

The Hazard Communication Manual focuses on providing employees with the fundamentals of recognizing chemical hazards in the workplace and emphasizes an employee's right to know what chemical hazards they may be exposed to while performing their assigned duties. The Global Harmonized System (GHS) enhances this program to clarify hazard identification by focusing on an employee's right to understand.

Hazard Communication Manual

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Approval

Signature:



Date: 10/04/2019

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Annual Plan Review

Revision Date	Reviewer	Summary of Changes (if applicable)	Approved By:
June 18, 2018	M. DeSalvio	New plan template, program updates and procedure changes.	
March 5, 2019	M. DeSalvio	Implemented changes to SDS Procedures	
August 14, 2019	M. DeSalvio	Updated training links	
October 1, 2019	M. DeSalvio	Updated formatting, training requirements and aligned with revised procedures.	

Article I. 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

Article II. 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 \(IIPP\)](#)

Article III. Policy

- 3.1. 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.
 - 3.1.1 No individual or employee shall be required to perform any task determined to be unsafe or unreasonably hazardous.
 - 3.1.2 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.
 - 3.1.3 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).
- 3.2 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.

Article IV. Purpose

- 4.1 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.

- 4.2 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.

Article V. Scope

- 5.1 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.

- 5.2 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. Articles; and
- e. Food, drugs, or cosmetics intended for personal consumption by employees while in the workplace.

Article VI. Responsibilities

6.1 Environmental Health and Safety (EH&S)

- 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.

6.2 Departments

- 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); and*
 - 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.

- e. Ensure the Hazard Communication Notice is posted in a prominent location for department employees to review;
- f. Develop methods to inform employees of the hazards of non-routine tasks and the hazards associated with unlabeled pipes in their work areas.
- g. 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.
- h. 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.

6.3 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.

6.4 Principal Investigator (PI)

- a. Ensure all materials and/or covered equipment are procured in alignment with the EH&S Ordering and Pre-Approval procedures.
<https://www.cpp.edu/~ehs/procurement.shtml>

- 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*
 - iv. *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.

Article VII. Labeling

- 7.1 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); and
 - c. Name of manufacturer, address and phone number
- 7.2 All secondary containers shall be labeled
- 7.3 Employees shall not remove or deface existing labels on material containers. Damaged labels should be replaced with a comparable label as soon as possible.
 - 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/>
- 7.4 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.
- 7.5 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.

Article VIII. Safety Data Sheets (SDS)

- 8.1 All chemicals shall have a current SDS accessible in the lab which adheres to the GHS template.
- 8.2 SDS records shall match the chemical inventory for each facility or lab.
- 8.3 Missing records can be accessed through the material manufacturer or on the EH&S website using the [SDS online database](#).
- 8.4 SDS records must be accessible. While EH&S recommends maintaining SDS records in a dedicated binder, these records can be maintained electronically provided the records can be produced upon request. Regardless of the storage method, SDS records should be reviewed on a regular basis to ensure they are current and best reflect the current chemical inventory.

Article IX. Training

- 9.1 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.
- 9.2 It shall be the responsibility of the HEERA Manager to determine when a new hazard has been introduced into the work area.
- 9.3 Employees shall be trained on the contents of an SDS.
- 9.4 Employee Training
Employees, including Faculty, Staff and Student Assistants shall complete the following web-based safety training modules through the SumTotal training portal.
 - [Hazard Communication](#)
 - [Safety Data Sheets](#)
- 9.5 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 laser safety training by searching the course library or using the following course links
 - [Hazard Communication](#)
 - [Safety Data Sheets](#)

Article X. Recordkeeping

- 10.1 All records relating to employee exposure and environmental monitoring shall be maintained for 30 years post-employment and in alignment with [8 CCR §3204](#)
- 10.2 All records shall be made available upon request to the employee or a representative of the Division of Occupational Safety and Health (DOSH).
- 10.3 An employee may designate a representative to access their confidential records on their behalf by submitting an authorization to release medical records.
- 10.4 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; and
 - e. Employee medical complaints
- 10.5 The Hazard Communication Program shall be made accessible to employees, students and regulatory officials, upon request.