



December 2, 2020

Mr. Daniel Phillips
Assistant Director Safety & Risk Management
SANTA MONICA COMMUNITY COLLEGE DISTRICT
1900 Pico Boulevard
Santa Monica, CA 90405

RE: HAZARDOUS MATERIALS INVENTORY REPORT

Dear Mr. Phillips:

Enclosed is the report for the Hazardous Materials Inventory (HMI) conducted for the District on November 9, 10, 12, and 16-18, 2020. The HMI was conducted in accordance with requirements set forth by local, state and federal regulatory agencies.

It has been a pleasure to be of service to the District in the area of Loss Control/Risk Management, and to assist you with providing a safe environment for students and the general public. If you have any questions concerning the report, kindly contact me directly at (310) 212-0363, extension 2643.

Sincerely,

Iris Penales

Iris Penales
Consultant
Loss Control/Risk Management

Enclosure
IP/cb

cc: Craig Farmer, Attorney, Farmer Smith and Lane LLP
Nicole Fayaz, Keenan & Associates, Torrance
Brad Keenan, Keenan & Associates, Torrance

This report prepared by Keenan & Associates is intended strictly for the use of legal counsel and only those employed by the District having a need to know in order to address conditions assessed in this report and/or confer with legal counsel. To preserve and protect the confidential and privileged nature of this report, the report should not be copied or distributed by the District and should be filed and maintained in strict confidence by the District.

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The report is based on conditions and operations that existed at the time of the inspection. The information contained in this report does not certify that all locations, unsafe conditions, violations of state, federal or local regulations or laws are in compliance, nor does it conclude that all possible infractions, hazards or hazardous conditions were observed or reported.

HAZARDOUS MATERIALS INVENTORY REPORT

November, 2020

PREPARED FOR

SANTA MONICA COMMUNITY COLLEGE DISTRICT

Prepared By

**Iris Penales
Consultant**

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TABLE OF CONTENTS

- I. INTRODUCTION
- II. ACKNOWLEDGEMENTS
- III. LIMITATIONS
- IV. SHELF LIFE
- V. SAFETY DATA SHEETS
- VI. SCOPE OF SERVICES
- VII. SITES AND AREAS INSPECTED
- VIII. SUMMARY
- IX. PROGRAM REVIEW
- X. IMMEDIATE/HIGH PRIORITY RECOMMENDATIONS
- XI. GENERAL RECOMMENDATIONS
- XII. SITE SPECIFIC RECOMMENDATIONS

I. INTRODUCTION

Keenan & Associates conducted a Hazardous Materials Inventory (HMI) for Santa Monica Community College District on November 9, 10, 12, and 16-18, 2020. Conditions noted during the HMI that directly relate to safety are listed in sections IX and X of this report. All findings are listed with associated recommendations.

Iris Penales, Loss Control Consultant, conducted the HMI and prepared the subsequent report. Clare Brooks, Project Coordinator, processed the HMI report.

II. ACKNOWLEDGMENTS

Keenan & Associates would like to thank Daniel Phillips and the Facilities Department for their assistance and cooperation.

III. LIMITATIONS

A sincere effort was made to identify hazardous materials at each location within the District. The locations are listed in the Sites Surveyed section. Although the Hazardous Materials Inventory was not an inspection or audit, it is viewed as an opportunity to communicate to the District those safety issues relating to hazardous materials management, which were observed during the course of the inventory.

The information in this report does not conclude that all possible infractions, hazards, or hazardous materials were observed. Keenan & Associates is not responsible for hazardous materials that may be located in areas in which only District staff may be aware and did not make Keenan & Associates aware of it.

Keenan's Hazardous Materials Compliance program services are intended to help clients identify and mitigate hazards and potential Hazardous Materials exposures. Keenan is not responsible for hazardous materials that may be located in areas in which only District staff may be aware of. While we are confident that our services will help our clients create a safer environment, we do not represent or guarantee that we were able to identify all potential hazards, find and inventory all hazardous materials at each site, or offer a fail-safe mechanism for dealing with them. Consequently, we make no promise or representation that clients will recognize improved hazardous materials and/or regulatory compliance fine savings, loss experience or premium savings as a result of these services.

Keenan's Hazardous Materials Compliance program services are not intended to substitute for regular, ongoing internal hazardous materials program efforts. Nor are they intended to replace any required service that is to be routinely performed by licensed or certified service professionals (e.g., hazardous waste disposal contractors and hazardous waste haulers, etc.)

IV. SHELF LIFE

The life expectancy of chemicals can be affected by storage conditions. Ideal conditions (25 degree C at 50% or less relative humidity) will support the maximum shelf life. These times are general and, since storage conditions vary widely, should be taken in that context. All chemicals should be dated upon receiving and again with a "first opened" date. All manufacturer/supplier expiration dates should be strictly adhered to.

Any chemical that has changed physical state over time, either a crystal/powder/etc. becoming liquefied or a liquid that has begun to crystallize should be set aside for immediate proper disposal.

V. SAFETY DATA SHEETS

In accordance with Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), chemical manufacturers and importers shall obtain or develop a Safety Data Sheet (SDS) for each hazardous chemical they produce or import. Employers shall have an SDS in the workplace for each hazardous chemical which they use.

VI. SCOPE OF SERVICES

The primary purpose of the Hazardous Material Inventory (HMI) is to provide the District with a list of all the hazardous materials in the workplace. This will assist the District in complying with Title 8 of the Hazard Communication Regulations and also in completing their Hazardous Material Business Plan reporting requirements under the California Fire Code, California Code of Regulations (CCR), Title 24, Part 9, and California Health and Safety Code (CHSC) Chapter 6.95, Section 25505.

Locations that are typically inventoried include, but are not limited to:

Agriculture/Horticulture	HVAC Supply
Health Sciences (i.e., Nursing, EMT)	Industrial Technology
Aquatic Center	Jewelry
Auto Technology	Maintenance & Operations (Facilities)
Classified /Support Areas	Natural Science (i.e., Chemistry, Life Science)
Construction Technology	Performing Arts/Scene Shop
Cosmetology	Photography
Custodial Supply	Physical Education
Faculty Workroom/Copier Room	Power Plant(s)
Fine Arts	Warehouse
Food Service/Cafeteria	

VII. SITES AND AREAS INSPECTED

The following areas were inspected at the sites listed below:

- Santa Monica Community College District
 - ADMINISTRATION
 - | CUSTODIAL STORAGE | DIESEL GENERATOR
 - AIRPORT CAMPUS
 - | CERAMICS 170 | CUSTODIAL STORAGE 111 | PAINTING STUDIO 117
 - BUNDY CAMPUS
 - | CUSTODIAL STORAGE | DIESEL GENERATOR | GROUNDS STORAGE BIN | NURSING CLASSROOM 340 | NURSING SIMULATION CLASSROOM 336 | ROOFTOP STORAGE
 - CENTER FOR MEDIA AND DESIGN
 - | ABOVE GROUND STORAGE TANK (FOR GENERATOR) | CUSTODIAL STORAGE | D BLDG. STAIRCASE CLOSET | KCRW BLDG. ENGINEERING & IT 230 | OUTSIDE CHILLER AREA
 - DISTRICT WAREHOUSE NEAR 14TH ST.
 - | CUSTODIAL SUPPLIES
 - EMERITUS COLLEGE
 - | ART 204 | ART 205 | CUSTODIAL STORAGE
 - MADISON CAMPUS / PERFORMING ARTS CENTER
 - | CUSTODIAL STORAGE | GROUNDS OFFICE | TRAP ROOM FLAMMABLE CABINET
 - SANTA MONICA COLLEGE
 - | ARTS COMPLEX 102 PAINTING STUDIO | ARTS COMPLEX 112 LAB TECH OFFICE | ARTS COMPLEX 124 SCULPTURE | ARTS COMPLEX 125 ACID ROOM | ARTS COMPLEX 126 PRINTMAKING | ARTS COMPLEX 126 PRINTMAKING FLAMMABLE CABINET | ARTS COMPLEX 126A INSTRUCTOR'S OFFICE | ARTS COMPLEX 126B LASER PRINT WORKSHOP | BUSINESS BLDG. 143 COSMETOLOGY | CAMPUS CUSTODIAL STORAGE | CAYTON CTR CK

CAFE | CAYTON CTR CORSAIR CAFE | CAYTON CTR EAT ST. | CAYTON CTR HEALTH SERVICES | CAYTON CTR TCBY/COFFEE SPOT | CENTRAL PLANT | CITY COMMUNITY POOL (NOTE: DISCLOSED BY CITY REP.) | DIESEL GENERATOR AT DRESCHER | DIESEL GENERATOR AT KCRW | DIESEL GENERATOR AT LRC BLDG. | DIESEL GENERATOR AT MEDIA CENTER | DIESEL GENERATOR AT PARKING STRUCTURE 3 | DIESEL GENERATOR AT SCIENCE BLDG. | DIESEL GENERATOR AT STUDENT SERVICES BLDG. | DRESCHER BLDG. 126 PHOTOGRAPHY LAB | LIFE SCIENCE GREENHOUSE FLAMMABLE CABINET (1744 PEARL ST) | MAINTENANCE CARPENTRY & LOCKSMITH SHOP | MAINTENANCE ELECTRICAL | MAINTENANCE GROUNDS OUTDOOR CAGE | MAINTENANCE GROUNDS YARD | MAINTENANCE HAZARDOUS WASTE AREA | MAINTENANCE METAL SHOP | MAINTENANCE PAINT SHOP 132 | MAINTENANCE PAINT STORAGE 130 | MAINTENANCE PAINT STORAGE 134 | MAINTENANCE PESTICIDE STORAGE BIN | MAINTENANCE PLUMBING & HVAC | MAINTENANCE/RECEIVING YARD | PAC BLDG. 130 THEATER SCENE SHOP | POLICE DEPT. (1718 PEARL ST) | SCI BLDG. 021 BASEMENT COMPRESSOR ROOM | SCI BLDG. 125 LIFE SCIENCE PREP LAB | SCI BLDG. 130 BIOLOGY STUDENT PROJECTS | SCI BLDG. 132-133 ZOOLOGY LAB | SCI BLDG. 173/174 HAZARDOUS WASTE STORAGE & OVER FLOW | SCI BLDG. 175 BUNKER CHEMICAL STORAGE - BIOLOGY | SCI BLDG. 175 BUNKER CHEMICAL STORAGE - CHEMISTRY | SCI BLDG. 176 FIELD BIOLOGY STORAGE | SCI BLDG. 202 LIFE SCIENCE PREP LAB | SCI BLDG. 208 MICRO SUPPORT LAB | SCI BLDG. 221 ANATOMY PREP LAB | SCI BLDG. 226 LIFE SCIENCE PREP LAB | SCI BLDG. 303 CHEMISTRY INSTRUMENT LAB | SCI BLDG. 305 ORGANIC CHEMISTRY LAB | SCI BLDG. 318 MAINTENANCE & OPERATIONS | SCI BLDG. 320 CHEMISTRY STUDENT PROJECTS | SCI BLDG. 322 GENERAL CHEMISTRY LAB | SCI BLDG. 326-328 CHEMISTRY STOCK ROOM | SCI BLDG. 333-338 PLANT PROPAGATION LAB | SCI BLDG. BASEMENT LIFE SCIENCE STORAGE | SCI BLDG. BASEMENT PHYSICAL SCIENCES STORAGE | TCBY/COFFEE STAND (NEXT TO DRESCHER)

VIII. SUMMARY

It's been said that "safety doesn't happen by accident," and that is so true. Every year the District continues to improve in the safe handling and management of its chemicals. Employee training plays a crucial role in promoting best practices of chemical safety, but it is what employees decide to use from their training that truly matters.

It's important to highlight where and how these improvements occur so that they can be applied to all areas. During the inspection, it was observed that more employees are utilizing Keenan SafeColleges SDS for their container labels. I'd like to recognize Photography and the Science Departments for their effective use of secondary container labeling. The Science Department has also done an excellent job cleaning up its ventilation hoods of unnecessary equipment and chemical storage. We also noted a significant clean-up of expired and potentially dangerous hazardous materials at the science building bunker and the science labs. Keenan & Associates would like to congratulate the District on these efforts and path of continuous improvement.

This report contains a review of the District's chemical safety programs and lists general and site recommendations made to continue safe storage and container labeling of hazardous materials and waste. Recommendations are ranked by High, Medium, and Low priority. The ranking system is designed to assist college districts with prioritizing concerns and recommendations. The inventory should be carefully reviewed, and an in-house assessment should be conducted annually to minimize expired and unnecessary hazardous materials.

IX. PROGRAM REVIEW

Hazardous Communication

Priority:

Survey Findings:

The District has an effective Hazard Communication Program in place. Employees who manage or handle hazardous materials complete the Hazard Communication training. Employees utilize Keenan SafeColleges SDS to view/download/upload safety data sheets and create labels for their secondary containers.

As mentioned earlier, we are observing less unlabeled containers of hazardous materials. See Section XII for specific example(s) of containers that still require labeling.

Corrective Action:

Continue to label hazardous materials and waste in the proper manner.

Review the safety data sheets of the hazardous materials stored at each chemical storage area and provide an appropriate hazard rating/placard for each category on the NFPA signage. Ensure that safety data sheets are readily accessible to all employees.

Chemical Hygiene

Priority:

Survey Findings:

The District has a Chemical Hygiene Plan in place for the science labs. Science instructors and lab technicians receive training under the plan. As mentioned earlier, expired and potentially dangerous hazardous materials are identified by the District and properly disposed of. The science prep rooms and lab safety equipment are in good condition. Separate appropriate cabinets are provided for corrosives, oxidizers, and flammables. Due to COVID-19, lab safety equipment such as eyewash and deluge shower stations and ventilation hoods have not been inspected since March 2020. We did note that the minimization of storage in the ventilation hoods. This was most likely prompted by the campus shutdown but is a necessary precaution to take.

Corrective Action:

Continue to annually review the inventory for expired and unnecessary chemicals that still need to be properly disposed.

Hazardous Waste

Priority:

Survey Findings:

Hazardous waste is appropriately stored and labeled at most District locations. The District schedules a hazardous waste pickup with an environmental service to dispose and/or treat hazardous waste, at least quarterly. Employees handling hazardous waste are required to take an annual training on hazardous waste management.

Corrective Action:

Continue to label and store hazardous waste appropriately.