

Hazard Communication Program

University of San Diego

1. Introduction and Purpose

The University of San Diego is firmly committed to providing each of its employees a safe and healthy work environment. The purpose of this Hazard Communication Program is to implement the provisions of General Industry Safety Order, Title 8, Section 5194 and 29 CFR 1910.1200.

OSHA regulations require employers to establish an effective Hazard Communication Program to transmit information on the hazards of chemicals to their employees by means of a written plan, training programs, labels on containers, and Material Safety Data Sheets. Implementation of a Hazard Communication Program will guarantee all employees the “right-to-know” the hazards and identities of the chemicals with which they work, and will reduce the occurrences of chemical-related occupational illnesses and injuries. The University of San Diego’s Hazard Communication Program is designed to:

- Reduce the likelihood of injury or illness to employees by implementing specific procedures to identify and evaluate the chemical hazards in the workplace.
- Inform and train employees on those hazards.
- Ensure that all individuals at risk are adequately informed about the chemicals used and stored in their workplaces.
- Outline procedures for all employees working with hazardous chemicals.

The following documents were used in the preparation of this Hazard Communication Program.

- California Code of Regulations, Title 8, Section 5194, “Hazard Communication”, and Appendices.
- Code of Federal Regulations 29 CFR 1910.1200, “Hazard Communication”.
- Employer’s Guide to the California Hazard Communication Regulation, published by the State of California Department of Industrial Relations Division of Occupational Safety and Health.

2. Scope

2.1 Operations Covered

This program covers all operations where hazardous chemicals are used or handled by employees with the following exceptions:

Exceptions:

- Laboratory operations are detailed in the University of San Diego Consolidated Chemical Hygiene Plan and are not included in this Hazard Communication Program.
- Warehousing, or other similar operations, where employees only handle substances in sealed containers which are not opened under normal conditions of use are exempted from most of the requirements of this program. These areas must keep labels intact on the containers, maintain copies of material safety data sheets available to all workers on all shifts, and ensure employees receive information and training to the extent necessary to protect them in the case of a leak or a spill.

2.2 Substances Covered

This program covers all hazardous chemicals which are used at the University of San Diego, with the following exceptions:

Exceptions:

- Hazardous wastes.
- Tobacco or tobacco products.
- Wood or wood products.
- Articles
- Foods, drugs, or cosmetics intended for personal consumption.
- Retail food sale establishments and all other retail trade establishments.
- Consumer products.

3. Responsibilities

3.1 Hazard Communication Coordinator

The Environmental Health and Safety (EH&S) Office will be responsible to act as the overall Hazard Communication Program Coordinator. In this role, EH&S will be responsible to:

- Administer the University Program, including auditing the effectiveness of the program on a recurring basis.
- Maintain each Department's hazardous chemical inventory and ensure that Material Safety Data Sheets are obtained for each chemical on the list. Assist Departmental Hazard Communication Managers with reviewing the MSDS and evaluating each chemical's potential hazards.
- Provide Departmental Hazard Communication Managers with a "Train the Trainer" course to assist them in training individual employees.
- Coordinate the exchange of Hazard Communication information with contractor personnel.

3.2 Departmental Hazard Communication Managers

Each Department will assign a primary and alternate Hazard Communication Manager to implement the program within their department. These managers will be responsible to:

- Prepare a departmental hazardous chemical inventory and provide it to EH&S. Provide monthly updates to EH&S as the inventory changes.
- Review the MSDS for each chemical on the inventory to evaluate each chemical's potential hazards. IF necessary, obtain technical assistance from EH&S.
- Attend a "Train the Trainer" workshop and conduct Hazard Communication training for any new employees or current employees whose duties may have changed the hazards of their work. Provide documentation of Hazard Communication training to EH&S.
- Ensure any hazardous chemicals that arrive at the Department are properly labeled. Coordinate with EH&S if they are not.

3.3 Employees

- Attend Hazard Communication training classes and become familiar with the MSDS for chemicals in their immediate workplace.
- Become familiar with and implement protective measures such as wearing the associated personal protective equipment for handling those chemicals.

3.4 Contractors

- Contractors are responsible for developing and implementing their own Hazard Communication Program requirements.
- Inform University of San Diego personnel of chemical hazards for materials that they bring onto the University.
- Provide access to MSDS for materials they bring onto University property.

4. Hazard Determination

All hazardous chemicals used and/or stored at University of San Diego are purchased materials. There are no manufactured or intermediate hazardous chemicals. Therefore, University of San Diego relies on the hazard determination made by the chemical manufacturer.

5. Chemical Inventories

Each Department will maintain a copy of their chemical inventory, update it on a monthly basis, and provide updates to EH&S. The inventories will minimally include the name of each chemical, using an identity that is referenced on the MSDS and label. Inventories should also include the manufacturer's name, amount on-site, and container size. EH&S

will maintain copies of every Departments' chemical inventories. As updates are provided, EH&S will ensure copies are filed into the appropriate Departmental Hazard Communication Programs. Departmental Hazard Communication Programs are filed as supplements to this master program.

6. Material Safety Data Sheets

The purpose of an MSDS is to provide safety data about a specific chemical substance. A manufacturer or importer must generate an MSDS for each chemical covered by the Hazard Communication Standard. While the format for an MSDS is optional, it must be in English. The identity listed on the MSDS must allow cross-reference between the MSDS, chemical inventory, and label.

6.1 Location of MSDS

Material Safety Data Sheets are kept on file at the EH&S office. MSDS are also available in secondary locations in the individual work areas.

Employees on all shifts have access to the Departmental MSDS files.

6.2 Purchasing Procedures

At least one copy of an MSDS must be supplied by the manufacturer or importer to each purchaser of a hazardous chemical with their first purchase, plus at least one copy of any subsequent revision of the MSDS.

If an MSDS is not received or otherwise available, the Hazard Communication Coordinator (EH&S) will request one from the manufacturer. Supervisors will verify that an MSDS is available prior to the use of any new chemicals in their Department.

6.3 Incorrect MSDS

Manufacturers or importers are required to replace out of date or incorrect MSDS. The responsibility for the accuracy of the MSDS information rests solely with the originator of the MSDS. However, if an error is discovered by the user, the originator, whose name and address must be listed on each MSDS, should be notified.

7. Labeling

7.1 General Requirements

A label identifying the contents and providing a hazard warning will be affixed to all containers of hazardous chemicals which could pose a physical or health hazard to exposed employees in the workplace. Appropriate labels are typically affixed by the chemical manufacturer or distributor. The label and hazard warning must be in English. To assist non-English speaking employees to understand the hazards associated with the substances with which they work, the labels and hazard warnings may be provided in the appropriate

foreign language in addition to those in English. The identity of the chemical, as listed on the label, must allow cross-reference between the label, the MSDS, and the chemical inventory.

7.2 Inspection of Incoming Containers

Chemical manufacturers and importers are required to label containers of chemicals they sell. When received, each container of a hazardous chemical will be:

- Clearly labeled as to contents.
- Clearly labeled with manufacturer's name and address.
- Clearly labeled with appropriate hazard warning.
- If the hazardous substance is regulated by a substance-specific health standard, the label must meet the specific requirements of that standard.

All containers should be inspected to ensure correct labeling. Containers that do not conform to the above requirements will be brought to the attention of the manufacturer or supplier with a request for replacement labels. The purchaser of the chemical will make this notification to the vendor and apply appropriate labeling prior to distribution of the chemical to end-users.

7.3 Secondary Containers

Hazardous chemicals may be transferred from the primary container in which they were originally received, such as a 55-gallon drum, into a secondary container for more convenient use.

Secondary containers of hazardous chemicals that are used by more than one person or for longer than one work shift will be labeled with a copy or facsimile of the original manufacturer's label.

Regardless of where they are used, containers into which hazardous chemicals have been transferred for use during a single work shift solely by the person performing the transfer do not need to be labeled; however, labeling of these containers is strongly encouraged as a good operating practice.

8. Training

All potentially exposed employees must be given training in the safe handling and use of the hazardous chemicals with which they normally work or may be exposed to during a foreseeable accident. It is important that the training be appropriate to an employee's educational background, linguistic abilities, and the specific circumstances of each work area.

Training must be given to any new employees at the time of their initial job assignment and then whenever a new hazard is introduced to the job. Training will be conducted and documented by the Departmental Hazard Communication Manager. Copies of training documentation will be given to the Hazard Communication Coordinator (EH&S) and kept on file. The Hazard Communication Coordinator will provide “Train the Trainer” instruction to the Departmental Managers.

9. Trade Secrets

Manufacturers and importers may withhold the specific identity of a chemical based on the provisions in 8 CCR 5194 provided they disclose the properties and effects of the chemical. They must disclose the identity of the specific chemicals in the event of a medical emergency or upon receipt of a written request sufficiently detailing the need for the information.

10. Non-Routine Tasks

Exposed employees required to perform non-routine tasks involving the use of hazardous chemicals (such as might occur during a temporary assignment to a different job) will be provided MSDS information about the hazards of the new task. Where appropriate, additional instruction and training by their supervisor.

Non-routine tasks conducted by employees in each department must be listed and filed in their Departmental Hazard Communication Program. Departmental programs are maintained as supplements to this master program.

11. Unlabeled Pipes

Exposed employees required to perform tasks involving potential exposure to chemicals contained in unlabeled pipes will be provided, prior to the commencement of this activity, MSDS information about the hazards of those chemicals and additional instruction and training by their supervisor.

12. Contractor Communication

All contractors are required to provide hazard information pertaining to the chemicals that they may be bringing onto University of San Diego property during the duration of their work if there is a possibility that USD employees may be exposed to those chemicals. Conversely, USD must provide safety information to contractors and their employees regarding potential exposures to hazardous chemicals present in the areas in which they will be working.