### **I. Information and Training**

Per OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry) requirements employers are responsible to provide information and training to all employees. All SMUHSD employees are covered by the hazard communication program and should receive information and training before exposure to hazardous chemicals and whenever new chemical hazards are introduced to their work area:

- Operations in the work area where hazardous chemicals are present including changes in the chemicals being used
- 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

### **II. 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 are responsible for notifying their immediate supervisor prior to performing any non-routine task. 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, 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 or 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.

### **III. Contractors**

It is the contractor’s responsibility to enforce safe work practice requirements, regulations, and guidelines to their employees and ensure that company employees are not exposed to safety and health hazards from work being performed. They are required to comply with all OSHA standards and District policies HazCom, Injury & Illness Prevention Programs while working on SMUHSD property. SMUHSD is not responsible for the supervision, training, or enforcement of the contractor’s safety practices, nor liable for any injuries, incidents, or damages resulting from the contractor’s failure to comply with applicable safety regulations, procedures, or industry

standards. Contractors must maintain full control of their operations and implement all necessary safeguards to protect their employees, SMUHSD personnel, and district property.

Prior to beginning work, the Environmental Health and Safety (EHS) Specialist will inform contractors of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. Appropriate controls will be established with the contractor and their employees to ensure that District employees are not exposed to safety and health hazards from work being performed by the contractor. The Environmental Health and Safety Specialist will inform contractors and their respective employees of required engineering and work practice controls, mandatory personal protective equipment, and other necessary precautions to ensure employee safety during normal operations and foreseeable emergencies.

#### **IV. Recordkeeping**

Records pertaining to the hazard communication program will be maintained by the Environmental Health & Safety Specialist.

The Environmental Health & Safety Specialist will keep the following records:

- Chemical inventory list
- Hazardous material reviews
- Employee training requirements
- Employee training records for Maintenance, Operations, and Facilities Use

San Mateo Union High School District Human Resources will keep the following records:

- Documentation of initial orientation and onboarding training sessions.
- Injury and illness records for five years following the end of the calendar year
- Medical monitoring and surveillance records for at least 30 years

In California public school districts, employers are required to maintain Cal/OSHA injury and illness records for five years following the end of the calendar year it covers. It must be updated if new or revised information becomes available. This includes Forms 300 (Log of Work-Related Injuries and Illnesses), 300A (Annual Summary), and 301 (Incident Report) report forms. These medical records must be maintained for the duration of employment plus 30 years following the separation from the district. Personnel files are only retained for three to four years after separation. However, longer retention is often recommended for legal and risk-management purposes.

## Signatory Page

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

Signed by:

*Randall P. Booker*

3732C100AA9E403...  
Randall P. Booker, Superintendent of SMUHSD

2/25/2026

Date

Signed by:

*Linda Carlton*

D286A0E70740472...  
Linda Carlton, Director of Maintenance,  
Operations and Facilities Use

2/26/2026

Date

DocuSigned by:

*Robin Clemens*

987DAFC9024E48E...  
Robin Clemens,  
Environmental Health & Safety Specialist

2/25/2026

Date