

Perris Union High School District

Hazard Communications Plan (HCP)

CCR Title 8, § 5194

TABLE OF CONTENTS

		<u>Page</u>
Ι	INTRODUCTION	3
Π	REGULATORY BACKGROUND	3
III	PROGRAM COORDINATOR	3
IV	EMPLOYEE INFORMATION AND TRAINING	4
V	LABELS AND OTHER FORMS OF WARNINGS	5
VI	TOXICITY AND EXPOSURE	5
VII	HAZARDOUS SUBSTANCE MATERIAL INVENTORY	6
VIII	PERSONAL PROTECTIVE EQUIPMENT	7
IX	PURCHASING HAZARDOUS SUBSTANCES	7
Х	HANDLING AND STORAGE OF HAZARDOUS SUBTSANCES	8
XI	DISPOSAL PROCEDURES	8
XII	NON-ROUTINE TASKS	9
XIII	OUTSIDE CONTRACTORS	9

Appendix A	Glossary
Appendix B	Sections of the Material Safety Data Sheet
Appendix C	Some General Guidelines for Storing Chemicals
Appendix D	Request to Remove Used Chemicals

I. INTRODUCTION

This program has been developed to provide employees who use, or who may be exposed to, hazardous substances, the necessary information to safely work with those substances. The Hazard Communication regulations require that manufacturers and suppliers prepare particular information about their products and provide that information to any purchaser (user) of those products. These regulations apply to any hazardous substance known to be present in the work place to which employees may be exposed under normal working conditions or in a reasonably foreseeable emergency.

A copy of the written Hazard Communication Program can be found at each school site in the Material Safety Data Sheet (MSDS) binder that has been installed in the employee lounge or employee workroom; in Maintenance & Operations; and posted on the District's web page under Risk Management. Additional copies will be made available to all employees upon request.

These plans, in conjunction with the employee training program, are important tools in providing information concerning hazardous substances used at the school and district sites. Training will be presented to all new employees when they attend the New Employee Orientation and/or by their supervisor/administrator or Risk Manager with an attendance record kept. If you have further questions concerning Hazard Communication, please contact your supervisor, administrator or the Risk Manager. The Risk Manager can be reached at (951) 943-6369 Ext 80281.

II. REGULATORY BACKGROUND

The hazard communication regulation was established to ensure that the hazards associated with substances used in the workplace were identified, and that the information was communicated to all affected employees through a comprehensive Hazard Communication Program (HCP). The regulations which outline this requirement can be found in:

- 1. California Code of Regulations (CCR), Title 8, Division 1, Chapter 4, Section 5194 (General Industry Safety Orders);
- 2. State of California Labor Code (Sections 6360-6399.7);
- 3. Code of Federal Regulations (CFR) Title 29, Section 1910.1200.

III. PROGRAM COORDINATOR

The District designates the Risk Manager as the Program Coordinator, who shall be responsible for ensuring that the use, storage and disposal of hazardous substances is completed in accordance with the guidelines set forth in this document and the local Certified Unified Program Agency (CUPA). The Risk Manager can be reached at (951) 943-6369 Ext 80281.

IV. EMPLOYEE INFORMATION AND TRAINING

All employees are required to attend training on the Hazard Communication regulations. Training is required of new employees prior to their commencing work with hazardous substances, or for any employee when a new hazardous substance is introduced or discovered in the work place. Training for employees shall consist of at least the following.

- 1. Informing employees of the requirements in this program, and the location of the written Hazard Communication Program. (see section I, Introduction, for locations).
- 2. Informing employees of any operations at their site where hazardous substances are present.
- 3. Training employees in the methods and observations that may be used to detect the presence or release of hazardous substances in the work area (such as inspections of the work areas, continuous monitoring devices, visual appearance, or odor of hazardous substances when released, etc.).
- 4. Informing employees of the physical and health hazards of the substances in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous substances, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- 5. Informing employees of the container labeling system, material safety data sheets (MSDS), and how employees can obtain and use the appropriate hazard information.
- 6. Informing employees of the following rights:
 - a. The right to personally receive information regarding hazardous substances to which they may be exposed, according to the provisions of this section;
 - b. The right against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.
- 7. Whenever the employer receives new or revised information related to hazardous substances in the workplace, the information will be provided to the employees. If the new information indicates significantly increased risks to, or additional measures necessary to protect employee health, the Program Coordinator shall review the substances to ensure they are appropriate and necessary for conducting work.

8. Employees will be informed that they are required to comply with all safety rules and regulations implemented for the purchase, storage, handling, use, and disposal of hazardous substances or wastes. Employees shall be informed that failure to comply with these rules and regulations may result in disciplinary action in accordance with the District's practice and policy.

V. LABELS AND OTHER FORMS OF WARNINGS

Any container in the work place that holds a hazardous substance is required to have a proper identification label. Any container into which a hazardous substance has been transferred from a properly labeled container must also bear the appropriate label. Employees should not use substances from unlabeled containers. A label on any container received from the manufacturer or supplier must include, at least, the following information.

- 1. Name of the product/substance.
- 2. A list of the hazardous ingredients.
- 3. The appropriate hazard warning(s) (flammable, toxic, corrosive, or oxidizer).
- 4. Manufacturer's or supplier's name and address.
- 5. Manufacturer's phone/contact information.

If a substance is transferred from its original container to another container (secondary container), a label must be affixed to that new container. The new label must contain at least the following information.

- 1. Name of the product/substance.
- 2. The appropriate hazard warning(s) (flammable, toxic, corrosive, or oxidizer).
- 3. Manufacturer's or supplier's name and address.
- 4. Manufacturer's phone/contact information.

Supervisors, Administrators, Department Chairpersons are responsible for ensuring that the containers in their work area remain properly labeled and that the employees understand the labels.

VI. TOXICITY AND EXPOSURE

Toxic substances or chemicals are considered toxic if they can cause either short-term (acute) or long-term (chronic) health effects. A toxic substance is a health hazard only when it has entered the body; however, there is no substance or chemical that is completely nontoxic.

Toxicity is dependent on several factors, including route of entry, degree of exposure, length of exposure, concentration of chemical, and a person's susceptibility. Toxicity is also affected by human factors such as age, diet, heredity, lifestyle, and exposures to other chemicals. The entry point of a toxic substance is commonly referred to as the "route of entry." Because no substance has the same route of entry, it is important for employees to review the MSDS to become aware of the entry routes for the chemicals they may be working with. Exposure to

toxic substances may occur through the following routes: 1. absorption, 2. ingestion, 3. inhalation, or 4. injection.

- 1. Absorption This is the most common of the four routes of entry. Absorption takes place as the chemical comes in contact with the skin and destroys some of the protective outer layer, thus allowing the toxic chemical to come in contact with the inner tissues and possibly the bloodstream.
- 2. Inhalation Toxic substances can create dusts, fumes, mists, vapors, and smoke that can become airborne and affect the air being inhaled. The toxic substance is thus allowed to enter the respiratory tract through the nose and mouth and move downward through the windpipe and into the lungs.
- 3. Ingestion A toxic material when ingested is absorbed through the stomach and intestines into the bloodstream. The bloodstream may carry the toxic substance to the liver, which may or may not be able to detoxify all of the toxic materials. Liver cells may be destroyed.
- 4. Injection Exposure to toxic chemicals by injection occurs very seldom. However, injection can occur as the result of puncturing the skin with glass, metals, or other materials that are contaminated by toxic substances, or when syringes contain toxic substances.

Exposures to toxic substances are the result of many factors, including

- a. Lack of qualified personnel;
- b. Insufficient training;

c.

- 1. Not following safety procedures
- 2. Not using proper personal protection equipment
- Failure or misuse of personal protection equipment;
- d. Failure to decontaminate after a spill or splash.

The concentration of the toxic substance is based on the dose a person receives over a specific time. The effect of a substance is a result of the dose received and the toxicity of the substance. The concentration and effect of toxic substances has prompted OSHA to issue and enforce Permissible Exposure Limits (PEL). In addition, the American Conference of Governmental Industrial Hygienists (ACGIH) also produces a list of what they refer to as Threshold Limit Values (TLVs) for common chemicals used in the work place. These TLVs are meant as guides to ensure that employees are not exposed to a toxic substance more than is necessary.

VII. HAZARDOUS SUBSTANCE/MATERIAL INVENTORY

An inventory of the hazardous substances known to be used at each district administrative and school site can be found in the Material Safety Data Sheet (MSDS) binder that has been

installed in the employee lounge or employee workroom, in Maintenance & Operations, and posted on the District's web page under Risk Management.

Specific chemical or hazardous substance information is contained in the Material Safety Data Sheet (MSDS). Supervisors, administrators and chairpersons will ensure that employees are aware of the location of the MSDS binder and of any new or updated MSDSs received by his/her department/school site. The supervisor, administrator and chairpersons will review any new or updated MSDSs with affected employees when they are received.

Electronic MSDS folders for all Perris Union High School District sites are also available and can be accessed through **SchoolMSDS** an internet-based tool for viewing MSDS, for keeping track of chemical inventories; and for adding MSDS when a new chemical or product is purchased or is brought on to a PUHSD school or district location. To access the electronic MSDS files go to http://puhsd.ca.schoolmsds.com/

• Please ask your site administrator or call Risk Management if you cannot locate the MSDS for a specific chemical or product, or if a MSDS needs to be added because a new chemical or product has been purchased. (951) 943-6369 x 80281 or x 80282.

VIII. PERSONAL PROTECTIVE EQUIPMENT

Employees using hazardous substances should review the respective MSDSs for information on required personal protective equipment (PPE) and precautions that should be taken to ensure against exposure, injury or illness. Employees should not work with or use hazardous substances for prolonged or repeated periods unless the proper precautions have been taken to keep exposures to safe levels.

It is extremely important that supervisors, administrators and chairpersons instruct all employees in their area to follow the manufacturer's guidelines regarding a chemical's use and its required ventilation. Use of laboratory fume hoods may be an essential part of the curriculum or prep work conducted within the department. All fume hoods must be inspected by a qualified person at least once per year to ensure that it meets the standards and ventilation requirements set forth by the manufacturer. The posting of the inspection tag on each hood indicates it is in good working order as outlined above. If the hood requires repair, it shall be taken out of service and a sign posted.

IX. PURCHASING HAZARDOUS SUBSTANCES

An effectively managed hazardous materials program begins with the appropriate purchasing controls. Because disposal of hazardous substances is becoming increasingly costly, substances used by all departments and school sites should only be purchased in quantities necessary to do a job. The purchaser, in conjunction with the Purchasing Department, will be responsible for obtaining an MSDS for each hazardous substance that is ordered /delivered.

If at any time a substance containing an extremely hazardous or acutely toxic substance (as defined in the California Code of Regulations and the Federal Code of Regulations) is requested to be purchased, the requestor should provide the following information to the

Purchasing Department : a) a written statement demonstrating an overwhelming need for that substance; and b) a comprehensive, written safety program detailing the storage procedures; who will use this chemical and under what conditions; how unauthorized personnel will be kept from using or handling the substance; the necessary safety precautions and emergency procedures associated with using the substance; expected shelf life of substance; and how disposal of substance will be handled. If it is determined that all of the safety rules for its use can be met, the substance may be purchased. If subsequent findings determine the substance is not being used according to the rules set, the privilege to use it will be immediately revoked. The quantity to be purchased for this type of special request will be no more than what can be used during one school year.

X. HANDLING AND STORAGE OF HAZARDOUS SUBSTANCES

Each hazardous substance should be handled, used, and stored in accordance with the information provided by the manufacturer through its container labels, MSDSs, and other standards of practice. Hazardous substances should be handled only with proper protective equipment and only under the proper conditions. Carcinogens, radioactive materials and biological materials shall not be used within the District.

The proper storage of hazardous substances is as important as their proper handling. Inadequate storage space can result in overcrowding and the storage of incompatible chemicals. Shelf-stored hazardous substances should be visually checked on a regular basis by the department chairperson (or designee). This visual inspection will help identify those substances that may be leaking, have corroded caps, or have developed other problems which indicate that they should be immediately disposed of in a safe manner. Storage shelves and cabinets should have sufficient lips, edges or restraints to prevent bottles or other containers of hazardous substances from falling.

XI. DISPOSAL PROCEDURES FOR HAZARDOUS SUBSTANCES/WASTES

The proper disposal of hazardous substances is the responsibility of all employees. Hazardous substances must not be disposed of into the sanitary sewer system (e.g., sink). Once a hazardous substance is determined to no longer be useful to the site or department staff, it shall require proper disposal.

The employee shall notify the Risk Manager (or designee) that such removal is necessary. The same employee, supervisor, administrator or chairperson then completes and submits the *Request to Remove Used Chemical Form along with* an inventory of those items designated for removal that includes the quantity, location and their condition. See Appendix D for the form to Request to Remove Used Chemical(s).

Hazardous waste if so designated shall be removed under contract with a licensed company. Maintaining all documentation and manifests created for any such removal is the responsibility of Risk Management who should receive all original documents.

XII. NON-ROUTINE TASKS

Department supervisors, administrators and chairpersons shall determine if their employees might be involved in non-routine tasks. These tasks will be identified when assigned and additional training regarding health and safety shall be conducted prior to the beginning of the task.

XIII. OUTSIDE CONTRACTORS

To ensure that outside contractors and their personnel work safely within the District, the Purchasing Department will include any known hazardous materials in the contract documents including the location of the MSDS binders for the areas in which they are working. In addition, outside contractors must provide a list and MSDSs for any hazardous substances they will be using at District facilities to complete their work obligations. The outside contractor is responsible for having trained his/her employees in understanding a MSDS, proper label identification, and the appropriate safety precautions necessary to prevent any harmful exposures. The contractor shall also be notified that he/she (as part of their contract) must remove and properly dispose of any hazardous waste/substance they generate.

APPENDIX A

Glossary

<u>CHEMICAL</u>: Any element, chemical compound or mixture of elements and/or compounds.

<u>CHEMICAL NAME</u>: The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.

<u>COMMON NAME</u>: Any designation or identification such as code name, code number, trade name, branch name or generic name used to identify a chemical other than by its chemical name.

<u>CONTAINER</u>: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

<u>EMPLOYEE</u>: A teacher, student, or district employee who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

EXPOSURE OR EXPOSED: An employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption).

<u>FORESEEABLE EMERGENCY</u>: Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.

<u>HAZARD WARNING</u>: Any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s).

HAZARDOUS CHEMICAL: Any chemical which is a physical hazard or a health hazard.

<u>HEALTH HAZARD</u>: A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

<u>IDENTITY</u>: Any chemical or common name which is indicated on the material safety data sheet (MSDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the MSDS.

<u>IMMEDIATE USE</u>: The hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

<u>LABEL</u>: Any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

<u>LABORATORY SCALE</u>: Work with substances in which the containers used for reactions, transfers, and other handling of substances are designed to be easily and safely manipulated by one person. "Laboratory scale" excludes those workplaces whose function is to produce commercial quantities of materials.

LABORATORY USE OF HAZARDOUS CHEMICALS: Handling or use of such chemicals in which all of the following conditions are met: (i) Chemical manipulations are carried out on a "laboratory scale"; (ii) Multiple chemical procedures or chemicals are used; (iii) The procedures involved are not part of a production process, nor in any way simulate a production process; and (iv) Protective laboratory practices and equipment are available and in common use to minimize the potential for employee exposure to hazardous chemicals.

<u>MATERIAL SAFETY DATA SHEET (MSDS)</u>: Written or printed material concerning a hazardous chemical which is prepared in accordance with paragraph (g) of 29 CFR 1910.1200, to be provided by the manufacturer, importer, or distributer of the chemical.

<u>PHYSICAL HAZARD</u>: A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

<u>USE</u>: To package, handle, react, emit, extract, generate as a byproduct, or transfer.

<u>WORK AREA</u>: A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

<u>WORKPLACE</u>: An establishment, job site, or project, at one geographical location, containing one or more work areas.

APPENDIX B Sections of the Material Safety Data Sheet

1. <u>Chemical Identity</u>

a. If the chemical is a single substance, it should have the chemical, trade, and common name(s).

b. The chemical identity on the MSDS should be cross-referenced to an identifier found on the label.

2. <u>Hazardous Ingredients</u>

a. If the hazardous chemical is a mixture which has been tested as a whole to determine its hazards, the chemical and common names of the ingredients that are associated with the hazards, and the common name of the mixture itself, must be listed.

b. If the chemical is a mixture which has not been tested as a whole (most probable since very few mixtures are tested), all ingredients that are not carcinogens, but are health or physical hazards and comprise 1 percent or more of the mixture, must be listed.

c. Carcinogens (e.g., OSHA list, IARC Monographs, NTP list) must be listed if they are present in the mixture at levels of 0.1 percent or greater.

d. All components of a mixture that have been determined to present a physical hazard must be listed.

3. <u>Physical and Chemical Characteristics</u>

a. The physical and chemical characteristics of the hazardous substance reflect the properties of the compound. These include such items as boiling and freezing points, density, vapor pressure, specific gravity, solubility, volatility, and the product's general appearance and odor.

4. <u>Physical Hazards</u>

a. The compound's potential for fire and explosion must be described. This section explains the fire hazards of the product and the conditions under which the product could ignite or explode. An MSDS also provides information on recommended extinguishing agents and fire fighting methods.

b. This section also presents information about other chemicals and substances with which the chemical is incompatible, or with which it reacts. Information on decomposition products, such as carbon monoxide, is included.

5. <u>Health Hazards</u>

a. The health hazards of the chemical, together with signs and symptoms of exposure, must be listed. In addition, any medical conditions which are generally associated with exposure to the compound, or which exposure to the compound can aggravate, must be included. The specific types of health hazards defined in the standard include

carcinogenicity, corrosives, toxicity, irritants, sensitizers, mutagenicity, teratogenicity, and target organ effects, such as, liver, kidney, nervous system, blood, lung, mucous membranes, reproductive, skin, and eye effects.

b. The route of entry section describes the primary pathway by which the chemical enters the body. There are three principal routes of entry: inhalation, skin, and ingestion.

c. This section of the MSDS supplies the OSHA Permissible Exposure Level (PEL), the ACGIH Threshold Limit Value (TLV), as well as other exposure levels used or

recommended by the chemical manufacturer.

d. If the compound is listed as a carcinogen by OSHA, NTP or IARC, it must be so indicated on the MSDS.

6. Special Precautions, Spill, Leak, and Cleanup Procedures

a. The standard requires the preparer to describe applicable precautions for safe handling and use which are known. These include recommended industrial hygiene practices, precautions to be taken during repair and maintenance of equipment, and procedures for cleaning up spills and leaks. Some companies also use this section to include useful information not specifically required by the standard, such as EPA waste disposal methods and State and local requirements.

7. <u>Control Measures</u>

a. The standard requires the preparer of the MSDS to list any generally applicable control measures. These include engineering controls, safe handling procedures, and personal protective equipment. Information on the use of goggles, gloves, body suits, respirators, and face shields is often included.

8. <u>Emergency and First Aid Procedures</u>

a. This part of the MSDS deals with the actions that should be taken in the event of an accidental overexposure. Different procedures are usually given to deal with inhalation, ingestion, skin, or eye exposures.

9. <u>Responsible Party</u>

a. The standard specifies that the MSDS preparation date or the date of the last change be provided. In addition, the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party preparing or distributing the MSDS must be included.

APPENDIX C

Some General Guidelines for Storing Chemicals from Specific Hazard Classes

Flammable Liquids

Conditions for Storage: Store in a cool place away from heat, sun or source of ignition. Automatic fire detection equipment and spray devices should be used. Adequate ventilation should be provided to prevent vapor buildup. Use approved storage cabinets or safety cans for flammable liquids. Ground metal containers.

Store away from: Oxidizers, chemicals capable of spontaneous heating, explosives, materials that react with air or moisture to liberate heat, and ignition sources.

Corrosive Chemicals

Conditions for Storage: Separate acids from bases. Separate oxidizing acids (e.g. nitric acid) from other acids. Cabinets should be non-corroding or covered with fume resistant paint. Corrosives should not be stored above eye level. Use bottle carriers for transporting containers of corrosives. Have spill control pillows and neutralizing materials readily available.

Store away from: Toxic materials, active metals (sodium, magnesium, etc...), substances that release corrosive, toxic or flammable fumes on reaction, organic materials, flammable substances, and uncoated structural materials.

Toxic Chemicals

Conditions for Storage: Store away from heat, moisture and fire hazard areas. Protect from contamination with acids and fumes.

Store away from: Acids and other corrosives, reactive chemicals, fire hazards, heat, and moisture.

Reactive Chemicals

Conditions for Storage: A fire sprinkler, except where water sensitive chemicals are stored. Protect from extremes of temperature and rapid changes in temperature. Store oxidizers away from flammable or combustible materials, and away from reducing agents such as zinc and alkaline earth metals. Store peroxide-forming chemicals in airtight containers and label with receiving and disposal dates (these chemicals can form explosive peroxides that can be detonated by shock or heat). Store light sensitive chemicals in amber bottles.

Store away from: Organic materials, flammable materials, corrosives, and toxic materials.

Water and Air Sensitive Chemicals

Conditions for Storage: Store in waterproof, fire-resistant cabinet or room. Smoke and/or heat detector should be provided in storage area. Eliminate all ignition sources.

Store away from: Water and moist air, solutions of aqueous acids and bases, flammable storagearea, and reactive chemicals.

APPENDIX D

Request to Remove Used Chemicals (Page of) (Complete and submit to the District Risk Management Department)			
School:	Date:		
Contact Person:			
Use this form to initiate the removal process for school premises. List each used chemical below (be sure the container is properly label	container as a separate item in the box		
Building Location:			
Form (circle one): solid liquid gas solution			
Quantity (oz., gallons, pounds, etc)			
Chemical name:			
Contents:			
Building Location:			
Form (circle one): solid liquid gas solution			
Quantity (oz., gallons, pounds, etc)			
Chemical name:			
Contents:			
Building Location:			
Form (circle one): solid liquid gas solution			
Quantity (oz., gallons, pounds, etc)			
Chemical name:			
Contents:			
Signature of person filing this request:			
Signature of Department Chairperson:			
Signature of Principal:			