



Hazardous Materials Inventory

July 2022

Alvord Unified School District

Presented by:

Brent Chavez, Account Executive
Sendy Lucio, Account Manager
Dianna Poulin, Director, Loss Control

4204 Riverwalk Pkwy., Suite 400
Riverside, CA 92505
(951) 715-0190

Introduction

Keenan's Hazardous Materials Services are designed to assist clients with regulatory compliance and overall program management while also improving safety for staff, students and visitors.

Hazard Materials Inventory (HMI)

The HMI is the core component of Keenan's Hazardous Materials Services. The HMI incorporates the latest in inventory technology to produce accurate, manageable hazardous materials data.

A Keenan HMI specialist will visit each owned/operated site where hazardous materials are stored. The HMI specialist will inventory all hazardous materials in the locations identified by the client at the time of the service.

Areas typically inventoried include, but are not limited to the following:

- Science
- Biology
- Chemistry
- Chemical storage
- Art
- Physics
- Jewelry
- Photography
- Ceramics
- Theater
- Wood shop
- Metal shop
- Auto shop
- Home economics
- Scene shop
- Grounds
- Print shop
- Pool
- Food service
- Transportation
- Warehouse
- Custodian storage
- Paint storage
- Waste storage

However, the areas inventoried are to be dependent upon the directions, limitations, and requests of any District chaperone during the Keenan HMI specialist's on-site visit. Additionally, this is dependent upon these areas being readily accessible at the time of the on-site visit.

The Keenan HMI makes use of cutting-edge mobile technology ensuring that all data is captured efficiently and accurately. During the HMI process, the Keenan HMI specialist may attach unique bar code labels to some hazardous materials containers. These unique labels increase the efficiency and accuracy of Keenan's inventory and reconciliation process. The labels are always applied in a manner that does not obstruct or interfere with any manufacturer labeling.

Whenever available, the following data will be collected for each inventoried hazardous material:

- Manufacturer name
- Chemical name
- Common name
- CAS number
- Container type
- Unit of measure
- Container size
- Number of containers
- Hazardous material type
- Acutely hazardous material
- DOT hazard class
- Pressure
- Physical state
- Unique or nonunique barcode

Upon completion of the field inventory, a comprehensive HMI report will be made available to the client through the Keenan P&C Bridge. The HMI report contains the following:

- Findings and recommendations related to hazardous conditions observed during the inventory and organized by priority (i.e., immediate, high, medium, or low)
- An administrative review of the client's existing hazardous materials related programs
- A complete list of hazardous materials that were observed at the time of the inventory, organized in a three-tier location hierarchy (i.e., district, site, area)
- A listing of any observed extremely hazardous substances (EHS)

Safety Data Sheet On-Line Management Tool

Upon completion of the field inventory and the HMI report, the client will be provided access to a web-based Safety Data Sheet (SDS) management tool. The SDS tool will be pre-populated with the client's HMI and the location data obtained during the most recent inventory. The SDS tool is typically updated in subsequent contract years through an automated sync process.

Clients have the option to scan and upload, attach as a PDF, or download SDS from a robust repository. Keenan also makes every effort to pre-match as many SDS sheets as possible. Any pre-matched SDS will be automatically uploaded to the client's SDS tool during the automated sync process; however, Keenan makes no guarantee as to the percentage or quantity of SDS that will be pre-matched during the HMI and sync process. Clients are provided with an exception list that defines all inventoried hazardous materials that were not pre-matched during the sync process.

Clients have the ability to create virtual binders (collectives) in the SDS tool. Collectives can be useful when like-chemicals are found in multiple locations. Clients can also create secondary container labels, printable NFPA posters, and hard copy SDS through the management tool. Client access to the SDS tool will terminate 12 months following the expiration of the client's HMI contract.

California Hazardous Material Inventory (included):

California and local agencies may impose thresholds and/or requirements on how organizations store items that possess items California, and/or the local agency identifies as hazardous materials.

In California, an organization that possesses items identified as hazardous materials, in amounts greater than or equal to the state-defined thresholds, is required to submit a Hazardous Materials Business Plan ("HMBP") in the California Environmental Reporting System ("CERS"). California standard hazardous material defined thresholds are:

- fifty-five (55) gallons of a liquid,
- two hundred (200) cubic feet of a compressed gas, and
- five hundred (500) pounds of a solid.

However, California may apply thresholds that differ from the above, known as exemptions. In such instances, Keenan will adhere to the exemptions. California may amend such thresholds at any time.

Keenan will only provide its services and products as they pertain to the California statewide requirements.

Description of Services and Products Included:

Keenan will assist the Client with their existing HMBP in CERS. Updating an existing HMBP involves updating three (3) primary sections titled (1) Facility Information, (2) Hazardous Materials Inventory, and (3) Emergency Response and Training Plans in CERS.

1. Facility Information: Keenan will work with the Client to review and update “Business Activities” and “Business Operator/Owner Identification” sections in CERS. Examples of information that will be provided by the Client and input by Keenan per the Client’s direction:
 - Business Activities Section
 - EPA Id and general site information (name and address)
 - General question regarding Hazardous Materials, Underground Storage Tank(s)(UST), Hazardous Waste, Excluded and/or Exempted material, Aboveground Petroleum Storage, and Regulated Substances.
 - Business Operator/Owner Identification Section
 - Site Address and general Identification which includes general contact and Facility/Site Mailing Address.
 - Detailed Identification includes Owner Contact, Billing Contact, Primary Emergency Contact, Secondary Emergency Contact, and Environmental Contact.
2. Hazardous Materials Inventory: Keenan will assist the Client by updating the CERS inventory in accordance with any typical CUPA requirements and then uploading a draft for the Client’s review into CERS system. If Keenan has conducted a chemical inventory for the submittal year, then Keenan will prepare a draft CERS inventory, and upload such draft, with the following types of chemical information:
 - Chemical Identification and Physical Properties;
 - Chemical Hazard Classification includes classing Fire Code, Department of Transportation and Federal Hazard Categories;
 - Inventory Location and Quantity;
 - Inventory Storage Information; and
 - Mixture Components if needed.

Keenan will also assist the Client with marking basic map(s) per typical CUPA requirements. Map(s) must be provided by the Client.

3. Emergency Response and Training Plans: This section has two (2) parts, first, the CERS Emergency Response Contingency Plan template and, second, the Training Plan section of the Emergency Response Contingency Plan template. Keenan will assist the Client with completing CERS Emergency Response Contingency Plan template. The completion of the Training Plan section will be completed by the Client and Keenan will advise on how to complete this section.

NOTE: All steps referenced herein, and any work completed by Keenan shall be left in draft form. The Client is ultimately responsible for reviewing all drafts, ensuring the accuracy and completeness of the information, and finally, submitting this information to CERS and any other required organization.

Local CUPA Requirements (not included):

In addition to the above California requirements, organizations that possess the items identified as hazardous materials may be held to higher thresholds, additional or different requirements or protocols, identified by their local Certified Unified Program Agency (“CUPA”).

Keenan can assist with local CUPA requirements at an additional hourly rate as referenced in the fee section below should the Client wish to engage Keenan on such services or products. The Client understands and acknowledges that Keenan will not provide any services as they pertain to any local CUPA requirements above and beyond the State requirements, as part of the standard HMI fee proposed below.

Fee Summary

Keenan proposes to provide the above-outlined Hazardous Materials Compliance Program to the Alvord Unified School District for a fee of \$24,288.00 annually. Additional services (i.e., additional regulatory training, compliance plan assistance, local CUPA requirement assistance, etc.) can be provided at \$184.00 per hour.

The following client sites will be inventoried:

- Alvord High School
- Arizona Middle School
- Arlanza Elementary School
- Child Nutrition Center
- Christa McAuliff Elementary School
- Collett Elementary School
- District Office
- Food Service Center
- Foothill Elementary School
- Hillcrest High School
- Instructional Support Services
- La Granada Elementary School
- La Sierra High School
- Lake Hills Elementary School
- Loma Vista Middle School
- Myra Elementary School
- Norte Vista High School
- Orrenmaa Elementary School
- Parent Engagement Center @ Arlanza Elementary
- Philip M. Stokoe Elementary School
- Promenade Elementary School
- Rosemary Kennedy Elementary School
- Student Service Center
- Terrace Elementary School
- Twinhill Elementary School
- Valley View Elementary School
- Villegas Middle School
- Wells Middle School

Fees include:

- Professional Time
- Preparation and Scheduling
- Travel Time
- Follow-up Analytical Report
- Clerical Support/Word Processing
- All Expenses Associated with Program

Keenan's Hazardous Materials Compliance Program services are intended to help clients identify and mitigate hazards and potential Hazardous Materials exposures. While we are confident that our services will help our clients create a safer environment, we do not represent or guarantee that we will be 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.