



**HAZARD COMMUNICATION PROGRAM
GLOBALLY HARMONIZING SYSTEM (GHS)
FOR
OAK GROVE SCHOOL DISTRICT**

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INTRODUCTION

To enhance our employees, students, visitors and contractors' health and safety, Oak Grove School District has developed, implemented, and maintains a hazard communication program as required by the Cal-OSHA Hazard Communication Regulation (T8CCR 5194). The written program is to establish guidelines and policies to ensure all members, students, and visitors of the Oak Grove School District are appraised of the chemical hazards to which they may be exposed and to provide knowledge so employees can make informed decisions about hazardous materials and / or their "Right to Know". The Hazard Communication Supervisors, Fred Dickey and Anthony Valdez, have full authority and responsibility for implementing and maintaining this program. Fred Dickey and Anthony Valdez, Managers of Maintenance, Operations and Transportation, will ensure information about the hazardous substances in our workplace, the associated hazards, and the control of these hazards through a comprehensive hazard communication program that includes the elements listed below.

RESPONSIBILITIES

Responsibilities for Management

The District's Managers of Maintenance, Operations and Transportation, Fred Dickey and Anthony Valdez, are responsible for developing and maintaining a written and effective Hazard Communication Program. All levels of management contribute to ensure that employees are aware of the safe operation/condition of their job assignment and work area. All Supervisors are responsible for maintaining a minimal-risk work environment in the areas under their control. The degree of effort and focus needed will vary depending on the nature of the work performed. While Supervisors may assign responsibility and delegate authority to others, they are accountable to higher administration for those preventable oversights and errors within their areas that result in injury, illness, or property damage affecting employees, students, visitors from the general public or District property.

Responsibilities for Employees

Oak Grove School District School District employees are responsible for ensuring their own Occupational Health and Safety and the safety of others by following District and department policies, procedures, and safe work practices. The employee also is responsible to follow the requirements of the written Hazard Communication Program.

This involves:

- Informing your supervisor of any personal health problems that may be exacerbated by any of the substances used by the department / site;
- Following the procedures covered in either the manufacturer's literature (SDS), warning labels, or in the Hazard Communication training provided;
- Leaving the area immediately if you believe the incident is beyond your immediate action;
- Reporting a spill or incident (including near misses) to your supervisor for appropriate action;
- Ensuring receipt of the proper materials needed to conform to procedures detailed in the Hazard Communication Training.

Responsibilities for Maintenance and Operations and Human Resources

Maintenance and Operations is responsible for the development and administration the District's written Hazard Communication Program. Human Resources will also provide technical support and resources for departments to ensure employees are appropriately protected from hazardous substances. Resources from Maintenance and Operations Department and Human Resources may include:

- Assisting supervisors in identifying hazardous substances present in the work area and evaluation potential hazards of operations;
- Assisting supervisors with employee training;
- Recommending appropriate engineering controls, administrative controls, and personal protective equipment (PPE).

Responsibilities for the District's Safety Committee

The District's Safety Committee will evaluate the District Hazard Communication Program annually to ensure that the program content is current and appropriate. The District Safety Committee members will also work closely with their respective Department Heads at each school site to ensure that their departmental Hazard Communications Program elements are current and appropriate.

LIST OF HAZARDOUS SUBSTANCES

Fred Dickey and Anthony Valdez will prepare and keep current an inventory list with the 3E Company of all known hazardous substances present in our workplace. Specific information on each noted hazardous substance can be obtained by reviewing the SDS online. This list will be updated annually or at the time that the inventory changes or new hazardous substances are introduced each Districts' site.

PROPOSITION 65 LIST OF CHEMICALS

Fred Dickey and Anthony Valdez are 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 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.

SAFETY DATA SHEETS (SDS)

Fred Dickey and Anthony Valdez are responsible for updating the SDSs, reviewing and maintaining the safety data sheet system for the District sites. The District maintains SDS through the 3E Company. Each site has authorized personnel that can access the SDSs. An employee may obtain a hardcopy also by contacting Fred Dickey, Manager of Maintenance and Operations. In the review of incoming data sheets, if new and significant health/safety information becomes available, this new information is passed on immediately to the affected employees by additional training sessions, posting of memos, and other means of communication. Legible SDS copies for all hazardous substances to which employees of this District may be exposed are available to each site. If SDSs are missing or new hazardous substance(s) in use do not have SDSs, or if an SDS is obviously incomplete, please contact Fred Dickey immediately and a new SDS will entered in the system. If we are unable to obtain the SDS from the vendor within 25 calendar days of the request, Fred Dickey will either call our local Cal/OSHA compliance office or write to:

Division of Occupational Safety and Health
Deputy Chief of Health and Engineering Services
1515 Clay Street, Room 1901
Oakland, CA 94612

If anyone has a specific question or needs additional information on an SDS, please call the Cal/OSHA Consultation Service at 1-800-963-9424 or the Fremont local branch at 510-794-2521. The District will make sure that employees have ready access to and know how to operate the online program for retrieval and printing of legible hard copies. Our backup system in the event of failure of the primary SDS retrieval system will require employees to request a hard copy SDSs by telephone. An SDS hard copy will be provided to the requester as soon as possible after the telephone request is made.

HOW TO REQUEST A SDS:

To request a safety data sheet (SDS), an authorized employee simply calls 1-800-451-8346 or mail the request to 3E Company. To ensure your request is quickly processed, it is extremely important to provide as much of the following product information as possible:

- Produce Name
- Manufacturer name
- Product number (found on side of container)
- UPC code (if available)

Please be as specific as possible when requesting SDS for a product. Separate SDS are maintained for products that have even very minor differences from others.

Please do not have unmarked bottles containing hazardous chemicals. Do not bring unauthorized chemicals from home.

LABELS AND OTHER FORMS OF WARNING

Before hazardous substance containers are released to the work area, it is the policy of our Oak Grove School District that Fred Dickey will verify that all primary and secondary containers are labeled as follows:

- Label Information Primary Container Secondary Container
- Identity of the hazardous substance(s)
- Applicable hazard warnings
- Name and address of the manufacturer

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, Fred Dickey 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, Fred Dickey will arrange for labels, signs, and other warnings to be printed in other languages.

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 by M&O staff 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:



A yellow rectangular label with a red border. At the top, it says "HAZARDOUS WASTE" in large red letters. Below that, it states "STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL." and provides instructions on what to do if found. The form includes fields for generator information: NAME, ADDRESS, CITY, STATE, PHONE, and ZIP. It also has fields for EPA IDENTIFICATION NO., MANIFEST TRACKING NO., EPA WASTE NO., CA WASTE NO., ACCUMULATION START DATE, and CONTENTS COMPOSITION. There are checkboxes for physical state (SOLID, LIQUID) and hazardous properties (CORROSIVE, REACTIVITY, FLAMMABLE, TOXIC). At the bottom, it says "D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX" and "HANDLE WITH CARE!"

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 Oak Grove 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 (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 labels:

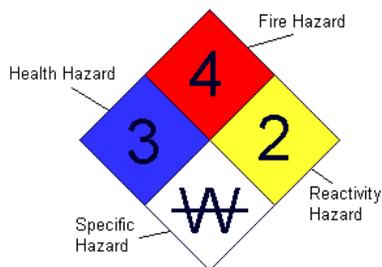


National Fire Protection Association (NFPA 704) diamond

The marking system, commonly found as signs, is intended to provide basic information to emergency personnel, so that they can better evaluate what fire fighting 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. The order of severity is indicated numerically by five division ranging from (4) for severe hazard to (0) which indicates no hazard.

This format is sometimes used for the Right-To-Know Labels, described above, but is currently being phased out.

An example of a NFPA label or sign with the numbering system:



EMPLOYEE INFORMATION, TRAINING AND DOCUMENTATION

Employees are to attend a health and safety training session set up by Fred Dickey prior to starting work. This training session will provide information on the following:

- The requirements of the hazard communication regulation, including the employees' rights under the regulation,
- The location and availability of the written hazard communication program,
- Any operation in their work area, including non-routine tasks, where hazardous substances or Proposition 65 carcinogens/reproductive toxins are present, if any, and exposures are likely to occur,
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area,
- Protective practices the District has taken to minimize or prevent exposure to these substances,
- How to read labels and review SDS's (formally called MSDS's), to obtain hazard information,
- Physical and health effects of the hazardous substances,
- Symptoms of overexposure,
- Measures employees need to put into practice to reduce or prevent exposure to these hazardous substances by engineering controls, work practices, and use of personal protective equipment,
- Emergency and first-aid procedures to follow if employees are exposed to hazardous substances,

- The location and interpretation, if needed, of warning signs or placards to communicate that a chemical known to cause cancer or reproductive toxicity is used in the workplace, if applicable to the school site.

Employees will receive additional training when a new hazard is introduced into the workplace or whenever employees might be exposed to hazards at another employer's work site.

Many Cal-OSHA standards and regulations contain requirements for retention of records for hazardous chemicals maintained on school sites, and the training of the employees. To comply with these regulations, as well as to demonstrate that the critical elements of this Hazard Communication Program are being implemented, the records shall be maintained and retained for at least 5 years. The District will ensure that these records are kept in the files, and present them to Cal-OSHA or other regulatory agency representatives if requested. A review of these records will be conducted by the Superintendent and/or designee or the District's Safety Committee during routine inspections, to measure compliance with the Program.

HAZARDOUS NON-ROUTINE TASKS

Periodically, our employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees will be given information by their supervisor on hazards to which they may be exposed during such an activity.

This information will cover:

- Specific hazards,
- Measures the company has taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program, and establishing emergency procedures,
- Required protective/safety measures.

LABELED / UNLABELED PIPES

Above-ground pipes transporting hazardous substances (gases, vapors, liquids, semi-liquids, or plastics) shall be identified in accordance with T8 CCR, Section 3321, "Identification of Piping."

If non-labeled pipes are discovered, the Maintenance & Operation Department must be contacted. The type and purpose of the pipe will be determined, the hazard assessed, and the pipe labeled. No work should be performed on an unlabeled pipe.

Above-ground pipes that do not contain hazardous substances but may have associated hazards if disturbed or cut (e.g., steam lines, hot water lines) shall be addressed as follows:

Before employees enter the area and initiate work, (persons/position) will inform them of:

- The location of the pipe or piping system or other known safety hazard
- The substance in the pipe
- Potential hazards
- Safety precautions

INFORMING CONTRACTORS

To ensure that outside contractors work safely in our plant and to protect our employees from chemicals used by outside contractors, (person/position/department) is responsible for giving and receiving the following information from contractors:

- Hazardous substances, including Proposition 65 chemicals, to which they may be exposed while on the job site as well as substances they will be bringing into the workplace To this end, we will provide contractors with information on our labeling system and access to SDSs.
- Precautions and protective measures the contract employees may take to minimize the possibility of exposure.

GLOBALY HARMONIZING SYSTEMS (GHS)

Federal OSHA's Hazard Communication Standard was revised in 2012 to align with the United Nations' Globally Harmonized System (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 are 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:** Now has a specified 16-section format.
- **Information and training:** Oak Grove School District trained 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 Hazard Communication Standard (HCS): Effective Completion 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
Transition Period to the effective completion dates noted above	Transition Period to the effective completion dates noted above	Transition Period to the effective completion dates noted above

For more information on the GHS of Classification and Labeling of Chemicals, OSHA can provide the following reference documents:

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>

SIGNATORY PAGE

If anyone has questions about this Hazard Communication plan, please contact Fred Dickey, Manager of Maintenance and Operations, to ensure that the policies are carried out and the plan is effective. This plan will be reviewed annually for updates and / or changes.

Approved by Oak Grove School District Safety Committee on April, 2014.

The plan was reviewed and updated August 2015, December 2016 and August 2017.