

Best Practices for an Effective Hazard Communication Program

“Your Right to Know”



in partnership with



Today's presenters



Scott Baur

Senior Environmental Health and Safety Solutions Engineer
3E Company



Silvia Kusel

Senior Regional Account Representative
3E Company

Agenda

- Review of California's Right-To-Know Law
- Typical Responsibilities
- Implementing the Right-to Know Law
- Other State of CA's Applicable Regulations
- Conclusion
- Q&A

Introduction

California's Right-To-Know Law



- 1983, Standard was enacted
- The Standard, more commonly known as California's Right-To-Know Law, was revised in 1985 to include several provisions of the Federal Hazard Communication Standard
- Revised again in 2013 to conform to the UN's globally harmonized systems (GHS)of classification and labeling of chemicals

Introduction

California's Right-To-Know Law

Main Objectives of GHS:

- Provide an international approach to hazard communication.
- Provide a standardized approach to labeling and safety data sheets.
- Is based on major systems around the world.



Introduction

California's Right-To-Know Law

The major changes as a result of GHS:

- Hazard Classification: The definitions of hazards
- Labels: Signal words, pictograms , statements
- Safety Data Sheets (SDS)



Typical Responsibilities

Districts' EHS Teams

1. Ensure chemical inventories are in place
2. Verify product label information
3. Review Safety Data Sheets (SDS) for health and safety information
4. Provide access to SDS
5. Substitutes chemical products with less toxic whenever possible



Typical Responsibilities

District's



- Districts that have multiple workplaces to which employees travel must keep SDSs at a primary central location and must establish a mechanism to ensure that employees can immediately obtain the required information in an emergency.

Typical Responsibilities

School /Sites

- Maintain an updated inventories of all chemicals on site!
- Provide and maintain access to SDS
- Prohibit use of products not listed on District's approved list
- Notify in the event of a hazardous chemical spill
- Provide training to employees at the time of hire, annually thereafter, and upon introduction of new chemical products

Violations

OSHA's Most Frequent

#3. Hazard Communication



OSHA's 2011 TOP TEN Most Frequently Cited Violations

- | | |
|---------------------------|------------------------------|
| 1. Scaffolding (C) | 6. Electrical: wiring |
| 2. Fall Protection (C) | 7. Powered industrial trucks |
| 3. Hazard communication | 8. Ladders (C) |
| 4. Respiratory protection | 9. Electrical systems design |
| 5. Lockout/tagout | 10. Machine guarding |

C = Construction standard



IMPLEMENTING THE RIGHT-TO-KNOW

Steps 1

- Revive your current written program, plans and policies.
- Designate or review current staff member(s) who are responsible for implementing and monitoring the program.
- For junior and senior high schools, and occupational centers, designating a “Chemical Safety Coordinator” might be an option to fulfill the responsible staff member roles and responsibilities.

IMPLEMENTING THE RIGHT-TO-KNOW

Step 2

- Annually update the chemical inventory list of all hazardous substance(s) to which employees may be exposed. Use this list to maintain or obtain access to all Safety Data Sheets (SDS) for your location.
- Use this list to access to all Safety Data Sheets (SDS) for your location.

IMPLEMENTING THE RIGHT-TO-KNOW

Example - Chemical Inventory List

Location	Product Name	Manufacturer Name	Part #
Grover Cleveland High School	Vandalism Mark & Stain Remover	Claire Manufacturing Company	1955449
Grover Cleveland High School	Vandalism Mark & Stain Remover	Claire-Sprayway Incorporated	1005820
Grover Cleveland High School	Champion Multi-Purpose Insect & Lice Killer	Chase Products Company	
Grover Cleveland High School	Concrete Cleaner Pine	Brody Chemical	
Grover Cleveland High School	Rid Lice Control Spray Bulk	Bayer Corporation - Consumer Care Division	
Grover Cleveland High School	Vandex Vandal Mark Remover	Claire-Sprayway Incorporated	
Grover Cleveland High School	Gojo Supro Max Cherry Hand Cleaner	GOJO Industries, Inc.	

IMPLEMENTING THE RIGHT-TO-KNOW

Step 3

- Option 1 - Collect all SDS for each hazardous substance used in the school's work location.
- Option 2 - Use the CSBA SDS on-demand or the SDS web hosted portal to access SDS.
- If necessary download and print SDS

IMPLEMENTING THE RIGHT-TO-KNOW

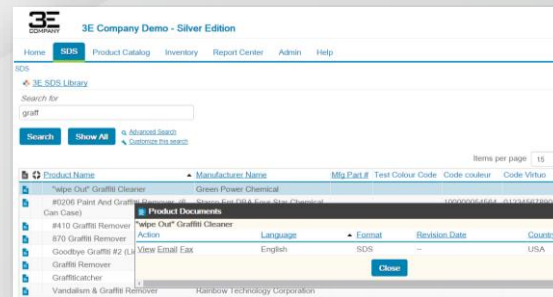
SDS Management Options



Binders



On Demand



On Line

IMPLEMENTING THE RIGHT-TO-KNOW

Step 4

- Read all original and secondary containers to ensure they are properly labeled according to Title 8, California Code of Regulations, Section 5194
- Review your existing written Hazard Communication Program
- Discuss the components of this program with all participating employees

IMPLEMENTING THE RIGHT-TO-KNOW

Step 5

Develop a plan for updating the program to ensure that:

- New employees are trained.
- New chemicals are delivered with the proper labeling and accompanied with the appropriate SDS.
- Current employees are retrained when new hazardous materials are used and/or new processes are employed.

SUMMARY OF CA's RIGHT-TO-KNOW LAW

Who?

The Law applies to all District employees who may be exposed to hazardous substances.

Manufacturers and importers are required to determine the physical and health hazards associated with the substances they produce or repackage.

SUMMARY OF CA's RIGHT-TO-KNOW LAW

What?

Information must be sent to the District in the form of labels and Safety Data Sheets.

What's Exempt?

Any hazardous waste	Consumer products
Tobacco products	Foods, drugs and cosmetics
Natural wood or chemically untreated wood products for retail sale	Pesticides use regulated by the California D of F&A
Manufactured articles that are handled/ processed in a way that does not results in employee exposure	

SUMMARY OF CA's RIGHT-TO-KNOW LAW

Where?

- Art Department
- Technology Department – Audio Visual
- Science Department
- Family & Consumer Science
- Graphics / Photography
- Agricultural
- Industrial Technologies
- Nutrition (Food Services)
- Music
- Transportation



SUMMARY OF CA's RIGHT-TO-KNOW LAW

Where?

- Nutrition / Food Services
- Facilities Mgmt:
 - Building Trades
 - Custodial Services
 - Grounds Department
 - Mechanical Systems



SUMMARY OF CA's RIGHT-TO-KNOW LAW

When - Notifications

- CA law requires Districts to notify employees of any potential exposure or actual exposure to a hazardous substance
- Notification is also accomplished through training and employee access to SDSs.

SUMMARY OF CA's RIGHT-TO-KNOW LAW

How?

- Safety Data Sheets (SDS) provide detailed health and safety information and precautions for handling hazardous substances, including emergency and first aid procedures.
- Provide training to employees on the Hazard Communication Standard at the time of hire, annually thereafter, and upon introduction of new chemical products.

SUMMARY OF CA's RIGHT-TO-KNOW LAW

How?...Labels

The Basic Parts of A GHS-Compliant Label

1 → **n-Propyl Alcohol**

UN No. 1274
CAS No. 71-23-8

2 → **DANGER**

3 → Highly flammable liquid and vapor. Causes serious eye damage. May cause drowsiness and dizziness.

4 → Keep away from heat/sparks/open flames/hot surfaces. No smoking. Avoid breathing fumes/mist/vapours/spray. Wear protective gloves/protective clothing/eye protection/face protection. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present. Continue rinsing.

Fill Weight: 18.65 lbs. Lot Number: B56754434
Gross Weight: 20 lbs. Fill Date: 6/21/2013
Expiration Date: 6/21/2020

5 → Acme Chemical Company - 711 Roadrunner St. - Chicago, IL 60601 USA - www.acmechem.com - 123-444-5567

See SDS for further information.

6 →

1. **Product Identifier** - Should match the product identifier on the Safety Data Sheet.
2. **Signal Word** - Either use "Danger" (severe) or "Warning" (less severe)
3. **Hazard Statements** - A phrase assigned to a hazard class that describes the nature of the product's hazards
4. **Precautionary Statements** - Describes recommended measures to minimize or prevent adverse effects resulting from exposure.
5. **Supplier Identification** - The name, address and telephone number of the manufacturer or supplier.
6. **Pictograms** - Graphical symbols intended to convey specific hazard information visually.

SUMMARY OF CA's RIGHT-TO-KNOW LAW

The How?

Districts are Exempt - Compliance with Proposition 65 Warnings or The Safe Drinking Water and Toxic Enforcement Act of 1986.



applies to all businesses except:

- Companies employing fewer than ten employees
- Any government agency
- All public water systems

Other State of CA's "RTK" Type Regulations

Children's Health - California Education Code

- Section 32064 prohibits schools from ordering or purchasing any product that contains toxic or carcinogenic substances -K-6.
- The law also restricts the purchase of such products in 7-12, allowing the use only if the product bears a label informing the user of the presence of hazardous ingredients, the potential health effects, and instructions for the safe use...

Other State of CA's Applicable Regulations

Children's Health - California Education Code

LIST OF ART AND CRAFT MATERIALS
THAT CANNOT BE PURCHASED FOR USE IN GRADES K-6

Page 2

Products are listed under seven categories presented as headings with definitions. The manufacturer, the product name, and the **source** of the listing are identified, as follows:

- 1--The Art & Creative Materials Institute, Inc., Certified Products List: products identified as bearing the Cautionary Labeling ("CL"), dated July 4, 2014, www.acminet.org
- 2--Product recalls, Consumer Product Safety Commission (as of July 24, 2014);
- 3--Products brought to OEHHA's attention as bearing hazard labels.

Adhesives <i>Substances applied to a surface to bind materials together, such as glue, rubber cement, plastic cement, or spray adhesives.</i>		
C2F, Inc.	ProArt Rubber Cement	1
Chartpak	Grumbacher Repositionable Adhesive (Aerosol)	1
DESIGN MASTER Color Tool, Inc.	Glue for Glitter (Aerosol)	1
DESIGN MASTER Color Tool, Inc.	Tack 1000 Spray Adhesive (Aerosol)	1
DESIGN MASTER Color Tool, Inc.	Tack 2000 Spray Adhesive (Aerosol)	1
Elmer's Products, Inc	Elmer's Board Mate Rubber Cement	1

Other State of CA's Applicable Regulations

Chemical Hygiene Plans

Science Departments:

A Chemical Hygiene Plan (CHP) is a written report summarizing all your safety regulations, proper laboratory procedures for handling hazardous chemicals, and training procedures.

Other State of CA's Applicable Regulations

Chemical Hygiene Plans

Should include:

- General laboratory rules and procedures
- Personal protective equipment requirements
- Spill and accident procedures
- Chemical storage rules and procedures
- Safety equipment requirements and inspection procedures
- Employee safety training
- Exposure and medical evaluations
- Emergency evacuation plan

Conclusion

The SIX Major Requirements

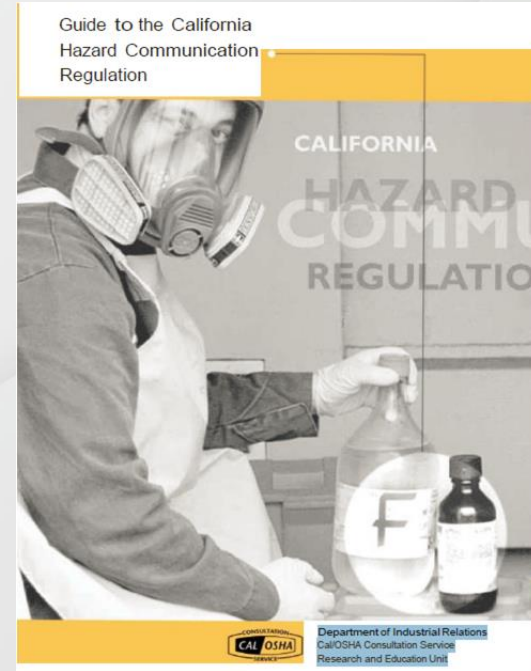
1. Have or take an inventory (develop a list of hazards)
2. Have access to or acquire, update, and maintain Safety Data Sheets
3. Label all chemicals properly
4. Train
5. Develop or Update Your Written Plan
6. Develop or Update your Chemical Hygiene Plan in Your Labs



References

https://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf

http://oehha.ca.gov/education/pdf_zip/ArtOct2014.pdf



Disclaimer

This presentation outlines suggested policies on implementing California's Hazard Communication Standard in Title 8, California Code of Regulations, Section 5194 (8.CCR. 5194). Implementation of procedures outlined in this document along with individual Districts' requirements may be required at each location for an effective "right-to-know" or hazardous substance information and training program for your employees, and to comply with legal requirements.

Implementation of this program is site specific, and encompasses products which are normally approved for use by District employees in schools, offices, transportation, warehouses, maintenance and operation areas, and construction sites.



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Thank you!

Following today's presentation you will receive an email with a link to a short survey. We appreciate your feedback.



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Contact Information

HazMat Communications Program

3E Company

Silvia Kusel

Senior Regional Account

Representative

(760) 930-6622



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