

**LOS ANGELES UNIFIED SCHOOL DISTRICT**  
Office of Environmental Health and Safety  
Chemical Product Evaluation

**BACKGROUND**

This procedure establishes an evaluation process for all chemical products before they can be purchased and used by District staff including school-based staff and students, Maintenance and Operations (M & O), contractors, and/ or volunteers. No chemical product may be purchased or used without first verifying if the product was reviewed and approved for use by the Office of Environmental Health and Safety (OEHS). There are over 8000 products that have been reviewed by OEHS. The list of all products evaluated and associated restrictions on use are listed on the OEHS website (<https://achieve.lausd.net/Page/18094>) under “Chemical Product Review.”

Only LAUSD staff with an LAUSD email may request OEHS to conduct an evaluation for the chemical product. Those submitting a request for review will be referred to as “the requestor”. The requests shall be vetted by the following prior to submitting them to OEHS: Facilities Services Division which include Design Standards, Technical Services, Owner Authorized Representatives (OARs), Pest Management, Procurement, and the school-based personnel. School-based submittals from plant managers, administrators, teachers, and/ or used by students shall first consult the designated Complex Project Managers or Procurement for assistance. Requests will only be accepted from an LAUSD representative and are not accepted from individuals, contractors, vendors, or manufacturers.

**GENERAL REQUIREMENTS**

The requestor must submit an evaluation request to OEHS for each chemical product that has not been previously evaluated prior to purchase or use of the product. The “Chemical Product Evaluation Form” link is available on the OEHS website (<https://achieve.lausd.net/Page/18094>). The online request form must be completed and submitted to OEHS along with an electronic copy of the manufacturer’s most recent Safety Data Sheet (SDS) (approximately 2-3 years old with 16 sections). In addition, the following documentation might be helpful to include: technical sheet, product label, picture of the product, and any other documents. This must be submitted for each chemical product to be reviewed.

OEHS requires that the SDS must fully disclose all hazardous ingredients. Items listed as trade secret or proprietary can be submitted separately. If the SDS does not specifically address ingredients listed on California’s Proposition 65 or does not comply with the OSHA regulations, then the District will accept a letter from the manufacturer disclosing that information. The letter must be on the manufacturer’s letterhead and signed by a competent person from the manufacturing company. If needed, a Non-Disclosure Agreement (NDA) between the District and the manufacturer can be initiated in order to expedite the completion of the product review.

## EVALUATION PROCESS

Requests are sent to OEHS electronically. All new requests are listed on the OEHS website (<https://achieve.lausd.net/Page/18094>) as PENDING REVIEW until final determination has been made for an approval or disapproval. All products are placed into a product class, such as adhesives, pesticides, custodial cleaners, hand sanitizers, nursing supplies, etc., so that users may search for multiple approved options on the OEHS website.

In addition, the OEHS review team will also determine in some cases, if a product is an "Article" and if the OEHS review is warranted. OSHA's Hazard Communication Standard (HCS) definition of "**Article**" means "a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees." 29 CFR 1910.1200(c).

Many factors are taken into consideration when evaluating whether a product will be approved. The intended user is critical to this process. A product that would be approved for a construction worker would likely not be approved for use by students. The physical and chemical characteristics are reviewed as well as toxicity and carcinogenicity. The method of application (e.g. sprayed on versus rolled on, or poured) may also be considered especially when determining restrictions on use. The District may impose restriction for the use of a product. Examples of restrictions can include indoor or outdoor use only, cannot be used during school hours when students are potentially present, cannot be used until cure times are complete for playground and turf installed products, use of this product can be used in construction regulated area(s), contractor or M & O may only use this product, etc. OEHS may also mandate personal protective equipment such as respirators, protective gloves, safety glasses and coveralls and follow the manufacturer's recommendations.

Pesticides require an additional secondary layer approval process that includes the Integrated Pest Management committee's approval. All ingredients, including the inert or non-hazardous components, must be disclosed. The requestor must submit the product label, manufacturer's specification sheet and verification that the product is a registered pesticide by the EPA. Once OEHS has completed the preliminary evaluation, the product is presented to the Integrated Pest Management Committee for consideration. The committee will ultimately vote on whether the product be added to the LAUSD approved pesticide list. All pesticide use is restricted to LAUSD Pest Control Technicians. Contractors must request the use of approved pesticide products by first contacting the Facilities Pest Management Department prior to use of any pesticide. Note: The District does not allow the use of herbicides.

## **APPROVAL PROCESS**

The results of all evaluations are posted on the OEHS website as “APPROVED” OR “DISAPPROVED.” If a product is still under review, it will be listed as “PENDING”. An e-mail notification will be sent to the requestor notifying them of the results of the evaluation and any related restrictions. Once a product has been approved, the associated SDS is uploaded into MSDS Online which can be access from the OEHS website (<https://achieve.lausd.net/Page/18094>) by the public and District personnel.