



SONOMA STATE UNIVERSITY

HAZARD COMMUNICATION PROGRAM

Department of Environmental Health & Safety
September 2021 Revision 3

TABLE OF CONTENTS

1.0 INTRODUCTION AND SCOPE..... 1-1

2.0 RESPONSIBILITIES 2-1

 2.1 Department of Environmental Health and Safety 2-1

 2.2 Departments..... 2-1

 2.3 Employees 2-1

3.0 HAZARD DETERMINATION 3-1

4.0 LABELS 4-1

 4.1 Primary Containers..... 4-1

 4.2 Secondary Containers 4-2

5.0 PIPING LABELING 5-1

6.0 SAFETY DATA SHEETS (SDS) 6-1

7.0 CHEMICAL INVENTORY..... 7-1

8.0 TRAINING 8-1

 8.1 Initial Training 8-1

 8.2 On-the-Job Training 8-1

9.0 NON-ROUTINE TASKS 9-1

10.0 CONTRACTORS 10-1

11.0 PROPOSITION 65 11-1

12.0 APPLICABLE LINKS 12-1

Attachment A: Hazard Pictograms

RECORD OF REVISIONS

Revision	Date	By	Description of Revision
0	5/2016	BSI	Program written to comply with the newly implemented GHS
1	4/2019	RL	Program updated to reflect new title of EHS director and minor changes made for simplification. Overall program remains the same.
2	8/2020	CG	Content reviewed, no change. Updated document format for standardization.
3	9/2021	RL	Content updated to reflect current processes regarding responsibilities, SDS access and archiving of old departmental SDSs. Links added for access to relative programs.

Legend:

RL: Ruth LeBlanc

CG: Christy Gorman

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

1.0 INTRODUCTION AND SCOPE

Sonoma State University (SSU) is committed to providing a safe and healthful working environment for employees. SSU has developed this Hazard Communication Program to improve communication and training associated with hazardous substances. The program is designed to maintain a healthy work environment by increasing employee awareness of hazardous substances used in the workplace. These substances include, but are not limited to, chemicals, paints, inks, glues, cleaning agents, and compressed gases.

The Hazard Communication Program covers all use of hazardous materials on campus except those listed under [8 CCR 5194\(b\)\(5\)\(A-I\)](#). SSU employees covered by the Hazard Communication Program include, but are not limited to shop employees, facilities and maintenance employees, and custodial staff. Employees working in laboratories and laboratory operations are also governed by SSU's Chemical Hygiene Plan and Title 8 CCR 5191.

This document fulfills the requirements of the Hazard Communication Standard (California Code of Regulations, Title 8, Section 5194) and specifies methods used to inform employees of hazardous substances in their work environment. These methods include a written hazard communication program, labels and other forms of warning, safety data sheets, and information and training.

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

- Program Responsibilities
- Hazard Determination
- 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). No employee will be discharged or otherwise discriminated against for exercising rights afforded by this program.

A copy of this program is available on the Sonoma State University EHS Department website.

2.0 RESPONSIBILITIES

2.1 Department of Environmental Health and Safety

The Department 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 hazardous 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, including chemical labeling and storage

2.2 Departments

Departments 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
- Ensure Safety Data Sheets have been uploaded 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

2.3 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
- Adhering to precautions outlined on container labels, SOPs, and SDSs.
- 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)
- Requesting training hazardous substances with which they are unfamiliar or have concerns

3.0 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.

4.0 Labels

4.1 Primary Containers

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

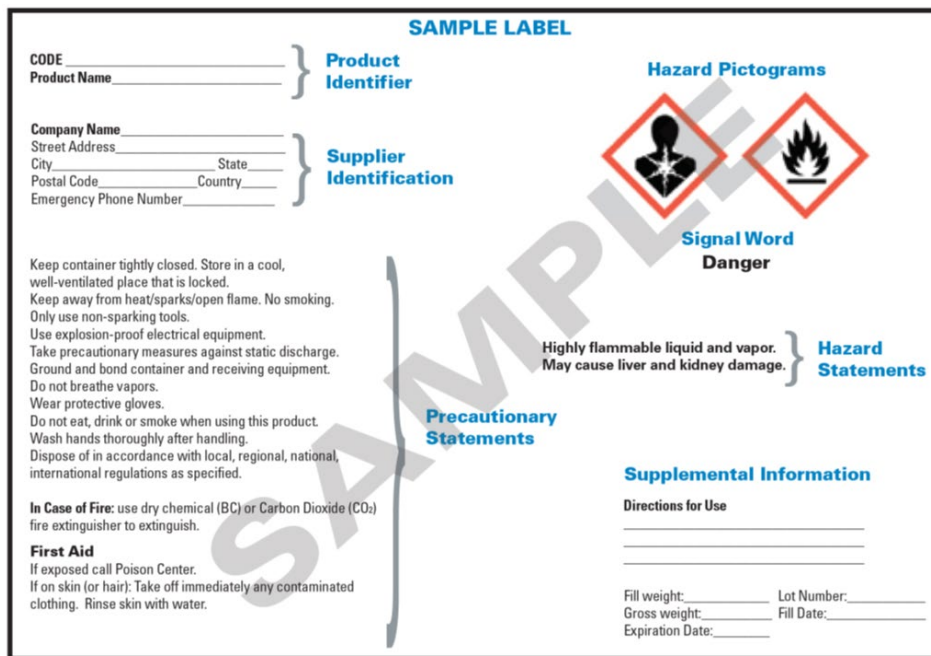
Upon arrival of chemical shipments or deliveries:

- 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 are examples of acceptable primary container labels:



4.2 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

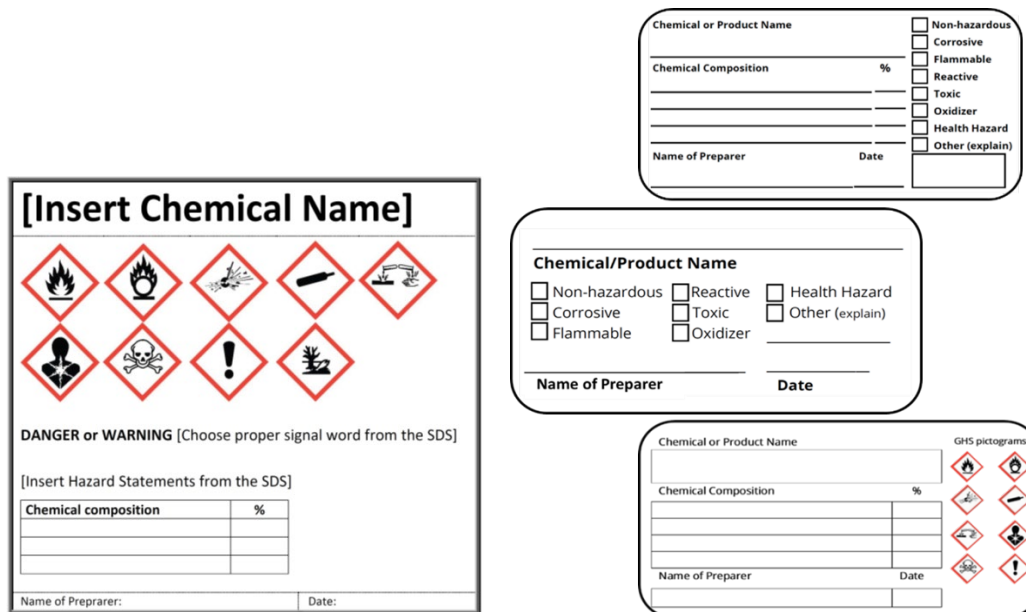
Employees with questions regarding the proper in-house label to use, should consult the EHS website for information or contact the Department of EHS prior to transferring the chemical from one container into another.

Departments 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

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.

The following are examples of acceptable secondary container labels:



Labels and GHS Templates available from Avery:
<https://www.avery.com/products/labels/usage/sign-labels>
<https://www.avery.com/srch?q=ghs%20labels>
Easy to use and create the required labels. All chemicals in a secondary container must have GHS labels.

5.0 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."

6.0 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 by the MSDSOnline™ database providing employee access to the database
- SDSs are accessible to all employees and contractors at all times throughout the day or night via MSDSOnline. .
- SDS shall also be made readily available, upon request, to the employee's designated representatives or physician, in addition to NIOSH and Cal-OSHA

Each SDS shall include the following information in the referenced order:

1. Identification
2. Hazard(s) identification
3. Composition/information on ingredients
4. First aid measures
5. Fire-fighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information, including date of preparation or last revision

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 2 business 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. If Departments do not have space for storing binders of SDS's, contact the Department of EHS for archiving old SDS.

The MSDSOnline catalog is downloaded annually. The “catalog” is available on an external memory stick in the event of an emergency and access to the internet may not be available. A memory stick will be provided to the Director of Emergency Services in the event of such an emergency.

7.0 Chemical Inventory

Updated chemical inventories are vital for confirming that SDSs are present for all chemicals in the workplace. A chemical inventory is developed, maintained and required for each shop, laboratory or area where chemicals are utilized and stored. All departments are responsible for maintaining a current inventory of all chemicals under their jurisdiction. The chemical inventory must be provided to the Dept. of EHS as part of the annual inspection protocol.

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 should include quantities that are being stored as part of normal pedagogy or practice.

8.0 Training

8.1 Initial Training

The Director of Environmental Health & Safety will ensure that training is provided to all employees that are potentially exposed to chemical hazards at Sonoma State University. Hazard Communication Training is provided via New Employee Safety Orientation and will be assigned via SSU's online Learning Management System (LMS). 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 an 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 a Sonoma State University training sign-in sheet. A copy of the sign-in sheet should be kept with the employee record (electronic or paper) and a copy sent to Human Resource's LMS administrator.

8.2 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 must review the SDS and any necessary information on the chemical by his or her supervisor in the same manner as during the initial hazard communication training.

9.0 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 presents 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.

10.0 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.

Sonoma State University's primary 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.

11.0 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.

12.0 Applicable Links

SSU's Chemical Hygiene Plan: <http://ehs.sonoma.edu/health-and-safety/chemical-hygiene>

Secondary Container Labels: <http://ehs.sonoma.edu/environmental-management/hazardous-materials-management>

Purchasing Hazardous Materials: <http://ehs.sonoma.edu/purchasing-hazardous-materials>

Attachment A: Hazard Pictograms



Health Hazard

- Carcinogen
- Mutagenicity
- Reproductive Toxicity
- Respiratory Sensitizer
- Target Organ Toxicity
- Aspiration Toxicity



Flame

- Flammables
- Pyrophorics
- Self-Heating
- Emits Flammable Gas
- Self-Reactives
- Organic Peroxides



Skull and Crossbones

- Acute Toxicity (fatal or toxic)



Exploding Bomb

- Explosives
- Self-Reactives
- Organic Peroxides



Flames Over Circle

- Oxidizers



Exclamation Mark

- Irritant (skin and eye)
- Skin Sensitizer
- Acute Toxicity
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone Layer



Corrosion

- Eye Damage
- Skin Corrosion/Burns
- Corrosive to Metals



Environment (Non-Mandatory)

- Aquatic Toxicity



Gas Cylinder

- Gasses Under Pressure