

HAZARD COMMUNICATION PROGRAM



San Luis Obispo County Office of Education
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(805) 543-7732
<https://www.slocoe.org/contact-slocoe/>

San Luis Obispo County Office of Education

I. DISTRICT POLICY

The following hazard communication program has been implemented to ensure that information about the dangers of all hazardous chemicals used by the San Luis Obispo County Office of Education (SLOCOE) is known by all affected workers. As required by California's Hazard Communication (HazCom) Regulation (T8 CCR 5194), under this program, workers will be informed of the requirements of the Cal/OSHA Hazard Communication Standard, the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and safety data sheets (SDSs).

This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available on the District's webpage, under the [Operational Services Resources](#) for review by any interested worker.

Hugo Bastidos, District Safety Coordinator, is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

II. LABELS AND OTHER FORMS OF WARNING

The District Safety Coordinator or designated person at each site will verify that all containers received for use will be clearly labeled in accord with the requirements of HazCom 2012, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier's name and address.

The District Safety Coordinator or designated person at each work area will ensure that all secondary containers are labeled with the original supplier's label or with an alternative workplace label. For help with labeling, see Hugo Bastidos, District Safety Coordinator.

NOTE: Employers may choose to label workplace containers either with the same label required for shipped containers of chemicals or use their own label they create if it provides the employee with the general information about the hazards of the chemical and the District trains those employees who would be exposed to the chemical to understand the hazards it presents.

On the following individual stationary process containers, we are using labels and placards to convey the required information:

- 55 gallon barrels or drums (oil, waste oil, hydraulic fluid, aerosol cans, or antifreeze)
- Cubic yard boxes (waste paint cans, fluorescent light bulbs)
- Tanks or cylinders (pressurized fuels or oxygen)

SLOCOE is using a system provided by our environmental compliance vendor(s).

Hugo Bastidos, District Safety Coordinator and/or MOT Manager will review the District's labeling in house procedures every quarterly and then once a year with local fire department and/or county inspections, updating labels and storage containers as required.

III. SAFETY DATA SHEET (SDS)

Hugo Bastidos, District Safety Coordinator, and/or the designated person(s) is responsible for establishing and monitoring the District SDS program. The procedure below will be followed when an SDS is not received at the time of initial shipment:

Copies of SDSs for all hazardous chemicals to which workers are exposed or are potentially exposed will be kept in the MOT office or Operations building. Workers can access SDSs by going to the MOT office at 3420 Watson Dr., San Luis Obispo, CA 93405. SDSs will be readily available to all workers for their work area during each work shift. If an SDS is not available, contact Nelson Payton – Operations Manager at 805-785-7532. When revised SDSs are received, the following procedures will be followed to replace old SDSs:

Should an SDS not be received with or prior to receipt of the initial shipment of a hazardous chemical or with the first shipment after a safety data sheet is updated, an SDS will be requested as soon as possible from the manufacturer or distributor. If the SDS(s) is still not provided upon request, the manufacturer or distributor will, within seven days of noting this missing information, be requested in writing to provide the required information. Hugo Bastidos, district safety coordinator or the identified designee for the current school year, will forward a copy of this written request to Cal/OSHA if a response is not received from the manufacturer or distributor within 25 days.

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

If a new or revised SDS is received that indicates significantly increased risks or measures needed to protect employee health, that information will be conveyed to employees within 30 days by email.

If we become aware of any significant information regarding the hazards of a chemical or ways to protect against the hazards, this new information will be added to the SDS within three months.

Hugo Bastidos, district safety coordinator or the identified designee for the current school year, is responsible for reviewing the SDSs received for safety and health implications and initiating any needed changes in workplace practices.

If we become aware of any significant information regarding the hazards of a chemical or ways to protect against the hazards, this new information will be added to the SDS within three months.

Legible SDS copies for all hazardous chemicals to which employees of this company may be exposed are kept and always available on our website at [Operation Services Resources](#) under [Safety Data Sheets](#) and are readily available for review by all employees in their work site and during each work shift without the need to ask someone.

Should any of our employees work at more than one geographical location or hard copies are needed due to electronic failure, the SDSs will be kept in the office at every SLOCOE site, and should be available to you day or night.

Employees are to contact Hugo Bastidos, district safety coordinator or the identified designee for the current school year, if they have a specific question or need additional information on an SDS.

SDSs (and the older Material Safety Data Sheets) constitute an "employee exposure and medical record" and will be kept according to T8CCR section 3204 requirements. A master copy of all MSDS and SDS sheets for products

currently used and use will be kept at our MOT Operations building for anyone to review at any time.

IV. EMPLOYEE INFORMATION AND TRAINING

The District Safety Coordinator and Operations Manager, is responsible for employee information and training.

Every worker who will be potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication standard and this program before starting work.

The training program for new workers is as follows:

- New Employee onboarding. All employees as part of their new hire onboarding process go through an extensive list of online training modules that pertain to their specific work duties by department / discipline they are assigned to using the GetSafetyTrained.com website.
- Monthly building (hybrid) meetings
- Individual site in person meetings
- Electronic distribution of SIPE provide material to all employees
- Video recording availabilities of "how to"
- All methods of facilitation will have a "Q&A" time provision. The SLOCOE website allows for safety concerns, suggestions, and questions to be made via an online submission that directs the email to the district safety coordinator for response.

Prior to introducing a new chemical hazard into any work area, each worker in that work area will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:

- Individual in person instruction of use in a safe and appropriate manner
 - In person refresher of use upon return to work
 - Annual review of proper use and storage of chemicals
 - Electronic and paper distribution of SDS
 - Online SLOCOE website SDS availability
 - Online training video
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- The requirements of the Hazard Communication regulation, including the employees' rights under the regulation
 - The location and availability of the written HazCom Program and list of hazardous chemicals and SDSs and how this information will be addressed when there are other employer activities at the worksite
 - Any operation in the employees' work area, including non-routine tasks, where hazardous chemicals or Proposition 65 carcinogens/reproductive toxins are present, and exposures are likely to occur
 - Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area
 - Protective practices the company has taken to minimize or prevent exposure to these substances
 - The details of the District's HazCom Program, including how to read labels and review SDSs to obtain hazard information, and an overview of our workplace-specific labeling procedures for original and workplace containers, as well as stationary processes
 - Physical and health effects of the hazardous chemicals either individually or as hazard groups. Chemical-specific information will always be available through labels and safety data sheets
 - Symptoms of overexposure
 - Measures employees need to put into practice to reduce or prevent exposure to these hazardous chemicals by engineering controls, work practices, and use of personal protective equipment
 - Emergency and first aid procedures to follow if employees are exposed to hazardous chemicals

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

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

V. HAZARDS OF NON-ROUTINE TASKS

Periodically, workers are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: High dusting and cleaning in the gym that requires an aerial lift. Prior to starting work on such projects, each affected worker will be given information by a direct supervisor, about the hazardous chemicals they may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the worker should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another worker (buddy systems), and emergency procedures.

VI. INFORMING OTHER EMPLOYERS/CONTRACTORS

It is the responsibility of the District Safety Coordinator and/or MOT Manager to provide other employers and contractors with information about hazardous chemicals that their workers may be exposed to on this work site and suggested precautions for workers. It is the responsibility of the District Safety Coordinator and/or MOT Manager to obtain information about hazardous chemicals used by other employers to which our workers may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by this District's operations in the following manner:

An email will be sent to the contractor, as well as a hard copy of the hazardous chemicals SDS sheets will be provided to the project foreman or supervisor in the field prior to the start of work.

In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect workers exposed to operations performed by this District.

Also, other employers will be informed of the hazard labels used by the District. If alternative workplace labeling systems are used, the other employers will be provided with information to understand the labels used for hazardous chemicals to which their workers may have exposure.

VII. LIST OF HAZARDOUS CHEMICALS

The District Safety Coordinator and/or MOT Manager for the current school year, will prepare and keep current a list of all known hazardous chemicals present in the workplace that are in use or storage (see attached *Hazardous Chemical List*) and, at the same time, verify the use of the most current safety data sheets (SDSs). The product identifiers listed will match those on the corresponding container labels and SDSs. Specific information on each noted hazardous chemical can be obtained by reviewing the corresponding label and SDS at [Operation Services Resources](#) under [Safety Data Sheets](#).

Proposition 65 List of Chemicals

The District Safety Coordinator and/or MOT Manager for the current school year, is responsible for obtaining updates of Prop 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Prop 65 list, the additional warning requirements will take effect within 12 months from the listing date.

When new chemicals are received, this list is updated within 30 days of introduction into the workplace. To ensure that any new chemical is added in a timely manner, the following procedures shall be followed:

All sites will be notified in writing via email anytime a new product is added to our inventory, or anytime that the District discontinues the use of a product. Additionally, a hard copy will be sent to each site and have the site custodian to insert into the master copy that is kept at each site in their 3 ring binder where it is easily accessible to all employees. For any discontinued products we will make a note that this product is discontinued, but we will keep the paperwork for that product with our records for a period of time up to 30 years.

VIII. CHEMICALS IN UNLABELED PIPES

Above-ground pipes transporting hazardous chemicals (gasses, vapors, liquids, semi-liquids, and plastics) will be identified in accordance with T8 CCR, section 3321, "Identification of Piping."

The SLOCOE does not have any pipes transporting hazardous chemicals except for one exception of natural gas. The natural gas pipelines are all labeled as they enter a building, at every turn and transition, as well as at their destination. They are also maintained and serviced by licensed transporters/vendors.

Before employees enter the area and initiate work on or near pipes, the District Safety Coordinator and/or MOT Manager will inform staff and site of:

- The location of the pipe or piping system or other known safety hazards
- The chemical(s) in the pipe
- Potential hazards
- Safety precaution

IX. PROGRAM AVAILABILITY

A copy of this program will be made available, upon request, to workers, their designated representatives, and Cal/OSHA.

HAZARD COMMUNICATION PROGRAM

Appendices:

- A. ADDITIONAL RESOURCES/DOCUMENT LINKS
- B. SAMPLE HAZARDOUS CHEMICALS LIST
- C. SAMPLE EMPLOYEE TRAINING ROSTER TEMPLATE
- D. SAMPLE TRAINING TOPICS

APPENDIX A

Additional Resources:

- The Cal/OSHA Hazard Communication Regulation – a Guide for Employers That Use Hazardous Chemicals
 - https://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf
- Centers for Disease Control (CDC) Hazard Communication for Disinfectants Used Against Viruses
 - https://www.cdc.gov/niosh/topics/disinfectant/default.html#anchor_1592574554029
- Cal/OSHA Title 8 Regulations – Hazard Communication
 - <https://www.dir.ca.gov/title8/5194.html>
- OSHA Fact Sheet – Steps to an Effective Hazard Communication Program for Employers That Use Hazardous Chemicals
 - <https://www.osha.gov/sites/default/files/publications/OSHA3696.pdf>

APPENDIX C

Sample Hazard Communication Training Roster

San Luis Obispo County Office of Education

TOPIC: _____ DATE(S): _____

LOCATION: _____ INSTRUCTOR: _____

LENGTH OF CLASS _____ HRS. _____ Initial _____ Refresher

TRAINING CLASS SIGN-IN

	NAME-PRINTED	SIGNATURE	DEPARTMENT/SITE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

APPENDIX D

Topics

- Requirements of the hazard communication regulation, including the employee's rights under the regulation
- Any operation in the work area, including non-routine tasks, where hazardous substances or Proposition 65 carcinogens are present, and exposures are likely to occur
- Location and availability of the written Hazard Communication Program, including the list of hazardous chemicals and safety data sheets
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area
- The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from exposure to hazardous chemicals
- Emergency procedures, including location and proper use of first aid, in the event of exposure to hazardous substances
- Details of the Hazard Communication Program, including an explanation of the labels received on shipped containers and the workplace labeling system, safety data sheets, and how employees can obtain and use the appropriate hazard information

- SIPE Get Safety Trained Modules:

<https://www.getsaftytrained.com>

- Applicable OSHA online trainings:

https://www.osha.gov/sites/default/files/training-library_industrial_hygiene.pdf

https://www.osha.gov/sites/default/files/training-library_TrngandMatlsLib_FlammableLiquids.pdf

[Free OSHA Training Tutorial - Understanding GHS Safety Data Sheets \(SDS's\)](#)