Hazard Communication Program

Prepared for:
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Abbreviations

The following abbreviations have been used in the body of this written program:

- Cal/OSHA - California Occupational Safety and Health Administration
- CCR - California Code of Regulations
- EHS – Environmental, Health and Safety
- GISO - General Industry Safety Orders
- MSDS – Material Safety Data Sheet
- NIOSH – National Institute for Occupational Safety and Health
- OSHA - Occupational Safety and Health Administration
- PPE - Personal Protective Equipment
- SDS - Safety Data Sheet
Introduction and Scope

Sonoma State University has developed this Hazard Communication Program to comply with Section 5194 of Title 8 of the California Code of Regulations. This regulation requires the development of a written hazard communication program describing how employees will be informed of chemical hazards through the use of labels, safety data sheets and training. This program covers Sonoma State University employees and operations located in California, with the exception of employees working in laboratories. Laboratory operations are governed by Sonoma State University’s Chemical Hygiene Program.

This program includes hazardous substances in the workplace that employees may be potentially exposed to under normal conditions, non-routine activities, or in a foreseeable emergencies resulting from workplace operations. This written program is divided into the following sections:

• Program Responsibilities
• Hazard Identification
• Label Requirements
• Safety Data Sheets
• Chemical Inventory Management
• Training
• Non-routine Tasks
• Contractors
• Proposition 65 Applicability

Sonoma State University provides information about chemical hazards to employees and contractors via this written Hazard Communication Program which includes:

• Methods used to track chemical inventory to ensure an appropriate safety data sheet is available for every chemical used in the workplace
• Methods describing how employees will be notified of chemical hazards associated with non-routine tasks
• Methods used to inform contractors of hazardous chemicals that may be present in their work areas while performing tasks at Sonoma State University

This written program is available upon request to any Sonoma State University employee, their designated representative(s), California Occupational Safety and Health Administration, and the federal Occupational Safety Health Administration (OSHA), in accordance with the above referenced regulatory citations. No employee will be discharged or otherwise discriminated against for exercising rights afforded by this program.

A copy of this program is available on Sonoma State University EHS Department Intranet website.
Hazard Communication Responsibilities

Executive Management

The ultimate responsibility for providing a safe, healthful and environmentally responsible workplace rests with the employer. Sonoma State University’s Executive management recognizes this responsibility and is committed to providing the resources necessary to achieve this goal. The Vice President of Administration and Finance has been assigned Executive Management responsibilities of Environmental, Health, and Safety (EH&S) for Sonoma State University’s operations and will appoint persons responsible for carrying out these aspects.

Director of Environmental Health and Safety

Sonoma State University’s Director of Environmental Health & Safety is tasked with the development and implementation of Environmental Health & Safety (EH&S) programs for Sonoma State University. The Director of Environmental Health & Safety’s responsibilities under the Hazard Communication Program include:

- Provide the resources to maintain the operation of the MSDSOnline™ database system to manage Safety Data Sheets for all chemicals purchased by Sonoma State University
- Provide guidance on identifying chemical hazards and appropriate hazard controls
- Ensure all affected employees are provided training on the general elements of this Hazard Communication Plan

Department Heads

Department Heads have the best understanding of chemical usage and associated hazards for the operations they oversee. Based on this, they have the following responsibilities:

- Maintain accurate chemical inventories for their department
- Review Safety Data Sheets for new chemical products prior to purchase
- Upload Safety Data Sheets to Sonoma State University’s MSDSOnline™ database
- Provide department employees with access to Safety Data Sheets for all hazardous materials used in their department
- Ensure employees receive training on specific chemical and physical hazards in their work area
- Provide employees with appropriate personal protective equipment
- Ensure all employees receive training on the care and use of personal protective equipment
• Ensure employees comply with the requirements of this program, including proper use of personal protective equipment

• Ensure employees are trained to label all chemical containers properly

• Adequately inform any non-University personnel sharing the same work area of the hazardous materials to which their employees may be exposed while performing their work

• Maintain documentation demonstrating that all department employees have received training required by this program

Employees
All Sonoma State University employees are responsible for:

• Actively participating and completing required hazard communication training

• Familiarizing themselves with Safety Data Sheets and other information on chemicals in their work area

• Reading and understanding the hazards of the chemicals in their work area

• Reading and understanding the labels on the chemical containers that they are handling

• Storing chemicals properly

• Properly labeling containers that do not display chemical manufacturer labeling

• Wearing required personal protective equipment (PPE)
Hazard Determination

Employers are required to identify and classify all of the hazards associated with chemical use in the workplace. Sonoma State University relies on Safety Data Sheets (SDSs) provided by chemical suppliers to identify and classify these hazards.

If the chemical contains a hazardous substance, it should be listed in the hazardous ingredients section of the SDS.

- If the chemical does not contain hazardous substances, then the hazardous ingredients section of the SDS is usually left blank, or contains a statement such as “No hazardous chemicals in material, or the chemicals present will be listed as non-hazardous”

Any mixtures containing 1% or more of a hazardous substance or 0.1% or more of a carcinogen are considered to be hazardous materials.
Labels

Cal/OSHA requires that chemical hazards be communicated to employees using labels on the hazardous material container. This can be performed in one of two ways:

- By not removing, altering or defacing chemical hazard warning labels on containers provided directly by the supplier
- Adding a label that includes the identity of the hazardous material and the primary hazard characteristics
  - Examples of primary hazard characteristics include: flammable, corrosive, toxic, poisonous, and reactive
  - The SDS of the hazardous material should be used to determine the primary hazards to be included on labels added by Sonoma State University employees

Upon arrival of chemical shipments or deliveries:

- The person receiving the chemical shipment is responsible for checking that the chemical containers are properly labeled with the manufacturer’s label
  - This applies to all chemicals from outside suppliers, including vendor trial substances

At Sonoma State University, primary containers of hazardous substances will be not used unless the following label information is present:

- Product name and chemical ingredients
- Pictogram that conveys specific information about the hazards of the chemical. Examples of the pictograms that may be present on labels are provided in Attachment A
- Appropriate hazard warnings
  - Signal word: a single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used can either be “Danger” or “Warning.” “Danger” is used for the more severe hazards, while “Warning” is used for less severe hazards.
  - Hazard statement: a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard
  - Precautionary Statement: a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposures to a hazardous chemical or improper storage or handling of a hazardous chemical
- Name, telephone number, and address of the manufacturer, importer, or other responsible party
The following is an example of an acceptable primary label:

**Sample Label**

![Sample Label]

**Secondary Containers**

To further ensure that employees are aware of the hazards of materials used in their work areas, Sonoma State University employees are required to label all secondary containers. Examples of secondary containers include spray bottles, pails, etc. Secondary containers must be verified compatible with the material to be transferred and may never be previously used food or beverage containers.

Secondary containers should be labeled with:

- The product name, as identified on the SDS for the material
- Primary hazards associated with its contents

Employees with questions regarding the proper in-house label to use, should contact their Department Head or the EHS Department prior to transferring the chemical from one container into another.

Department heads have the responsibility of ensuring that all chemical containers in their area(s) are properly labeled.

- All labels must be legible, in English and prominently displayed
- The name of the material that appears on the manufacturer’s label and the secondary label shall be the same as the name that appears in the chemical inventory as well as the SDS
- In the event that container labels are marred, missing or incorrect for any reason, it shall be the area supervisor’s responsibility to correctly label the container
- This policy does not require labeling of consumer products
Sonoma State University can use written materials such as signs, placards, process sheets, operating procedures or other written materials in lieu of affixing labels as long as the alternative method identifies the containers to which it is applicable and conveys the required information.

**Piping Labeling**

Above-ground pipes transporting hazardous substances (gases, vapors, liquids, semi-liquids, or plastics) shall be identified in accordance with Title 8 CCR, Section 3321, “Identification of Piping.”
Safety Data Sheets (SDS)

Every work area that uses hazardous materials must have, readily accessible to the employees, an SDS for every hazardous material used in the area. A Safety Data Sheet, previously referred to as a Material Safety Data Sheet (MSDS), needs to be on file for every hazardous chemical present at Sonoma State University.

- Access to SDS is provided either by the maintenance of hard copies of the SDS in a designated location by each department or by uploading SDSs to the MSDSOnline database and providing employee access to the database
- A copy of department’s chemical inventory will be maintained by the department head or his/her designee

SDSs will be accessible to all employees and contractors during each work shift.

- SDS shall also be made readily available, upon request, to the employee’s designated representatives or physician, in addition to NIOSH and Cal-OSHA

If any employee or contractor requests to see an SDS and it is not available, the department head will request the SDS from the manufacturer within 7 days.

If an SDS contains information listed as a trade secret, this information can be obtained, if necessary.

- In emergency situations, manufacturers, importers or employers are required to disclose, upon request, a specific chemical identity to a physician, nurse, industrial hygienist, safety professional, toxicologist, or epidemiologist who is providing medical or other occupational health services to exposed employees if the request is in writing

SDSs shall be retained for at least thirty years after the chemical is no longer in use.
Chemical Inventory

Updated chemical inventories are vital for confirming that SDSs are present for all chemicals in the workplace. A copy of each department’s hazardous material inventory is maintained by each department head.

For ease of reference hazardous materials should be listed alphabetically according to the manufacturer’s trade or common name and then the manufacturer name. The name on the inventory must match the name listed on the SDS. The inventory is to be updated by the department head on an as-needed basis.
Training

Initial Training

The Director of Energy/Environmental Health & Safety will ensure that training will be provided to all employees that are potentially exposed to chemical hazards on the Sonoma State University Hazard Communication Program at the time of program implementation and via New Hire Safety Orientation. This hazard communication training will include the following information:

- The requirements of the Hazard Communication Standard as defined in California Code of Regulations Title 8 General Industry Safety Orders (GISO) Section 5194
- The location and availability of the Sonoma State University written hazard communication program including the locations of chemical inventories, Safety Data Sheet hard copy files and the online Safety Data Sheet management system
- A description of job operations where hazardous chemicals are used or are present
- How to read and interpret the labels and pictograms used at Sonoma State University
- Typical hazards associated with non-routine tasks
- How to read and interpret information on a SDS
- Steps that employees can take to reduce exposure to hazardous chemicals, such as safe work practices, emergency procedures and the wearing of personal protective equipment
- The physical and health hazards of the hazardous chemicals, including the signs and symptoms of exposure and a review of exposure limit(s)
- Emergency and first aid procedures to follow in case of exposure to hazardous chemicals
- Methods that can be used to detect the presence of a hazardous chemical in a work area e.g., monitoring conducted by the employer, monitoring devices, visual appearance or odor of hazardous substances
- Employee rights:
  - To personally receive information regarding hazardous substances to which they may be exposed
  - To have their physician or collective bargaining agent receive information regarding hazardous substances to which they may be exposed
  - Not to be discharged or be discriminated against due to their exercise of the rights provided by the Labor Code

The initial hazard communication training will be documented using the Sonoma State University training sign-in log and maintained by the Director of Energy/Environmental Health & Safety.
On-the-Job Training

On-The-Job Training (OJT) will be provided by each specific Department:

- Whenever a new hazardous material is introduced into their work area
- Within 30 days of the employer receiving an updated SDS containing new information indicating significant increased risk or changes in the use of personal protective equipment

Refresher training will be completed if the written program is updated, or if a gap in employee knowledge is detected.

Before any new hazardous chemical is used, each employee will receive the necessary information on the chemical by his or her supervisor in the same manner as during the initial hazard communication training.
Non-Routine Tasks

Section 5194 (e)(B) requires hazard communications plans to specifically address non-routine tasks. A hazardous non-routine task is any task that an employee is not trained to perform, is not usually performed at a particular facility or due to its different or unusual nature, would require special training to safely perform. Experience has shown that the performance of non-routine tasks generally present a higher degree of risk than routine tasks.

- Examples of hazardous non-routine tasks include: Specialized maintenance work (electrical work, equipment repair, etc.); and chemical spill clean up

When required the department supervisor will conduct training concerning the hazards involved in a specific non-routine task.

- This training will include:
  - Specific chemical and physical hazards
  - Proper personal protective equipment
  - Additional safety measures such as lockout of electrical hazards, or the use of special engineering controls

- The non-routine task training shall be documented by the person providing the training
Contractors

To ensure that outside contractors work safely at Sonoma State University, it is the contractor’s and the appropriate Sonoma State University representative’s responsibility to ensure that the contractor is aware of hazardous operations and chemicals in the area that they will be working in.

The Sonoma State University contact for the contractor is to provide the following information to the contractor:

- Identity of hazardous substances that may be present in the area where the contractor may be working
- Precautions that may be taken; such as the use of personal protective equipment, to reduce or prevent exposure to hazardous chemicals
- Emergency procedures to be followed in case of an emergency such as a building evacuation, fire, chemical spill, injury or illness
- Location where the written hazard communication program and SDS are kept and how to access said information
- Information about the labeling system used at Sonoma State University

If the contractor brings chemicals on site, it is the contractor’s responsibility to have an SDS for each chemical with them at all times when on Sonoma State University premises, and any hazardous waste generated, must be removed at the end of each day.
Proposition 65

The State of California has generated a list of chemicals that it considers may cause cancer and/or reproductive harm and requires the public to be notified if they are potentially exposed to these chemicals.

- The chemical list is referred to as the Proposition (Prop) 65 list
- The Prop 65 list is located in Title 27 of the California Code of Regulations §25000-27001 (Safe Drinking Water and Toxic Enforcement Act of 1986)

California Health and Safety Code Section 25249.11 (b) exempts “the state or any department or agency thereof” from the obligation to comply with Proposition 65. Therefore, Sonoma State University does not provide warnings under Proposition 65.
Attachment A: Hazard Pictograms
<table>
<thead>
<tr>
<th>Health Hazard</th>
<th>Flame</th>
<th>Exclamation Mark</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Carcinogen" /></td>
<td><img src="image" alt="Flammables" /></td>
<td><img src="image" alt="Irritant" /></td>
</tr>
<tr>
<td>Mutagenicity</td>
<td>Pyrophorics</td>
<td>Skin Sensitizer</td>
</tr>
<tr>
<td>Reproductive Toxicity</td>
<td>Self-Heating</td>
<td>Acute Toxicity</td>
</tr>
<tr>
<td>Respiratory Sensitizer</td>
<td>Emits Flammable Gas</td>
<td>Narcotic Effects</td>
</tr>
<tr>
<td>Target Organ Toxicity</td>
<td>Self-Reactives</td>
<td>Respiratory Tract Irritant</td>
</tr>
<tr>
<td>Aspiration Toxicity</td>
<td>Organic Peroxides</td>
<td>Hazardous to Ozone Layer (Non-Mandatory)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Gas Cylinder</th>
<th>Corrosion</th>
<th>Exploding Bomb</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Gases Under Pressure" /></td>
<td><img src="image" alt="Skin Corrosion/Burn" /></td>
<td><img src="image" alt="Explosives" /></td>
</tr>
<tr>
<td></td>
<td>Eye Damage</td>
<td>Self-Reactives</td>
</tr>
<tr>
<td></td>
<td>Corrosive to Metals</td>
<td>Organic Peroxides</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Flame Over Circle</th>
<th>Environment</th>
<th>Skull and Crossbones</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Oxidizers" /></td>
<td><img src="image" alt="Aquatic Toxicity" /></td>
<td><img src="image" alt="Acute Toxicity" /></td>
</tr>
<tr>
<td></td>
<td>(Non-Mandatory)</td>
<td>(fatal or toxic)</td>
</tr>
</tbody>
</table>