

# Hazard Communication Program

## University of San Diego

Effective September 30, 2013

### 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 (Adopted May 6, 2013) and 29 CFR 1910.1200 (Effective May 25, 2012).

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 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, adopted May 6, 2013.
- Code of Federal Regulations 29 CFR 1910.1200, “Hazard Communication”, effective May 25, 2012.
- Guide to the California Hazard Communication Regulation, revised/updated May 2012, published by the Cal/OSHA Consultation Service, Education Unit, California Department of Industrial Relations.
- University of San Diego Hazard Communication Program, June 22, 2000.

A copy of the California standard, its appendices, and the Guide to the California Hazard Communication Regulation are included in an Appendix.

## **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 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 (excluding processing and repair work areas).
- Consumer products.
- Use of substances in compliance with the Director of the Department of Pesticide Regulation, pursuant to section 12981 of the California Food and Agricultural Code.

## **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.
- Keep copies of each Department's chemical inventory.
- Assist Departments in obtaining Safety Data Sheets for each item on the inventory.
- If requested, assist Departmental Hazard Communication Managers/Supervisors with reviewing the SDS and evaluating each material'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 chemical inventory and provide it to EH&S.
- Provide monthly updates to EH&S as the inventory changes.
- Obtain SDS for each item on the inventory.
- Review the SDS for each material 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 materials 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 SDS for hazardous materials in their immediate workplace.
- Become familiar with and implement protective measures such as wearing the associated personal protective equipment for handling those materials.

### **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 SDS for materials they bring onto University property.

## **4. Hazard Determination**

All hazardous materials 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 SDS 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. Safety Data Sheets**

The purpose of an SDS is to provide safety data about a specific hazardous material. A manufacturer or importer must generate an SDS for each material covered by the Hazard Communication Standard. The SDS must be in English and include the section numbers, headings, and associated information under each heading in the order listed in Appendix B. The identity listed on the SDS must allow cross-reference between the SDS, chemical inventory, and label.

### **6.1 Location of SDS**

Safety Data Sheets are kept on file in each Department. Specific locations of SDS within each Departments are listed in the Departmental Hazard Communication Programs, in Appendix G. As a back-up to the hard copies, EHS maintains an electronic (scanned) version of each SDS in the EHS laptop computer.

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

## **6.2 Purchasing Procedures**

At least one copy of an SDS 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 SDS.

If an SDS is not received or otherwise available, the Departmental Hazard Communication Manager or Supervisor will request one from the manufacturer within seven days of receipt of the material. This can be done by filling in the form located at Appendix C and faxing, emailing, or mailing it to the manufacturer. Supervisors will verify that an SDS is available prior to the use of any new chemicals in their Department. The Departmental Hazard Communication Manager or Supervisor may also attempt to obtain an SDS via an internet search. If obtaining SDS via an internet search, it is very important to verify that the obtained SDS is from the same manufacturer as the material on hand. EHS is available to assist if needed and requested by the Departmental Hazard Communication Manager or Supervisor.

## **6.3 Incorrect SDS**

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

- Product identifier. The product identifier, as listed on the label, must allow cross reference between the label, the SDS, and the chemical inventory.
- Signal word;
- Hazard statement(s);
- Pictogram(s);
- Precautionary statement(s); and

- Name, address, and phone number of responsible party (manufacturer, distributor, or importer).

Labels may not be removed or defaced, unless the container is immediately marked with the required information.

## **7.2 Labeling Exemptions**

Substances exempt from the above labeling requirements are:

- Any substance already exempt from the Hazard Communication Program, as listed in section 2.2.
- Any properly labeled food, food additive, color additive, drug, cosmetic, medical device, veterinary device, pesticide, beverage alcohol, and wine or malt beverage.

## **7.3 Inspection of Incoming Containers**

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.

## **7.4 Transfer Containers**

Hazardous chemicals may be transferred from the primary container in which they were originally received into a portable container for more convenient use.

Transfer 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 of the original manufacturer label, or a locally-produced label containing the information listed above in section 7.1.

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 management practice.

## **8. Training**

All potentially exposed employees must be given training in the safe handling and use of the hazardous chemicals in their work area. 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 will include at least the following topics:

- The requirements of the California-OSHA Hazard Communication Standard.

- Operations in the work area where hazardous chemicals are present.
- Location and availability of written hazard communication program, chemical inventory, and SDS.
- How to detect the release of a hazardous chemical.
- Physical and health hazards of chemicals in the work area.
- Measures to protect themselves from chemical hazards in the work area.
- Procedures USD has implemented to protect workers from chemical hazards, such as work practices, emergency procedures, and personal protective equipment.
- Details of this Hazard Communication Program.
- Explanation of labeling system.
- Explanation of SDS and how to obtain and use hazard information.
- Employee rights:
  - To receive information regarding hazardous substances to which they may be exposed;
  - For their physician or bargaining agent to receive such information;
  - Against discharge or discrimination due to exercising of such rights.

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 Hazard Communication Managers and Supervisors.

Training will be conducted using the curriculum and documentation procedures outlined in Appendix F.

## **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 SDS information about the hazards of the new task and. 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, SDS 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 USD property during the duration of their work if there is a possibility that USD employees may be exposed to those chemicals. Contractors will provide SDS to EHS for any hazardous chemicals they bring onto USD property. 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.