

Escondido Union High School District



Hazard Communication Plan

Updated June 2017

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Introduction

To enhance our employees' health and safety, Escondido Union High School District has developed, implemented, and maintains a hazard communication program that ensures effective communication about associated hazards of some of the substances in our workplace, and the control of these hazards through a comprehensive hazard communication plan.

This plan establishes District procedures in, or provides information regarding:

- Inventory of hazardous substances
- Safety Data Sheets
- Labeling of hazardous substances
- Training of Employees
- Safety Practices in non-routine tasks
- Providing Information to Contractors

This plan will be made available, upon request, to employees and designated employee representatives. This plan will also be accessible to all District Employees on the Escondido Union High School District website.

Globally Harmonized System (GHS)

Federal OSHA's Hazard Communication Standard has been revised to align with the Globally Harmonized System of Classification and Labeling of chemicals (GHS). This update to the Hazard Communication Standard will provide a common and coherent approach to classifying chemicals and communicating hazard information on labels and Safety Data Sheets.

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.
- Information and Training: Employers are required to train workers on the label elements and Safety Data Sheets format to facilitate recognition and understanding.

Hazardous Substance Inventory

All hazardous substances used in the District will be identified and an inventory list maintained, which lists each substance by chemical name and/or commercial name of the substance. The name used will be the one most prominently displayed on the container and/or Safety Data Sheet.

Any substance listed in the California Occupational Safety and Health Regulations List of Hazardous Substances (Chapter 3.2, Subchapter 1, Article 5, Section 339), or containing any type of label warning regarding health or physical hazards, shall be considered hazardous, and will be listed on the Hazardous Substance Inventory.

The Inventory will be compiled by worksite and maintained at the following locations:

- School Administration Office
- Maintenance Director's Office
- Transportation Office
- Student Nutrition Director's Office
- District Risk Management Office

At the school sites, each department that uses hazardous substances will have a Hazardous Substance Inventory pertaining to their department and the hazardous substances used.

A master copy of the Hazardous Substance Inventories shall be maintained by the District Safety Officer.

Use of hazardous substances not listed on the Hazardous Substance Inventory is prohibited.

** Proposition 65 List of Chemicals

The Safety Officer 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, the necessary warning will take effect 12 months from the date of listing.

Safety Data Sheets (SDS)

Safety Data Sheets will be obtained and maintained for all substances identified as hazardous in accordance with this plan.

Copies of each Safety Data Sheet applicable to specific worksites will be maintained at the worksite, and will be available to any employee upon request. They will also be made available, upon request, to any designated employee representative or physician.

The following locations are designated as the locations responsible for maintaining copies of the appropriate Safety Data Sheets:

School Sites

The Administration Office at each school will maintain Safety Data Sheets for general classroom and janitorial supplies.

Safety Data Sheets for science labs, industrial arts, and arts and crafts classrooms will be maintained in those facilities.

Maintenance

Safety Data Sheets will be maintained in the Director's Office.

Student Nutrition

Safety Data Sheets will be maintained in the office of each kitchen facility and the Director's Office.

Transportation

Safety Data Sheets will be maintained in the Director's Office.

District Office

Safety Data Sheets will be maintained in the Risk Management Office.

Manufacturers are required to provide Safety Data Sheets with each initial shipment of a hazardous substance and whenever there is a change in the information provided on any current Safety Data Sheet. If a Safety Data Sheet is not available for a substance listed on the Hazardous Substance Inventory, a letter will be forwarded to the manufacturer or distributor requesting that Safety Data Sheet be provided.

Labeling of Hazardous Substances

Employers are required to use legible labels and other forms of warning to clearly and quickly communicate what's in a container, its hazards, the safety precautions, and the name and address of the manufacturer. Labels and other forms of warning are to be conspicuously placed on containers so that the message is readily visible. Labels should not be removed, if torn or defaced, *they must be replaced*.

To ensure compliance, only material purchased and/or approved by the District will be permitted in any District location.

Non-labeled, or improperly labeled containers, portable or fixed, will have the appropriate label information attached prior to filling or using.

Original containers received which do not meet current labeling requirements will have the appropriate information attached before use. The purchasing office will be notified of the discrepancy, and will forward a letter to the manufacturer or distributor noting the problem and requesting corrective action.

Hazardous substances shall not be transferred from the original container to another container without the permission and direction of a supervisor. It is the responsibility of the supervisor to be certain the new container has the proper label and information and the label is securely attached to the container.

Substances that do not have the proper label and/or cannot be identified are not to be used, handled, or stored.

Employee Information and Training

Employees who use, or may be exposed to, hazardous substances are to attend Global Harmonization System (GHS), Right-to-Know, and Hazard Communication (HazCom) Training prior to starting work and annually thereafter. This training session will be coordinated by the Safety Officer and will provide information on the following:

- Regulations (Title 8 CCR 5194, CFR 1910.1200, CalOSHA)
- Hazard Communication (HazCom)
- Global Harmonization System (GHS)
- Labeling (Primary and Secondary Container)
- Safety Data Sheets (SDS)
- Workplace Hazards
- Routes of Entry (Inhalation, Ingestion, Absorption, Injection)
- Types of Exposure (Chronic, Acute)
- Chemical Groups (Physical Hazards, Health Hazards, Environmental Hazards)
- Pictograms
- Personal Protective Equipment (PPE)
- Role of Individual in Safety Program

Site Training

Operations and procedures training for specific hazardous substances pertaining to a site will be the responsibility of department directors, school principals, or direct supervisors.

The required training will be conducted prior to initial assignment of a job requiring the use of hazardous substances, and whenever a new hazard is introduced into the workplace.

The requirements of this section may be met either by group training sessions, or by providing written material to individual employees.

Group Training: Groups of employees exposed to the same hazardous materials may be trained by a designated employee. The training will provide a review of the material covered by appropriate Safety Data Sheets, with emphasis on the health hazards, handling precautions, required personal protection devices and emergency and disposal procedures.

Upon completion of each training session, a District Safety Training Report will be completed, listing the attendees and Safety Data Sheets reviewed. Each completed report will be forwarded to the District Safety Officer.

Individual Training: Individual training may be conducted by providing individual employees with a copy of a Safety Data Sheet for each hazardous substance to which they may be exposed. After thoroughly reviewing each Safety Data Sheet, the employee will complete, and sign, a District Training Report, listing the Safety Data Sheets reviewed, and forward it to the District Safety Officer.

Hazard Monitoring

Whenever there is a suspected release of a hazardous substance in the work environment, notify your supervisor and the District Safety Officer immediately. If warranted, a board certified industrial hygienist will be contacted by the District to monitor the levels of concentration and to make appropriate recommendations.

If you have a hazardous materials spill that cannot be immediately controlled by those on site, call 911 and request assistance from the Fire Department.

Hazardous Non-Routine Tasks

Periodically, an employee is required to perform hazardous non-routine tasks. Employees will not perform any task outside their regularly assigned duties which involves the use of any hazardous substance(s) until the following requirements have been complied with.

- All hazardous substances to be used are identified in accordance with this plan.
- Safety Data Sheets for all hazardous substances to be used are made available in accordance with this plan.
- All training involving the use of the required hazardous substances has been completed in accordance with this plan.

Assignment of non-routine tasks requiring the use of any hazardous substance should be carefully reviewed to determine the necessity, and possible alternatives, by the department supervisor.

Informing Contractors

Each contractor who is performing work in District facilities will be provided a copy of the Hazardous Substance Inventory for each area where their employees will be working. A copy of each applicable Safety Data Sheet will also be provided.

Each contractor will provide a Safety Data Sheet for each hazardous substance which they will use in District facilities. These sheets will be provided to the District Safety Officer prior to the start of any work requiring the use of hazardous substances. The Safety Data Sheets should also be made available to the employees working in the affected area(s).

Hazardous Waste Handling, Storage, and Disposal

Federal, state and local environmental impact regulations require strict control of handling, storage, and disposal of all materials which have been designated as hazardous or toxic to human health or to the environment. Once these materials have been used, specific restrictions apply to their handling, storage, and disposal.

Storage of Materials

- No used hazardous material shall be stored on site for a period of more than 90 days.
- Prior to disposal, all used hazardous materials shall be identified and stored in U.S. Department of Transportation approved storage drums with lids. The drums shall indicate the type of material stored and the date such material was put in the drum.
- Required storage drums to be used for waste oils, sludges, and solvents shall be approved by the District Safety Officer.

Restrictions Governing Disposal of Waste Materials

- A manifest list will be prepared and copies filed with the District Safety Officer for each incident of hazardous waste disposal. Originals shall be retained on site in a disposal manifest file. Disposal manifests are subject to regular inspection by the Hazardous Materials Management Unit of San Diego County Department of Health Services. Appropriate fines can be levied for noncompliance. The disposal manifest is provided by the Hazardous Material Disposal Company that does disposal for the District.
- No hazardous material may be dumped in drains, sewers, dumpsters, or onto the ground.
- All materials shall be identified and stored in labeled storage drums (with lids) which have been approved by the U.S. Department of Transportation.
- Waste from auto shop operations shall be disposed of according to the type of waste involved.

Hazardous Material Inventory Spreadsheet

School: _____

Inventory Date: _____

Person Completing Inventory _____
Last Name First Name

Building: _____

Room: _____

Department _____

Phone: _____

Chemical Name	Manufacturer	Maximum Quantity	CAS Number	SDS on File?
<i>(example) Ethyl Alcohol</i>	<i>Sigma</i>	<i>4 L</i>	<i>64175</i>	<i>yes</i>

INSTRUCTIONS: Fill out an inventory sheet for each room. Keep a copy in the room and give the original to your site secretary.

District Safety Training Report

School:
Department:
Date of Training:
Training Topic:
Training Conducted by:

Employee Name

Job Title

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Submitted by _____

Date _____

Complete this form and forward to the District Safety Officer.