April 23, 2015

MEMORAMDUM FOR:

JPA Liaisons/Safety Officers/Contact People/Servicing Agents

SUBJECT:

Globally Harmonized System-GHS

OSHA has guidelines that regulate the labels affixed to chemical products (cleaning materials, etc.) and the accompanying safety data sheets. These safety data sheets are prepared by the chemical manufacturers and OSHA has guidelines regarding accessibility to employees. The first attachment has been provided by MSDS Online. That firm assists districts with keeping files up to date and providing accessibility to employees and the firm has also provided quotes to render the services for each district. Our JPA's representative's name is Courtney Falls and her contact information is provided at the bottom of the first page.

The second attachment is a template to address the OSHA requirement that each district maintain a hazard communication plan (HAZ Com).

HAZ Com training is available at getsafetytrained.com, a 25 minute program titled Hazard Communication/GHS. The third attachment is the first page of that online class.

If you have any questions please contact Courtney or me.

Henry Brock
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MSDSonline®
EH&S Compliance Made Simple

Reduce Risks, Improve Efficiencies & Drive Compliance

Why GHS/HazCom Compliance is Important

OSHA's Hazard Communication Standard (HazCom) underwent the biggest revision in its decades-long history when it aligned with the United Nations' Globally Harmonized System (GHS). This alignment has brought about major changes to several areas of the standard, affecting the compliance requirements for safety data sheets, labels and employee training.

HazCom Ranks #2 on OSHA's Top 10 Violation List

Since 2009, OSHA has issued more than 37,000 HazCom violations, and the standard continues to rank #2 on the Agency's annual top 10 most frequently cited standards list.

With more workplaces landing under OSHA's inspection microscope and two of the Agency's important GHS deadlines hitting during 2015, employers should act fast to ensure their HazCom Programs are compliant and GHS-ready.

How MSDSonline Serves the Education Industry

MSDSonline helps educational communities with several of their biggest challenges, like tracking chemicals across facilities and storage locations, and providing critical safety information to workers in their work areas during their work shifts.

From teaching staff at grade schools to maintenance crews at universities, no matter the educational community group or size, MSDSonline has a solution to eliminate the time-consuming, manual administrative tasks associated with hazardous chemical management, providing schools across the country with greater control over their hazardous chemical inventories.

MSDSonline Voted as Safety Professionals' Top Pick for MSDS/Chemical Management at ASSE Safety 2014 Conference

Key Features:

- Unlimited access to the industry-leading database of safety data sheets
- Automatic SDS updates
- Multiple OSHA-compliant SDS library back-up options
- Right-to-know SDS access across technologies — laptops, tablets and mobile devices
- GHS-styled workplace labels
- GHS / HazCom training for employees
- Robust suite of tools for identifying, tracking, reporting, mapping and managing location-specific, container-level chemical inventory information

FRESNO COUNTY SELF INSURANCE GROUP

OSS ORGANIZATION OF SELF-INSURED SCHOOLS

How to Get Started

FCSIG and OSS have partnered with MSDSonline to offer an MSDS/chemical management solution at an affordable price. For more information on how to enroll and preferred pricing, **please contact Courtney Falls at 1.312.881.2148 or cfalls@MSDSonline.com.**

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Chapters

Training Record

What is Hazard Communication (HAZCOM)?

Every day at many workplaces, employees are exposed to hazardous substances while working with them. Other workers may be incidentally exposed to the same chemicals, yet not use them as a part of their jobs. Many of these chemicals can harm their health or cause safety hazards. For many years, workers used chemicals for various reasons but did not know much about them. There were no rules or regulations to protect workers, and as a result, many became sick or even died from chemical exposure or accidents. As worker health and safety rules and regulations were enacted, a need to protect employees who worked with and around chemicals was identified.

When the hazard communication standard was first adopted in 1983, it was known as the "Right-to-Know Law" because it ensured that hazard information about workplace chemicals was always available to employees. The standard was enacted to enable them to learn about chemical hazards in the workplace and how to work safely with these materials. It also required employers to prepare a list of all hazardous

Hazard Communication Program

TEMPLATE

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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 (SDS) 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.

This document constitutes the written Hazard Communication Program for INSERT ORGANIZATION. This program is available, upon request, to employees, their designated representatives, and any other entity as required by State and Federal regulations as noted below. This plan, in conjunction with an employee training program are important tools in providing information concerning hazardous substances used at all locations.

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 that 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. ENVIRONMENTAL, HEALTH & SAFETY SPECIALIST (OR APPLICABLE TITLE)

At least semi annually, INSERT TITLE will do an audit to ensure each location's use, storage and disposal of hazardous substances is completed in accordance with the guidelines set forth in this document and the regulations.

IV. EMPLOYEE INFORMATION AND TRAINING

All employees who use, or who may be exposed to, hazardous substances are required to attend training at least once per year on the Hazard Communication regulations. Training is required of new employees prior to their commencing work with hazardous substances. Training for employees shall consist of at least the following:

a) Informing employees of the requirements in this program, and the location of the written Hazard Communication Plan.
b) Informing employees of any operations at their site where hazardous substances are present.
c) 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.).
d) 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 implemented to protect employees from exposure to hazardous substances, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
e) Informing employees of the container labeling system, safety data sheets (SDS), and how employees can obtain and use the appropriate hazard information.
f) 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 for personal physicians or collective bargaining agents to receive information regarding hazardous substances to which the employee may be exposed according to provisions of this section;
    c. 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.
g) Whenever the company receives new or revised information related to hazardous substances in the workplace, the information will be provided to the employees. If new information indicates significantly increased risks to, or additional measures necessary to protect employee's health, the INSERT TITLE shall review the substances to ensure they are appropriate and necessary for conducting work.
h) 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 company's policies.
i)

V. LABELS AND OTHER FORMS OF WARNINGS

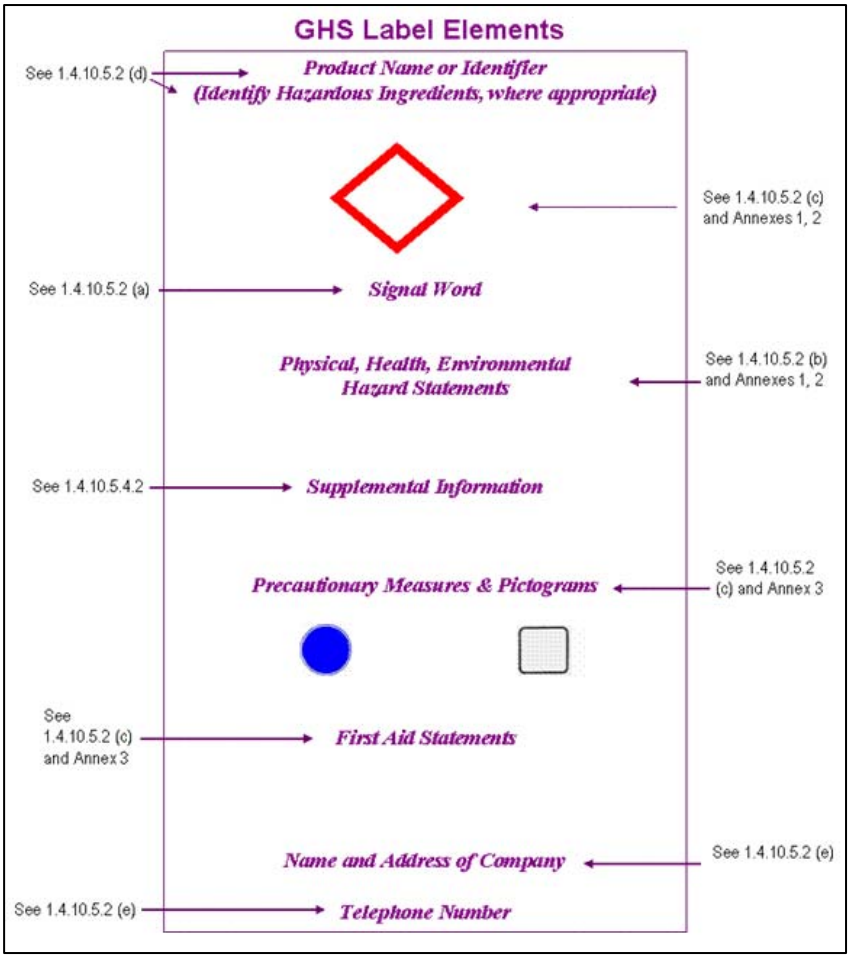
Any container in the work place that holds a hazardous substance is required to have a proper identification label. Any container into which a hazardous substance has been transferred from a properly labeled container must also bear the appropriate label. Employees should not use substances from unlabeled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

1. Identity of the hazardous substance(s)
2. Manufacturer's or supplier's name and address
3. A list of the hazardous ingredients
4. The appropriate hazard warnings

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

1. Identify the hazardous substance(s) (Name)
2. Appropriate hazard warnings

Container labeling, in compliance with Global Harmonization requirements, will include the elements seen here



The following is a list of Global Harmonization approved pictograms that will be included in the container labels noted on page 5.

GHS Pictograms and Hazard Classes		
		
▪ Oxidizers	▪ Flammables ▪ Self Reactives ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Organic Peroxides	▪ Explosives ▪ Self Reactives ▪ Organic Peroxides
		
▪ Acute toxicity (severe)	▪ Corrosives	▪ Gases Under Pressure
		
▪ Carcinogen ▪ Respiratory Sensitizer ▪ Reproductive Toxicity ▪ Target Organ Toxicity ▪ Mutagenicity ▪ Aspiration Toxicity	▪ Environmental Toxicity	▪ Irritant ▪ Dermal Sensitizer ▪ Acute toxicity (harmful) ▪ Narcotic Effects ▪ Respiratory Tract ▪ Irritation

Department managers 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. Example: 2 aspirins may relieve a headache, the whole bottle would be toxic to your body and do harm. Keep in mind, amount of a chemical and length of time you are exposed is very important to consider.

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 MSDS's 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
    a. Not following safety procedures
    b. Not using proper personal protective equipment
C. Failure or misuse of personal protective 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 INVENTORY

An inventory of the hazardous substances known to be used at each site must be developed and kept current. A copy of the most current inventory list for each site can be found in the areas where the hazardous substance are in use and stores, the M & O office, and at the District office.

Specific chemical or hazardous substance information is contained in the Safety Data Sheet (SDS), formerly known as the Material Safety Data Sheet. The SDS must be kept in a readily accessible location to the employee's work area. Supervisors will ensure that employees are aware of the location of the SDS binder and of any new or updated SDS received by his/her department. The supervisor will review any new or updated SDS with affected employees when they are received. If an employee is unable to locate the appropriate SDS, he/she is to immediately notify their supervisor so that one may be obtained as soon as possible.

VIII. PERSONAL PROTECTIVE EQUIPMENT

Employees using hazardous substances should review the respective SDS 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 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 preparatory 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 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 SDS for each hazardous substance at the site.

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 department supervisor should provide the following information to the Purchasing Department: 1) a written statement demonstrating an overwhelming need for that substance; and 2) 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, SDS, and other standards of practice. Hazardous substances should be handled only with proper protective equipment and only under the proper conditions.

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 Dean (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.

Carcinogens, radioactive materials and biological materials that are subject to reporting and/or permitting must be properly labeled, inventoried and stored as required. All carcinogens must be properly reported and all handling and storage shall comply with Cal-OSHA regulations pertaining to such. Radioactive and biological materials shall be stored separately and labeled as required. Qualified staff and students who have been

properly trained in their hazards shall handle all such materials. Documented training for all such staff and students shall be completed prior to their use and handling and shall be kept in department files for verification.

XI. DISPOSAL PROCEDURES FOR HAZARDOUS SUBSTANCES

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 INSERT TITLE in writing that such removal is necessary and include an inventory of those items designated for removal. The request for removal shall be forwarded to the INSERT TITLE along with a copy of the inventory identifying those materials to be removed along with their quantity, location and their condition.

The INSERT TITLE shall contract with a State Certified hazardous waste contractor to properly collect, package and remove for disposal the hazardous wastes identified for such removal. The manifest of such wastes shall be signed by the District EHS Specialist with a copy of the manifest retained at the site for record keeping. It is the responsibility of the INSERT TITLE to keep all manifest and other documents related to any waste removal from their site in an easily accessible file.

XII. NON-ROUTINE TASKS

Department supervisors 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 company, the INSERT TITLE will notify outside contractors whether they may be exposed to any hazardous substances and where the SDS binders are kept for the areas in which they are working. In addition, outside contractors must provide a list and SDS for any hazardous substances they will be using at company facilities to complete their work obligations. The outside contractor is responsible for having trained their employees in understanding SDS, 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.