SAN DIEGO
Community College District

San Diego Community College District
Risk Management Office

Hazard Communication Program

PROGRAM AUTHORIZATION

_____ Chancellor	
_____ Trustee _____ Trustee _____ Trustee	_____ Trustee _____ Trustee
_____ Vice Chancellor, Facilities	_____ Vice Chancellor, Human Resources
_____ Risk Manager	
Date:_____	

REVISION RECORD

Revision Date	Revision #	Initials	Contents of Revision
10/01/15	New	--	New
09/12/18	1704	TAW	Comprehensive update
03/19/19		DV	GHS Updates
02/26/25		MFC	Comprehensive Review

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I. PURPOSE

The San Diego Community College District, recognizing that the health, safety, and well-being of its employees are of paramount importance in the management of the District, affirms its commitment to create and maintain a safe and healthful working environment.

The San Diego Community College District's *Hazard Communication Program* (HazCom) provides direction to ensure that all hazardous materials used by employees in the performance of their duties are properly evaluated for their hazard and that sufficient information about such materials are communicated to employees in a manner that any risk to their health is minimized. The goal of the *Program* is to make employees aware of the inherent hazards of materials that they may encounter working at the District and how to properly handle the materials to reduce the potential for any exposure.

For the purposes of this *Program*, hazardous materials are those listed in the California Code of Regulations, Title 8, Section 339 as well as those listed in the Occupational Safety and Health Administration's 29 Code of Federal Regulations, Part 1910, Subpart Z.

The District has elected to rely on the hazardous substance manufacturer or importer to determine if a substance purchased is hazardous. The District will not perform any additional testing or label supplementation other than that provided by the manufacturer.

This *Program* is applicable to all operations in the District that use non-household chemicals.

II. REGULATORY CITATIONS

California Code of Regulations, Title 8, § 339
California Code of Regulations, Title 8, § 3204
California Code of Regulations, Title 8, § 3321
California Code of Regulations, Title 8, § 5194
California Code of Regulations, Title 27 § 25604.2
California Fire Code, Title 24, Part 9, Chapter 50
Code of Federal Regulations, Title 21, § 1310.02
Code of Federal Regulations, Title 29, § 1910.1200
Code of Federal Regulations, Title 29, § 1910, Subpart Z
National Fire Protection Association, 704, "Standard System for the Identification of the Hazards of
Materials for Emergency Response"
San Diego County Code 68.1113
United Nations, *Globally Harmonized System of Classification and Labelling of Chemicals (GHS)*

III. DISTRICT POLICIES AND PROCEDURES

SDCCD Board Policy 6800

IV. AUTHORITY

The Chancellor has ultimate authority and responsibility for the health and safety programs within the District. Creating broad-based safety accountability is the responsibility of the Chancellor and District leadership.

The Chancellor has designated the Vice Presidents of Administrative Services and the Regional Facilities Officers to act as the *HazCom* administrators at each College within the District. At the District Office, the designees are the Risk Manager and District Architect while at the District Service Center; it is the Director of Facilities.

To ensure effective implementation of this *Program*, all personnel with designated specific responsibilities are expected to understand and implement the procedures outlined in this document, together with the specific contents of this *Hazard Communication Program* for their assigned facility.

A. Chancellor's Designees

The Vice Presidents of Administrative Services and Facility Directors have the authority and are responsible for the implementation and maintenance of this program, including:

1. Developing or adopting the necessary policies and programs to adequately maintain a safe and healthful work and learning environment at the facilities of their responsibility
2. Conducting formal inspections of each assigned workplace as outlined. The inspections shall include appropriate documentation of the physical workplace, chemical hazards, work practices, new processes, recently reported accidents, and employee suggestions
3. Providing for the provisions in this *Program*
4. Identifying individuals responsible for implementing the various components of this *Program*
5. Recommending to the College Safety Committee any additions or changes to the *Hazard Communication Program*.

The Presidents and Facility Directors may designate these duties as appropriate.

B. Risk Management Office

The District Risk Management Office is responsible for the oversight and maintenance of this program, including:

1. Reviewing the *Program* annually and updating, as necessary
2. Evaluating the adequacy and consistency of chemical safety-related training in the District

3. Providing technical expertise to all Chancellor's Designees, as requested and required
4. Monitoring Cal/OSHA standards for relevant regulatory changes
5. Conducting periodic *Program* audits and inspections at District facilities to evaluate compliance with all Federal, State, County, District, and College Hazard Communication policies.

C. Supervisors

Supervisors are responsible for implementing and enforcing the provisions of this program, including:

1. Maintaining lists of all chemicals used in their area of responsibility and by their employees.
2. Ensuring that Safety Data Sheets (SDSs) have been entered into the database.
3. Maintaining copies of SDSs at their location, as appropriate.
4. Training employees on the elements of this Program and providing personal protective equipment and technical expertise.

D. Employees

Employees are responsible for

1. Completing all necessary training
2. Complying with all aspects of the *Hazard Communication Program*.
3. Educating themselves on the hazards of the chemicals they use.
4. Reporting any program deficiencies, or accidents, to their supervisor or the Risk Management Office.
5. Seeking out and requesting information from a supervisor when unsure about the safe handling of a chemical
6. Refrain from operations without proper instruction and/or authorization
7. Donning appropriate personal protective equipment (PPE).

E. Students

While students are not specifically covered under the provisions of the regulations due to their non-employee status, students shall be made aware of chemical health and safety hazards in laboratories. Blatant disregard for provisions of this program will result in dismissal from the laboratory or other areas where chemicals are present.

V. DEFINITIONS

1. *California Electronic Reporting System (CERS):* a statewide web-based system; the required mode for reporting and filing documents related to hazardous materials and

wastes;

2. *Chemical:* for the purposes of this *Program,* a chemical is any liquid, solid, or gas that has been prepared and packaged for use, including any mixtures, dilutions, or solutions thereof; this definition does not include pesticides, food, food additives, food coloring, cosmetics, over-the-counter pharmaceuticals, medical devices, veterinary devices, alcoholic beverages, consumer products packaged for consumer use and used as intended and in amounts a consumer would use, tobacco or tobacco products, or water;
3. *Employee:* any individual who receives compensation from the San Diego Community College District in exchange for services, including employed students;
4. *Fume hood:* a cabinet enclosed on three sides, top and bottom with an integral mechanical exhaust ventilation system designed to contain and minimize employee exposure to hazardous vapors, fumes, and mists by way of negative pressure;
5. *Global Harmonization System (GHS):* an internationally accepted system of classifying and labeling hazardous chemicals;
6. *Hazard statement:* part of the GHS labeling requirements; phrase assigned to a hazard class and category to describe the nature and degree of the hazard;
7. *Hazardous material/chemical:* a hazardous material or chemical is a substance that poses a viable risk to the health or well-being of an individual by way of its ability to burn (flammability), dissolve flesh or steel (corrosivity), result in deleterious health effects (toxic), or react with other chemicals in a manner that produces another hazard (reactivity); chemicals may also be classified by their known or suspected ability to cause cancer (carcinogen), impact the reproductive system (reproductive toxin), or impact a developing fetus (teratogen); the State of California and the Environmental Protection Agency also designate specific chemicals as ‘extremely hazardous’ and the Federal government designates specific chemicals as ‘acutely hazardous;’
8. *Hazardous waste:* a material that no longer serves a purpose to the Facility or College and has certain characteristics that are harmful to people or the environment; chemicals that are no longer useable for their original intended purpose or are no longer useful to the possessor; unused chemicals that are not wanted by the possessor are considered waste;
9. *Pictogram:* part of the GHS labeling requirements; graphic indicating the type of hazard a chemical presents; selected from nine standard graphics listed in Appendix D; note- OSHA does not require the use of the environmental hazard pictogram as this jurisdiction lies with the Environmental Protection Agency;
10. *Precautionary statement:* part of the GHS labeling requirements; phrase that describes the recommended measures that should be taken to minimize or prevent adverse effects;
11. *Safety Data Sheet (SDS):* standardized document created by the chemical manufacturer or supplier that contains information for the substance, such as physical characteristics, toxicological characteristics, safety information, first aid, protective equipment, and handling procedures;
12. *Secondary container:* container into which smaller amounts of chemical are transferred into from a stock container to transport chemicals to point-of-use; may be used by multiple parties or over extended periods of time; examples include dropper

bottles, portable gas cans, and squirt bottles;

13. *Signal word:* part of the GHS labeling requirements; a word used to indicate the level of severity of a hazard; the two signal words used are “Warning” for less severe hazards and “Danger” for the most severe;
14. *Stock container:* a container accessed by multiple parties that is used to hold chemicals; typically the container provided by the vendor;
15. *Transfer container:* a container into which smaller amounts of chemicals can be transferred into for single use; exempt from labeling requirements as long as used by only one person and only for one work shift;

VI. EXEMPTIONS

A. Exempted Materials

The following items are exempted from the requirements of this *Program*

1. Hazardous waste
2. Untreated wood or wood products
3. Food, pharmaceuticals, or cosmetics intended for personal consumption by employees
4. Consumer products packaged for use by the general public.

B. Labeling Exemptions

The following are exempted from the labeling requirements of this *Program*

1. Pesticides (including rodenticides, insecticides, and fungicides)
2. Food
3. Cosmetics
4. Pharmaceuticals
5. Consumer products.

C. Proposition 65

The District, being a State agency, is not subject to the provisions of the *Safe Drinking Water and Toxic Enforcement Act* (Proposition 65) (8 CCR 5194 (b)(6)(A)(2)) which requires warning statements if carcinogens or reproductive toxins are present at a business or facility. However, the District acknowledges that substances listed pursuant to the Act are found at District facilities and will abide by the regulations.

VII. CHEMICAL INVENTORY

Each Department that routinely uses or stores hazardous chemicals shall maintain an inventory of all chemicals (8 CCR 5194(e)(1)(A)).

1. The inventory shall be updated annually (SD Co Ord 68.909).
    a. Refer to Appendix A for an example of a chemical inventory form.
2. The inventory shall be readily available to all employees.
3. The inventory may be electronic.
4. The inventory shall indicate whether
    a. A Safety Data Sheet (SDS) has been received.
    b. The SDS has been uploaded to the Keenan SafeColleges SDS database.
    c. The chemical has been removed from the inventory and the date it was removed.
5. The inventory shall be compared annually to the Proposition 65 list of carcinogens and reproductive toxins (http://oehha.ca.gov/proposition-65/proposition-65-list) (SD Co Ord 68.1113).
    a. If the College or Facility has or has used any of those chemicals at any time during the previous year, the chemicals and estimated amounts must be uploaded into the California Environmental Reporting System (CERS).
        1) The *Disclosure of Hazardous Materials Information Bulletin* (HM-9243) used to report these chemicals can be found on the San Diego County Environmental Health, Hazardous Materials Division's website.
    b. The form must be completed regardless of any other forms or permits filed.
    c. There is no fee for filing this form.
    d. If there are no changes in amounts or substances for the previous year, a certified statement to that effect must be made in CERS.

6. Restricted Chemicals
    a. Each College or Facility shall determine whether or not they have or use DEA List I or List II noted in 21 CFR 1310.02(a) and (b). Refer to Appendix C for the lists.
        1) For the purposes of the requirements of 21 CFR, Chapter II, the District does not meet the definition of a 'regulated person.'
    b. The following chemicals are exempted from the recording and audit requirements of restricted chemicals
        1) Acetone
        2) Ethyl ether
        3) Potassium permanganate
        4) Toluene
        5) Hydrochloric acid
        6) Sulfuric acid.
    c. The following chemical will be included in the recording and audit requirements of this section:
        1) Absolute/anhydrous ethanol
    d. The Listed chemicals shall be recorded on the annual chemical inventory.
    e. In addition, the following shall apply to Listed chemicals:
        1) The chemicals shall be kept in an appropriate locked storage container, separate from all other chemicals.
            a) Appropriate means for separating and segregating

incompatible chemicals shall be adhered to in this separate storage container.

2) Any removal and use of these chemicals shall be tracked using the *Listed Chemical Tracking Log* in Appendix B.
    a) Containers shall be weighed (gross weight) before and after aliquots have been removed from the container for use by faculty, staff, or students.
3) An annual audit of these chemicals will be performed by two (2) people.
    a) The annual audit will include weighing and recording the containers (gross weight).
    b) Any discrepancies will be immediately brought to the attention of the Dean or Facility Director.

VIII. LABELING

Container labels are typically the first and most available source of the potential hazards of a substance.

A. Stock Containers

A stock container is the original container that is received directly from a vendor. The container may be metal, glass, plastic, or a combination, depending on the substance.

1. Chemicals should be kept and stored in the container supplied by the manufacturer.
    a. In the event a chemical must be repackaged due to damage or sub-sampling, the new container shall be compatible with the material and the label shall include all of the required elements in English.
2. Every container label must contain
    a. Product identifier
    b. Signal word (“Hazard” or “Danger”)
    c. Hazard statement(s)
    d. Pictogram(s)
    e. Precautionary statement(s)
    f. Name, address, and telephone number of manufacturer.
3. If the manufacturer’s label is missing any of the above noted information, the individual who receives the chemical must supplement the label to satisfy all of the requirements.
    a. Information can be found on the Safety Data Sheet
    b. Labels on chemicals received prior to June 1, 2016 shall have the appropriate signal word, hazard statement, pictograms, and precautionary statements permanently affixed.
        1) The container shall also have a permanent label attached stating “Received before June 1, 2016.”
4. Labels shall not be removed or intentionally defaced.

a. If the container is to be repurposed, appropriate identifying information shall be placed over the original label in a manner that clearly states the identity and the hazardous properties of the contents.
b. Only containers that are to be disposed of as hazardous waste shall be marked “Empty.”
c. Labels that have been damaged or defaced must be relabeled with all of the information noted in VII.A.2, above.
    1) Each chemical shall be marked with the date received and the initials of the individual who received the chemical.
    2) The Department using the material must revise the labels within six (6) months of being notified by the manufacturer of any changes in the hazard classification of the material.

B. Secondary Containers

Secondary containers are containers used to supply smaller amounts of chemicals from bulk containers to more than one location at a particular Campus or Facility, such as instructional laboratories or custodial closets.

1. Secondary containers must be of similar material and quality to the original.
    a. Secondary containers for flammable and volatile chemicals must provide the same level of vapor containment as the original container.
    b. If not, they must be stored in a chemical fume hood or other properly ventilated location.
2. Secondary containers must be labeled with the name of the chemical or common name, in English.
    a. Employees who speak other languages may request the name be written in their language, but the English label must be retained and not obscured.
    b. The concentration of the chemical shall also be noted, if appropriate.
    c. To the greatest extent possible secondary containers should be labeled with the same information as primary containers.
3. Secondary containers must also be labeled with at least (8 CCR 5194(f)(6)):
    a. General Hazard Information that conveys the physical and health hazards of the hazardous material using words, pictures, symbols, or combination thereof.
    b. Date chemical was transferred into container.

C. Transfer Containers

A transfer container is used to transport chemicals from a properly labeled container to a point of use. The container is typically smaller than the original container to allow for easier handling.

1. The portable transfer container is not subject to the labeling requirements if the contents are
    a. Under the constant control of the individual who transferred the chemical

   b. Used within one work shift of being dispensed
   c. Used only by the individual who dispensed the chemical.
2. If any of these criteria are not met at all times, the container is subject to the secondary container labeling requirements noted in VII.B.3.
3. Transfer containers for flammable and volatile chemicals must have a means to prevent vapors from escaping the container.

D. Pipes

Pipes may be used to transport hazardous fluids or gases within a facility. Pipes must be labeled pursuant to 8 CCR 3321.

1. Pipes shall be labeled in locations where multiple pipes follow the same run and confusion of pipes may present hazards to employees.
2. Pipes containing non-hazardous materials, such as potable water, are not required to be coded or labeled except when sharing a run with pipes containing hazardous materials.
   a. Compressed air lines, presenting a high-pressure hazard, shall be labeled in accordance with this section.
3. Non-potable and deionized water pipes shall be labeled pursuant to this section.
4. Pipes shall be identified by one or more of the following methods:
   a. Color-coded by complete painting of all visible portions
   b. Color-coded by color-banding of visible portions (8-10 inch-wide bands at regular intervals)
      1) The color code legend shall be posted
         a) Where the pipes enter the building
         b) Where the pipes enter a room within a building
         c) At the point of use.
   c. Labeling or abbreviating content name near the valves or outlets by way of stencils.
      1) Labels shall be in English.
         a) Employees who speak other languages may request the pipe be labeled in their language, but the English label must be retained.
      2) Labels shall be clearly visible.
   d. Durable tags with the name of the material in the pipe fastened on or near the valve.
5. Pipes should be clearly labeled as to their direction of flow.
6. Pipes moving waste do not require specific names but should be labeled.

IX. PROPOSITION 65 WARNINGS

“Proposition 65” refers to a list of chemicals known to cause cancer, birth defects, or reproductive harm. This list is updated and published annually by the State of California and is maintained by the Office of Environmental Health Hazard Assessment.

1. The following conspicuous signs, compliant with 27 CCR 25604.2, shall be posted at least in the areas listed below (Note- for areas where both warnings are required, a single sign listing both warnings is acceptable):
    a. "WARNING: This area contains a chemical known to the State of California to cause cancer"
        1) Chemical storage areas, including waste storage locations
        2) Areas where vehicle exhaust is concentrated or generated in close proximity to employees, including, but no limited to
            a) Multi-level parking structures
            b) Automotive and diesel vocational facilities
            c) Vehicle maintenance facilities
        3) Student Health Clinics
        4) Designated smoking areas
        5) Areas where wood dust is generated.
    b. "WARNING: This area contains a chemical known to the State of California to cause birth defects or other reproductive harm."
        1) Chemical storage areas, including waste storage locations
        2) Designated smoking areas
        3) Student Health Clinics.

X. SAFETY DATA SHEETS

Safety Data Sheets (SDS) contain information regarding composition, hazards, first aid, handling and storage, personal protection, physical and chemical properties, toxicological information, and other information for a specific hazardous substance.

A. SDSs

SDS's are produced by the chemical manufacturer, importer, or distributor and are in a standardized, 16-section format. Refer to Appendix G for section descriptions.

1. A hazardous chemical or substance may not be used by employees of the District unless an SDS has been received and is on file.
    a. SDSs should be shipped with the material, or they may be sent prior to shipment.
    b. If an SDS has not been received, the requesting employee shall contact the manufacturer or vendor and request an SDS.
        1) In instances where SDSs can be retrieved from a vendor's website, the employee must verify the product number matches that on the substance received.
        2) SDSs from different vendors are acceptable as long as all of the ingredients (including CAS numbers) are identical.
2. Unless listed as an exemption, all hazardous chemicals and preparations are required to have an SDS on file.
    a. Mixtures that have the same components but only differ by concentrations do not require separate SDSs (e.g., 5% bleach and 10% bleach solutions

require only a single SDS).

3. SDSs shall be available to all employees electronically on the Keenan SafeColleges website.
    a. SDSs must be uploaded into the database within five (5) days of receipt.
    b. SDSs received with shipments shall be verified to be in the database.
        1) If the date on the uploaded SDS is older than two (2) years, it must be replaced by the most recent version of the SDS for that substance, if available.
4. Copies of SDSs should be kept in a central location for each Department for the chemicals and substances they use routinely.
    a. SDSs may also be located in instructional laboratories to be made available to students.
    b. Due to the first aid information they contain, SDSs must be immediately available in the event of exposure.
5. Employees may not use a chemical until they have been allowed to review the SDS and have been informed of the hazards the substance presents.
6. Whenever the District receives a new or updated SDS, the SDS will be distributed or a short training session with all affected employees will be conducted within thirty (30) days of receipt by the District.

B. Trade Secrets

In some instances, manufacturers may opt to not provide the exact chemical or concentration of chemicals in their products in an attempt to preserve their proprietary formulations. SDS's that have 'trade secret' entries must still convey the properties and effects of the ingredients.

1. In the event of an exposure to an employee where the ingredients are designated as a trade secret, the supervisor shall provide the treating physician or licensed healthcare professional (PLHCP) with the SDS of the chemical.
    a. If the situation is an emergency, the PLHCP can contact the manufacturer using the information on the SDS to obtain relevant information.
    b. If the situation is not an emergency, the PLHCP or Risk Management Office designee shall prepare a formal written request, pursuant to 8 CCR 5194(i)(3), for the manufacturer to provide the relevant information.

C. SDS Online

The District uses Keenan SafeColleges SDS (http://sdccd-keenan.safecollegessds.com/) as an online repository for all SDS's used at District facilities.

1. Each College and Facility has a designated individual to assign access permissions for the database.
    a. The designee must provide permissions to allow employees to upload SDS's into the database.

   b. Any employee can view the database without needing access permissions.
2. The SDS's are cataloged by Site (College or Facility) and by Collection (Department or Area).
3. If a chemical that is used by one College or Facility is used by another, they do not have to replicate the SDS but can associate that SDS with the appropriate College or Facility.
   a. Associated SDS's must be for the same CAS or product number and must be from the same manufacturer or vendor.
4. Chemicals that are no longer used by a College or Facility can be 'unassociated.'
   a. If the individual who 'unassociates' a chemical is the last College or Facility to do so, they must then associate that chemical with the 'Archived Chemicals' collection.
      1) The following shall replace the name of the manufacturer in the "Manufacturer Information" block:
         a) "Archived YYYY_MM_" followed by Facility and initials of individual who archived chemical.
5. An employee who uploads an SDS is responsible for the following (data can be found on the Safety Data Sheet):
   a. Verifying all pages of the SDS have been uploaded successfully
   b. Properly entering the name, address, and phone number of the manufacturer or vendor
   c. Entering the date the SDS was uploaded under the heading "Effective Date"
   d. Selecting the correct pictograms
   e. Entering the proper values for NFPA and HMIS ratings
   f. Entering the signal word
   g. Enter the proper hazard statement(s)
   h. Enter the proper precautionary statement(s).
   i. NOTE- extreme diligence in data entry is required as SDS's cannot be deleted from the database, but only archived.
      1) If an error is realized after the SDS has been entered into the database, the incorrect SDS must be archived and a new version uploaded.
      2) For SDSs with data errors, the following shall replace the manufacturer in the "Manufacturer's Information" block:
         a) "Entry error_YYYY_MM_" followed by Facility and initials of individual who recognized and corrected error.

XI. NON-ROUTINE TASKS

In the event an employee is to perform a non-routine task involving chemicals, the supervisor shall meet with them prior to starting the task. The meeting shall be documented and the supervisor shall

1. Discuss the process to be performed.

2. Inform the employees of the hazards.
3. Allow the employees to review the SDSs for the chemicals involved, including the contents of unlabeled pipes.
4. Allow the employees to ask questions.

XII. OUTSIDE CONTRACTORS

The District is required to notify outside contractors, vendors, and service companies regarding the potential chemical hazards present in the area they will be working. Additionally, contractors shall inform the Department they will be working for of any hazardous substances they intend to bring on site in order to perform their tasks.

1. The District representative who will be interfacing with the contractor must obtain a list of chemicals present in the area the contractor will be working prior to the start of the job.
    a. The District representative will offer to provide the list to the contractor prior to the work beginning.
    b. The District representative will provide the contractor with the location of the physical copies of the SDSs for the area they will be working.
        1) Contractors are required to provide a list, in the bid package, of all hazardous substances they intend to use on District premises during their work.
    c. The list is to be retained by the Facilities Maintenance Department for that College or Facility while the work is being performed.
    d. The Contractor performing the work must provide the SDSs documents for the proposed hazardous substances they intend to use prior to the commencement of work.
        1) Alternate or additional substances shall not be allowed unless pre-authorized by the Department contact and the Risk Management Office.
    e. The Contractor is required to maintain copies (on site) of the SDS for all chemicals and chemical preparations they will use.
        1) The District reserves the right to deny use of any chemical the Contractor wishes to use if there is a suitable, less hazardous substitute.
        2) All chemicals brought onto the premises must be labeled as required by this Program.
        3) The contractor may be asked to provide records of their Hazard Communication Training Program.
            a) Records requested may include topics, content, and training rosters.

XIII. STORAGE LOCATION MARKINGS

1. All storage locations for hazardous materials or hazardous wastes shall be labeled with warning signs in accordance with NFPA 704 on each door or

entrance. Refer to Appendix E for labeling and Appendix F for relationship to GHS.
    a. Opaque and solid cabinets or storage lockers containing chemicals shall also be labeled with an NFPA 704 compliant sign.
    b. NFPA 704 values will be a composite rating based on assessing all of the chemicals within the storage area and using the highest value of any one chemical for each category.
        1) Example, if room contains Chemical A with a NFPA 704 rating of H-1, F- 3, R- 0 and Chemical B with H-3, F-2, R-1, then the storage facility will be labeled H-3, F-3, R-1.
2. Rooms and areas containing compressed gases shall be marked "COMPRESSED GAS."
3. All storage locations for hazardous materials and hazardous waste shall be labeled with a warning sign in accordance with 27 CCR 25604.2 that include the following warning:
    a. "Warning: This facility contains one or more chemicals known to the State of California to cause cancer, birth defects, or reproductive harm."
        1) Exact verbiage may differ.

XIV. TRAINING

All District employees who handle chemicals or chemical preparations are required to obtain a certificate of completion for the course "Hazard Communication: Right to Know" available on the Keenan SafeColleges portal

A. Frequency

1. Training shall be conducted for all employees prior to using hazardous materials.
2. Refresher training shall be conducted
    a. Annually
    b. When new chemicals are introduced into the workplace
    c. When new hazards are identified for existing chemicals.

B. Content

Keenan SafeColleges training will address the following topics:

1. Describe the purpose of the Hazard Communication Standard
2. Identify employer and employee responsibilities for safely communicating hazardous chemicals in the workplace
3. Interpret key information found on container labels and in Safety Data Sheets
4. Hazards presented by chemicals, including
    a. Physical hazards
    b. Chemical hazards
    c. Health hazards
    d. Simple asphyxiants

e. Hazards of combustible dusts, if appropriate
f. Pyrophoric gas hazards, if appropriate
g. Other hazards presented by chemicals they may encounter
h. Training may consist of information concerning general classes of hazardous materials rather than specific compounds and may be limited to those materials that the employee may be exposed to regularly or in a reasonably foreseeable emergency.
    1) Measures to protect themselves from chemical and physical hazards including work practices, emergency procedures, and personal protective equipment
    2) Explanation of the GHS labels including
i. Hazard statements
j. Precautionary statements
k. Pictograms
    1) Container and pipe labeling requirements
    2) Explanation of the SDS sections
    3) Employee rights under the Hazard Communication Standard, including
l. Right to personally receive information regarding hazardous chemicals
m. Right for their physician or labor representative to receive information regarding hazardous chemicals
n. Protection from discharge for exercising these rights.
    1) Supervisors shall be trained in understanding SDS by the Safety Officer and shall be responsible for training all employees reporting to them.

Additional, in-person training for employees handling chemicals as part of their duties will address the following topics:

1. Operations employees may perform that involve hazardous chemicals
2. The presence and locations of chemicals in the employee's work area, regardless of whether the employee's duties require contact with the materials
3. Chemicals that employees may encounter during their normal duties that are published on the *Safe Drinking Water and Toxic Enforcement Act* (Proposition 65) list
4. Location and availability of this written *Program*
5. Location and availability of chemical inventory lists, including online
6. Location and availability of Safety Data Sheets (SDS), including online
7. Methods of detecting the presence or release of hazardous substances

XV. RECORDS

1. All SDSs for hazardous substances that are no longer used in the District will be removed from the files thirty (30) years after it was last used by the District.
    a. SDSs for chemicals that are no longer in use by a Department can be removed from the physical SDS collection after five (5) years from the date

the chemical was disposed of.

1) Before the SDS is removed, its presence in the Keenan Online system must be verified.
    a) If the SDS is not in the online system, it must be uploaded before the physical copy is destroyed.
    b) The information regarding its status must be entered as per IX.C.4, in this *Program.*

b. SDSs are currently not able to be removed from the Keenan Online system and will remain in the 'archive' file indefinitely.
    1) If the system changes to allow removal, SDSs can be removed from the system thirty (30) years after they were placed in the archive file.

2. Employee training records shall be maintained for a minimum of three years.

Appendix A: Chemical Inventory Form

College / Facility		Building		Department	

Chemical name	CAS	Manufacturer	Location	Prop 65	Amount (total V or mass)	SDS rec'd	SDS uploaded	Removed from inventory

Appendix B: Listed Chemical Tracking Log

College/ Facility		Building		Department	

Chemical name	CAS	Manufacturer	Location	List I/II	Amount	SDS rec'd	SDS uploaded	Date received

Date	Amount removed	Person removing

Date	Amount removed	Person removing

Annual Audit

Date	Gross wt	Auditor	Auditor
Removed from inventory			

Appendix C: DEA Listed Chemicals

List I chemicals

(1) Anthranilic acid, its esters, and its salts
(2) Benzyl cyanide
(3) Ephedrine, its salts, optical isomers, and salts of optical isomers
(4) Ergonovine and its salts
(5) Ergotamine and its salts
(6) N-Acetylanthranilic acid, its esters, and its salts
(7) Norpseudoephedrine, its salts, optical isomers, and salts of optical isomers
(8) Phenylacetic acid, its esters, and its salts
(9) Phenylpropanolamine, its salts, optical isomers, and salts of optical isomers
(10) Piperidine and its salts
(11) Pseudoephedrine, its salts, optical isomers, and salts of optical isomers
(12) 3,4-Methylenedioxyphenyl-2-propanone
(13) Methylamine and its salts
(14) Ethylamine and its salts
(15) Propionic anhydride
(16) Isosafrole
(17) Safrole
(18) Piperonal
(19) N-Methylephedrine, its salts, optical isomers, and salts of optical isomers (N-Methylephedrine)
(20) N-Methylpseudoephedrine, its salts, optical isomers, and salts of optical isomers
(21) Hydriodic Acid
(22) Benzaldehyde
(23) Nitroethane
(24) Gamma-Butyrolactone (Other names include: GBL; Dihydro-2 (3H)-furanone; 1,2-Butanolide; 1,4-Butanolide; 4-Hydroxybutanoic acid lactone; gamma-hydroxybutyric acid lactone)
(25) Red phosphorus

(26) White phosphorus (Other names: Yellow Phosphorus)
(27) Hypophosphorous acid and its salts (Including ammonium hypophosphite, calcium hypophosphite, iron hypophosphite, potassium hypophosphite, manganese hypophosphite, magnesium hypophosphite and sodium hypophosphite)
(28) N-phenethyl-4-piperidone (NPP)
(29) Iodine
(30) Ergocristine and its salts

List II Chemicals:

(1) Acetic anhydride
(2) Acetone*
(3) Benzyl chloride
(4) Ethyl ether*
(5) Potassium permanganate*
(6) 2-Butanone (or Methyl Ethyl Ketone or MEK)
(7) Toluene*
(8) Hydrochloric acid (including anhydrous hydrogen chloride)*
(9) Sulfuric acid*
(10) Methyl Isobutyl Ketone (MIBK)
(11) Sodium Permanganate

*The District has exempted these chemicals from the requirements of Listed chemicals.

Appendix D: GHS Pictograms

Hazard Communication Standard Pictogram

Health Hazard  • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	**Flame**  • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	**Exclamation Mark**  • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  • Gases Under Pressure	**Corrosion**  • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals	**Exploding Bomb**  • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  • Oxidizers	**Environment** (Non-Mandatory)  • Aquatic Toxicity	**Skull and Crossbones**  • Acute Toxicity (fatal or toxic)

Appendix E: NFPA 704 Hazard Identification System

FIRE HAZARD	
4	Extremely
3	flammable Ignites at normal
2	temperatures Ignites when
1	moderately heated
0	Preheated to

HEALTH HAZARD	
4	Highly toxic
3	Extremely dangerous, use protective clothing
2	Hazardous, use breathing apparatus
1	Slightly
0	hazardous Non-

REACTIVITY/INSTABILITY	
4	May detonate, vacate area
3	Shock/heat may detonate
2	Violent chemical change possible
1	Unstable if heated
0	Stable

SPECIAL HAZARDS	
OX	Oxidizer
SA	Simple Asphyxiate (Ar, He, Kr, Ne, N, Xe)
~~W~~	Water reactive

Appendix F: Differences between NFPA System and GHS System

	NFPA 704	GHS/HazCom System
Purpose	Basic information for emergency personnel responding to a fire or spill and planning for emergency response	Informs about hazards of chemicals in workplace under normal conditions and foreseeable emergencies
System Numbering	0-4 0-Least hazardous 4-Most hazardous	1-4 1-Most severe hazard 4-Least severe hazard
Information on label	Health- Blue Flammability- Red Instability- Yellow Special Hazards- White	Product identifier Signal word(s) Hazard statement(s) Pictogram(s) Name, address, phone
Website	www.nfpa.org/704	www.osha.gov/dsg/hazcom/index.

Appendix G: Safety Data Sheet Sections

1. Identification: identifies the chemical on the SDS, contact information of supplier, recommended use of chemical
2. Hazard(s) Identification: identifies the hazards of the chemical with appropriate warnings including hazard classification, signal word, statement, pictograms, and descriptions
3. Composition/Information on Ingredients: identifies the ingredients contained in the product including impurities and stabilizers
4. First-Aid Measures: describes the initial care that should be given by untrained responders
5. Fire-Fighting Measures: provides recommendations for fighting a fire caused by the chemical
6. Accidental Release Measures: provides recommendations on the appropriate response to spills, leaks, or releases including containment and cleanup practices to prevent or minimize exposure
7. Handling and Storage: provides guidance on the safe handling practices and conditions for safe storage of chemicals
8. Exposure Controls/Personal Protection: indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure
9. Physical and Chemical Properties: identifies physical and chemical properties associated with the substance or mixture
10. Stability and Reactivity: describes the reactivity hazards of the chemical and the chemical stability information
11. Toxicological Information: identifies toxicological and health effects information or indicates that such data are not available
12. Ecological Information: provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment
13. Disposal Considerations: provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices
14. Transport Information: provides guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea
15. Regulatory Information: identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS
16. Other Information: indicates when the SDS was prepared or when the last known revision was made

TRAINING RECORD

Facility: _____

Date	Time	Instructor

Name (print)	Signature	Department	Supervisor