



Hazard Communication Program

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PURPOSE

All employers in California are required to maintain a written Hazard Communication Program to inform employees about the dangers of all hazardous materials stored, used, and disposed of at their facilities. California State University, Dominguez Hills uses a variety of chemicals and hazardous materials for maintenance, sanitation, and education. Employees must be trained to identify hazardous materials to understand labeling and to quickly obtain information about hazards.

Hazardous materials are defined and regulated by the U.S. Environmental Protection Agency, U.S. Occupational Safety and Health Administration, U.S. Department of Transportation, and U.S. Nuclear Regulatory Commission.

This program applies to all university departments, and their respective employees, that use or store hazardous substances. The program complies with state requirement to develop and implement a written hazard communication program. For laboratory settings, those affected colleges and departments shall follow the CSUDH Chemical Hygiene Plan.

- [Hazard Communication](#) (8 CCR § 5194)
- [Injury and Illness Prevention Program](#) (8 CCR § 3203)
- [Access to Employee Exposures and Medical Records](#) (8 CCR § 3204)
- [Identification of Piping](#) (8 CCR § 3321)

Inclusions

Any chemical that is purchased, stored, used, or disposed of at CSUDH or associated properties (such as the Prosthetics Lab) is included in this program.

Exclusions

The management of chemicals, such as restrictions for purchase, storage, retention, spills, and disposal requirements, are not addressed within the context of hazard communication. However, chemical management is addressed in several other CSUDH EHS policies including:

- Chemical Spill Cleanup Guidelines
- Intra and Inter-Building Laboratory Hazardous Substances Transportation Program
- Medical Waste Management Plan
- Oil Spill Contingency Plan
- Spill Emergency Response Plan
- Spill Prevention Control and Countermeasure Plan

These policies can be found on the EHS web page: <https://www.csudh.edu/ehs/>

Tenants of CSUDH are not included in this program. These include but are not limited to:

- Loker Student Union

- California Academy of Math and Science
- Dignity Sports Center

This policy shall not be used as a substitution for onboarding or training materials.

DEFINITIONS

Hazard Identification – hazards are identified based on the *National Fire Protection Association's* model code 704. Hazards are categorized by the level of flammability, health hazard, and stability. It also identifies substances with special hazards such as acids, oxidizers, or asphyxiants.

Hazardous Material – any substance which poses health or physical damage to humans or harm to the environment. It can be in the form of a liquid, dust, granule, gas, and other forms. Note: many regulatory agencies have individual criteria for what defines a hazardous material. Those definitions must be used when complying with laws governed by those agencies.

Hazardous Waste – a waste product with properties that make it dangerous to human health or the environment.

Primary Container – the container that is used when a hazardous material is packaged by the manufacturer. Sealed drums are an example of a primary container.

Secondary Container – this is a smaller container that Superior Farms' staff may use to store chemicals for ease of use and application. Spray bottles, pump sprayers, and buckets are examples of secondary containers.

Pictogram – A universal symbol used for hazardous material recognition. The picture will indicate a specific way that the material is harmful to human health or the environment and are located on the primary container as well as the safety data sheet. These pictograms are part of the Globally Harmonized System (GHS) which uses a world-wide set of descriptors to classify and label chemicals:



CORROSIVE



IRRITANT OR SENSITIZER



HEALTH HAZARD



ACUTE TOXICITY



FLAMMABLE



EXPLOSIVE



GAS UNDER PRESSURE



OXIDIZER



ENVIRONMENTAL TOXICITY

Safety Data Sheet – is a document that is generally created by the manufacturer of a hazardous material. It is a detailed description of the material's name, ingredients, and properties. It includes instructions for handling and storage, first aid, fire-fighting, and personal protection. It also explains the hazards to human health and the environment.

RESPONSIBILITIES

The Director of Environmental Health and Safety shall be the plan administrator. This person is responsible to review the program for effectiveness and to make revisions when necessary. However, without the active participation of every manager and team member, both the program and the information that must be communicated will fail. It is imperative that each of the following responsibilities are carried out routinely and in a timely manner.

Environmental Health and Safety

- Assist departments in setting up their online inventories through the *Risk and Safety Solutions* (RSS) application
- Monitor and periodically audit chemical inventories
- Provide hazard communication training for employees that regularly work with chemicals (such as custodial, trades, and applicable academic departments) and maintain training records
- Ensure that hazard communication training is provided to all applicable departments
- Review and update the policy annually
- Communicate chemical inventories, quantities, and locations to state and local agencies as required

Procurement and Contracts

Hazardous materials are purchased through *University Procurement and Contracts*. Procedures for restricted purchases are outlined on their web page: <https://www.csudh.edu/procurement-contracts/restricted-purchases/>. Unauthorized purchases or purchase requests must be flagged and redirected to Environmental Health and Safety for review and approval.

University Departments

Any university department that uses, stores, and disposes of chemicals is required to:

- Maintain a chemical inventory of all hazardous materials in the RSS system
- Submit SDS information for any new chemicals to EHS for review and approval before purchase
- Refuse receipt of any hazardous material that is not properly labeled or does not have an SDS
- When applicable, obtain copies of all SDS from contractors who bring hazardous material into the workplace
- Inform EHS immediately of any accidental release of a hazardous substance, regardless of quantity

Department Managers and Supervisors

- Provide hazard communication training for employees that regularly work with chemicals (such as custodial and trades) and maintain training records
- Provide training on the correct physical protective equipment (PPE) required for handling each hazardous substance
- Enforce the proper handling, transportation, and storage of hazardous substances by authorized employees
- Ensure that all employees are able to access safety data sheets (SDS) through RSS
- Properly label secondary containers with the name of the chemical and any associated globally harmonized symbol (GHS)
- Maintain best practices and do not re-use containers for a new chemical
- Refrain from using food containers (e.g. cottage cheese tub) for chemicals
- Review SDS with employees when new hazardous materials are introduced in the workplace
- Remove containers from use that are not labeled and tag as waste. Printable hazardous waste labels can be found on the EHS webpage <https://www.csudh.edu/ehs/environmental-compliance/hazardous-waste>
- Report unknown chemicals to the EHS department

Employees

Only designated and trained employees may handle a hazardous substance. They must:

- Complete assigned online training and attend in-person training
- Refrain from handling a hazardous substance unless properly trained and SDS has been reviewed
- Understand and use all PPE that is required for handling the substance
- Handle and store hazardous materials according to the SDS and provided training
- Label secondary containers with the name of the chemical and GHS symbol before use
- Never assume that you know the contents of an unlabeled container. If contents cannot be confirmed, tag it for disposal. Printable hazardous waste labels can be found on the EHS webpage and here: <https://www.csudh.edu/ehs/environmental-compliance/hazardous-waste>
- Immediately report any adverse exposure symptoms that occur

If employees work with or near a chemical and an SDS is not made available to you, they may contact the EHS department for assistance. If the hazardous substance is known to aggravate an employee's existing health condition, report the need for special accommodations to the human resources department.

CONTAINER LABELING

Primary Containers

All primary containers containing hazardous materials must be properly labeled by the manufacturer with the name of the chemical or material. Original containers received from the manufacturer, distributor, or importer must include:

- Product name
- Signal words
- Hazard statements
- Pictograms
- Precautionary statements
- Name, address, and telephone number of the manufacturer, importer, or other responsible party

Secondary Containers

Secondary containers used by all CSUDH departments/employees must:

- Be legible and in English (a secondary language may be included, when necessary)
- Contain product name or identifier (e.g. the identifier could be known as '*hand sanitizer*')
- Disclose appropriate hazard warnings (In the form of words, pictures, symbols, or combination)

All portable secondary containers will be dedicated to a single chemical and labeled with the appropriate information. The container may **not** be used again for another substance. If a label falls off, it will be the responsibility of the department manager to replace it. The container shall be removed from service until a new label is affixed. When a container is not labeled and its contents unknown, it must be properly discarded. The container may not be used again. Spray bottles containing water must be labeled as water (H₂O is acceptable).

Exception: Portable containers for immediate use during a single shift by a single employee who performs the transfer themselves are exempt from the labeling requirement.

Pipes

Above-ground pipes transporting hazardous chemicals (gases, vapors, liquids, semi-liquids, and plastics) shall be identified using one or more of the following methods:

- 1) Complete color painting of all visible parts of the pipe
- 2) Color bands, preferably 8 to 10 inches wide, at various intervals and at each outlet valve or connection.

Where identification is provided by complete color painting or by color bands, a color code shall be posted at those locations where confusion would introduce hazards to employees.

- The names of or abbreviations of the names of the materials transported shall be lettered or stenciled on the pipe near the valves or outlets.

- Tags of metal or other suitable material naming the material transported shall be fastened securely to the system on or near the valve. Tag legibility shall be maintained.

Before employees enter an area and initiate work on or near *any* pipes (including those that do not contain hazardous substances, such as steam, managers must inform them of:

- The location of the pipe or piping system or other known safety hazard
- The chemicals in the pipe
- Potential hazards
- Safety precautions

Hazardous Waste

When containers of hazardous waste are ready to be discarded, they must be labeled as hazardous waste with the name of the chemical and date. They must be disposed of within 180 days through Environmental Health and Safety. Existing labels on incoming containers of hazardous chemicals shall not be removed or intentionally defaced unless the container is immediately marked with the required information.

Universal Waste

Universal waste differs from hazardous waste in that it is considered lower risk and is less toxic, reactive, ignitable, or corrosive. Some universal waste does not require labeling: batteries, electronics, lightbulbs. These are recycled in locations throughout the campus. Other wastes such as un-empty aerosol cans, paint, motor oil, and glue must be labeled with a universal waste tag along with the date. Universal wastes are also disposed of through EHS.

CHEMICAL INVENTORY LIST

As with all California businesses, CSUDH is required to maintain an accurate chemical inventory of each chemical, quantity, and storage location stored on the campus. The chemical inventory shall include the following information:

- Product identifier (i.e. the chemical name that is reference on the SDS)
- Location/work area where chemicals are used/stored
- Current quantity

Department managers shall maintain an up-to-date hazardous chemical inventory list at all times. This requires cooperation and communication with every department on campus.

No hazardous material is authorized for use until it is placed on the inventory and a safety data sheet uploaded to RSS. The EHS department cannot surveil whether new hazardous materials are brought onto campus. This is the responsibility of all managers who intend to purchase or use hazardous materials.

SAFETY DATA SHEETS

Safety Data Sheets (SDS) are detailed documents that outline the hazards associated with a specific chemical or substance. The SDS is provided by the manufacturer and is comprised of 16 specific environmental and health information about that chemical [Hazard Communication](#) (8 CCR § 5194).

Archived Records

Safety Data Sheets or chemical inventories resulting from an employee exposure to a hazardous or toxic substance are required to be maintained for a period of 30 years [Access to Employee Exposures and Medical Records](#) (8 CCR § 3204).

Outside Contractors & Vendors

CSUDH Chemicals

Any contractor with employees conducting work at CSUDH will be informed of the hazardous chemicals to which the contractor's employees may be exposed while performing their work. The project lead or site coordinator will describe the labeling system and also disclose how to access SDS's on campus. The contractor will take appropriate protective measures for their employees, as determined by the SDS's provided.

Contractor's Chemicals

CSUDH requires all contractors who intend to bring any hazardous chemicals to the workplace to provide an SDS for each such chemical. The contractor must explain to the project lead any precautionary measures necessary to protect CSUDH employees during normal operation conditions and potential emergencies. The contractor also will explain their company's system for labeling hazardous chemicals.

EMPLOYEE TRAINING

All new employees are provided with an overview of CSUDH's *Hazard Communication Program* during *New Employee Orientation*. Employees who use or are exposed to hazardous materials are provided with annual training. Training programs must include the following:

- **Written Hazard Communication Program**
 - Program Overview
 - Right to obtain a copy of the Hazard Communication Policy

- **Global Harmonized System**
 - Recognition of Pictograms
 - Meaning

- **Labeling Requirements for Hazardous Materials**
 - Original Containers

- Secondary Containers
- **Safety Data Sheets**
 - Purpose
 - Location
 - How to read them
 - Overview of included information
 - Hazardous materials list
- **Exposures and First Aid**
 - Physical and health risks
 - Symptoms of over-exposure
 - Emergency eye wash & first aid stations
 - Reporting an exposure
 - Reporting spills

Hazardous non-routine Tasks

Occasionally, non-routine repairs, cleaning, or other maintenance is conducted using hazardous substances that are new or infrequently used. When this occurs, managers shall provide a training refresher to inform employees of the potentially hazardous chemicals they may be exposed to and measures they can take to avoid those exposures. Specific instruction shall be provided for:

- Specific hazard(s) involved
- Review of the standard procedure (including safety measures)
- Personal protective equipment required

Introduction of New Chemicals

A safety data sheet must be submitted with or prior to receipt of the initial shipment of a new hazardous material. New hazardous materials may not be used unless a safety data sheet is uploaded into the RSS system. As new hazards are introduced, additional training will be conducted. The training shall include:

- A refresher of the *CSUDH Hazard Communication Program*
- A review for how to read an SDS
- A description of the hazards' chemical and physical properties
- A summary of the health hazards and signs or symptoms of exposure
- Proper work practices for working with a hazardous substance
- The PPE required when working with the new hazardous material
- Instructions for emergency procedures and first aid
- A demonstration of CSUDH labeling system

RECORD KEEPING

Training Records

Records for online training are maintained through CSU learn. In-person training records are maintained by EHS for three years.

Safety Data Sheets and Chemical Inventories

Safety data sheets are maintained through the Risk and Safety Solutions (RSS) website.

PROGRAM EVALUATION

The Hazardous Communication program will be reviewed annually by the EHS department. A review may also occur when:

- Unlabeled containers are reported
- An incident involving hazardous materials occurs
- Practices observed are inconsistent with this policy