



ENVIRONMENTAL HEALTH & SAFETY

HAZARD COMMUNICATION MANUAL

REVISION DATE: DEC 2025



Cal Poly Pomona

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ACRONYMS

- 1.1 CCR California Code of Regulations
- 1.2 DOSH Division of Occupational Safety and Health
- 1.3 GHS Global Harmonized System
- 1.4 IIPP Injury Illness Prevention Program
- 1.5 NIOSH National Institute of Occupational Safety and Health
- 1.6 RCRA Research Conservation and Recovery Act
- 1.7 SDS Safety Data Sheet

REFERENCE

Labor Code Sections 6360 - 6399.9;
California Code of Regulations, Title 8, Sections 3203, 3204, 1509, 5194 and 5228.
Cal Poly Pomona [Injury Illness Prevention Program \(IIPP\)](#)

POLICY

- 2.1 It is the policy of California State Polytechnic University, Pomona, to maintain, insofar as it is reasonably within the control of the University to do so, a campus environment for students, faculty, staff and visitors that will not adversely affect their health and safety nor subject them to avoidable risks of accidental injury.
 - 2.1.1 No individual or employee shall be required to perform any task determined to be unsafe or unreasonably hazardous.
 - 2.1.2 The University shall ensure that all operational activities are carried out in compliance with existing environmental laws, rules, regulations, and campus policies in order to protect the environment.
 - 2.1.3 No person shall accept donations of hazardous materials without written authorization from EH&S corresponding to an itemized inventory of materials and Safety Data Sheets (SDS).
- 2.2 The University shall make available to appropriate employees, information it has about any substance listed in the National Institute of Occupational Safety & Health (NIOSH) Registry of Toxic Effects of Chemical Substances which employees may use or to which they may be or have been exposed.

PURPOSE

- 5.1 The purpose of this program is to improve the detection, treatment, and prevention of occupational injuries, illness and disease. To support worker's right to know, it is further intended to ensure that departments and workers have the information necessary for them to know when they are working with or may be exposed to hazardous substances.
- 5.1 It is necessary to ensure that departments provide their employees with training to avoid exposure to

hazardous substances and what to do if they are accidentally exposed to such substances.

SCOPE

4.1 This program shall apply to:

- a. All campus departments that use, handle, or store hazardous substances (see Appendix A, Title 8 CCR 5194). Disposal activities involving hazardous materials are covered in the Hazardous Waste Policy and Procedure Manual, available from the Environmental Health & Safety Department.
- b. Any hazardous substance that is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

4.2 This program shall not apply to:

- a. Any hazardous waste regulated by the Solid Waste Disposal Act, amended by the Resource Conservation and Recovery Act of 1976
- b. Tobacco or tobacco products
- c. Wood or wood products
- d. Article
- e. Food, drugs, or cosmetics intended for personal consumption by employees while in the workplace.

ROLES & RESPONSIBILITIES

Environmental Health & Safety

- a. Develop, implement and monitor the Hazard Communication program
- b. EH&S will provide general Hazard Communication Training to University employees
- c. Assist departments in complying with the following program requirements
 - i. Material Labeling
 - ii. Safety Data Sheets (SDS)
 - iii. Training
 - iv. Recordkeeping
- d. Conduct periodic inspection to document program compliance
- e. Maintain records pertaining to environmental monitoring, employee exposure and employee medical records
- f. Provide access to records in accordance with Article 10 of this manual.
- g. All hazardous material donations accepted by the University will be reviewed and approved by EH&S prior to receipt to ensure that the corresponding SDS records are provided and the material does not present a risk to health and safety.

Department Managers/Supervisors

- a. Develop local procedures to ensure effective compliance with the following:
 - i. Hazard Communication requirements as outlined in 8 CCR Section 5194; (ref. Appendix A)
 - ii. Sections 1509 (Construction Safety Orders)
 - iii. Sections 3204 (General Industry Safety Orders)
 - iv. Injury Illness Prevention Program (IIPP)
- b. Ensure that all requirements of the Hazard Communication Program have been met before

employees are exposed to hazardous substances under normal conditions of use or in a foreseeable emergency.

- c. Request a copy of the SDS from the material manufacturer if one is not already available.
- d. Develop and maintain an inventory of hazardous substances present in all work areas within the department and maintain a current file of SDSs for each hazardous substance. Departments will certify that they have conducted an annual hazardous substance inventory review with the requirement that they conduct SDS reconciliation. The department will then be required to provide requests to EH&S for any SDS that they do not have on file. Office of Environmental Health and Safety (EH&S) x4697 6
- e. Ensure the Hazard Communication Notice is posted in a prominent location for department employees to review; Develop methods to inform employees of the hazards of non-routine tasks and the hazards associated with unlabeled pipes in their work areas.
- f. Develop methods as appropriate, to inform outside contractor's employees who work in areas under department jurisdiction of the hazardous substances to which those employees may be exposed. Departments must ensure outside employers working in the same area are informed of hazardous chemicals present, provided access to SDS, and advised on labeling systems and precautionary measures.
- g. Ensure and maintain compliant labels on all chemicals under the department's that meet a labeling requirement identified in Section 6. Labels must be compliant with the GHS standard as identified in this program.

Employees

- a. Because of the number of potential hazards that may exist or be created in the work environment, employees must use good judgement and common sense and at all times.
- b. Each employee assigned to work with a hazardous substance shall read and comply with all hazard communication procedures, whether written or oral, while performing assigned duties.
- c. Although no single set of safety procedures can guarantee accident-free employment or place of employment, the most common minimum safety standards are listed in this program.
- d. Employees must comply with the safe work practices document published by EH&S and provided via the Injury Illness Prevention Program (IIPP).
- e. Review and understand the contents of the SDS prior to working with a material.
- f. Ensure all chemicals within an employee's control are maintained on a chemical inventory.
- g. Ensure that all items included on the inventory have a current SDS available.

Principal Investigator (PI)

- a. Ensure all materials and/or covered equipment are procured in alignment with the [EH&S Ordering and Pre-Approval procedures](#)
- b. Ensure all ordered materials are added and maintained on a chemical inventory.
- c. Ensure all chemicals are:
 - i. Adequately labeled
 - ii. Stored in alignment with EH&S procedures.
 - iii. Accompanied by a current SDS which must be accessible upon request and
- d. Properly accumulated as a waste product. d. Complete training requirements identified in Article IX
- e. Ensure all students have completed training requirements identified in Article IX Section 9.5.

LABELING

- 5.1 Each department shall ensure that all containers of hazardous substances in the workplace are labeled with the following information
- a. Identify the hazardous substance(s) contained therein
 - b. Appropriate hazard warnings, statements and symbols (pictograms)
 - c. Name of manufacturer, address and phone number.
- 5.2 All secondary containers shall be labeled.
- 5.3 Employees shall not remove or deface existing labels on material containers. Damaged labels should be replaced with a comparable label as soon as possible.
- a. Labels can be requested from EH&S. Labels can also be generated using the Avery GHS Wizard which is accessible using the following link which provides all GHS pictograms and HazCom identifiers.
- <https://www.avery.com/industrial/ultraduty-ghs-chemical-labels/>
- 5.4 Labeling requirements of this program do not apply to the following substances:
- a. Any pesticide regulated by the Federal Insecticide, Fungicide, and Rodenticide Act.
 - b. Any food, food additive, color additive, drug, or cosmetic regulated by the Federal Food, Drug and Cosmetic Act.
 - c. Any distilled spirits, wine, or malt beverage intended for non-industrial use or regulated by the Federal Alcohol Administration Act; and d. Any consumer product or hazardous substance regulated by the Consumer Product Safety Act.
- 5.5 All pipes transporting hazardous materials above ground shall be labeled. Employees shall not work on any unlabeled pipe(s) until the contents have been identified and appropriate precautions have been implemented.

SAFETY DATA SHEET (SDS)

- 7.1 All chemicals shall have a current [SDS accessible](#) in the lab which adheres to the GHS template. All SDS must comply with the 16-section GHS format per Appendix D of §5194.
- 6.2 SDS records shall match the chemical inventory for each facility or lab.
- 6.3 Missing records can be accessed through the material manufacturer or on the EH&S website SDS application [Risk and Safety Solutions \(RSS\) SDS](#).
- 6.4 SDS records must be readily accessible to employees and students. While EH&S recommends maintaining physical SDS records in a dedicated binder, records may also be maintained electronically through the campus [RSS SDS](#) application or other approved electronic systems, provided they can be produced immediately upon request. Regardless of the storage method, Office of Environmental Health and Safety (EH&S) x4697 8 SDS records must be reviewed regularly to ensure they are current and accurately reflect the chemical inventory. An SDS Access poster with access instructions shall be posted in areas where hazardous materials are stored or used to ensure employees and students know how to obtain this information. See Appendix A: Safety Data Sheet (SDS) Electronic Access for detailed access instructions.

TRAINING

- 7.1 The employer shall provide employees with information and training on hazardous substances in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area.
- 7.2 It shall be the responsibility of the HEERA Manager to determine when a new hazard has been introduced into the work area.
- 7.3 Employees shall be trained on the contents of an SDS.
- 7.4 Employees will be informed of their rights under the Hazard Communication Standard, including the right to access chemical hazard information, to designate a representative or physician to obtain information, and to be protected from retaliation when exercising these rights.
- 7.5 Employee Training Employees, including Faculty, Staff and Student Assistants, shall complete the following web-based safety training modules through the SumTotal training portal.
 - Step 1: [Employee Training Dashboard](#)
 - Step 2: Once logged in, employees can access safety training by searching the course library or using the following course links.
 - [Hazard Communication](#)
- 7.6 Student Training Students, graduate students, and interns must complete online safety training through the dedicated student training portal.
 - Step 1: [Student Training Dashboard](#)
 - Step 2: Once logged in, students can access safety training by searching the course library or using the following course links.
 - [Hazard Communication](#)

RECORDKEEPING

- 7.1 All records relating to employee exposure and environmental monitoring shall be maintained for 30 years post-employment and in alignment with [8 CCR §3204](#).
- 7.2 All records shall be made available upon request to the employee or a representative of the Division of Occupational Safety and Health (DOSH).
- 7.3 An employee may designate a representative to access their confidential records on their behalf by submitting an authorization to release medical records.
- 7.4 Medical information that may be pertinent to a physician, nurse or other health care professional and may be included in an employee's medical record includes but may not be limited to the following:
 - a. Health History Questionnaire.
 - b. Results of medical examinations, lab work and other diagnostic tests.
 - c. Medical opinions, diagnoses, progress notes and recommendations.
 - d. Treatment notes and prescriptions
 - e. Employee medical complaints
- 7.5 The Hazard Communication Program shall be made accessible to employees, students and regulatory officials, upon request.

DOCUMENT REVISION HISTORY

Revision Date	Summary of Changes	Updated By
June 18, 2018	New plan template, program updates and procedure changes.	M. DeSalvio
March 5, 2019	Implemented changes to SDS Procedures	M. DeSalvio
August 14, 2019	Updated training links	M. DeSalvio
October 1, 2019	Updated formatting, training requirements and aligned with revised procedures.	M. DeSalvio
September 19, 2025	Departments Responsibilities- multiemployer worksite, Safety Data SheetsRSS SDS accessibility and Appendix A, Training- employees' rights, updated Hyperlinks	Benjamin Lucas
December 12, 2025	Updates Manual Template	Lori Inarda

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APPENDICES

Appendix A— SAFETY DATA SHEET (SDS) ELECTRONIC ACCESS POSTER

Environmental Health & Safety
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Safety Data Sheet (SDS): Electronic Access

Overview: Safety Data Sheets (SDS), formally known as Material Safety Data Sheets (MSDS), are provided by manufacturers of various chemical materials, and are now made in a standard format that is uniformly reported regardless of a material's origin or manufacturer. A SDS consists of 16 different standardized sections which describe the material in sufficient detail to protect against material exposure and provide guidance for emergency response situations.

Hazardous materials are used in a variety of different operations involving laboratories, shops, maintenance areas, storage areas and even offices. Since hazardous materials are used in many daily activities, including consumer-based products, manufacturers are required to provide a Safety Data Sheet (SDS) with any material they ship that identifies the hazards of that material and important considerations if spilled. SDS's are required to be maintained in each location where hazardous materials are present to allow employees the opportunity to reference that information before being exposed to that material. SDS's have also proven to be a valuable resource in the event of an emergency.

Cal OSHA- [Title 8, CCR, §5194. Hazard Communication](#), requires the campus to maintain copies of safety data sheets for each hazardous chemical in the workplace and shall ensure that they are readily accessible to employees either through electronic access or other alternatives. Safety data sheets shall also be made readily available, upon request, to designated representatives. This requirement can be met by maintaining paper copies of SDS's in workspaces or through electronic access.

Steps for electronic SDS access for Employees and Students:

1. Log in to your workplace computer with your [Bronco ID](#) and [Password](#).
2. Log in to [Risk and Safety Solutions SDS](#) application. Use your [Bronco Email](#) and [Password](#).
3. Search for chemicals by name, CAS number, product number, or vendor:



[RSS SDS App](#)

Search SDS			
Search by Name, Product Number and Vendor			
Product Name ↑	Vendor	Version Date	Product Numbers
1,2,7,8-Diepoxyoctane_Sigma_SDS	SIGMA	N/A	12281-BULK, 12281 BULK

4. Alternatively, SDSs may be available through common internet search engines (e.g., Google, Bing, Yahoo) by entering the manufacturer, product name, product number, and CAS number.
5. Review, save, and print SDSs as required by [Title 8, CCR, §5194](#) and the campus's [Chemical Hygiene Plan](#).
6. If you need further assistance managing chemical safety data sheets in your workplace, please contact EH&S at 909-869-4697 or the Chemical Hygiene Officer- Benjamin Lucas, 909-869-3488, bjlucas@cpp.edu.

Please post and maintain this SDS electronic access guidance by your workplace computer or hazardous material storage/use location.



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