



**Santa Clara  
University**

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# Hazard Communication Program

**Santa Clara University (SCU)  
500 El Camino Real  
Santa Clara, CA 95053**

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## Program Review Record

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Updates to program made December 2015		
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Sean Collins	EHS Director	EHS
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## Program Approval

<i>Signature on file in the EHS Office</i>	<i>1/31/11</i>
<b>Signature</b>	<b>Date</b>
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# Hazard Communication Program

## 1. Purpose

This program is designed to promote a safe and healthy workplace by complying with the Cal/OSHA Hazard Communication Standard (California Code of Regulations, Title 8, Section 5194). This Hazard Communication Program has been developed to communicate information about hazards of substances employees use or come into contact with as part of their work. Components of the program include adequate labeling of hazardous substances in the workplace, providing information such as Safety Data Sheets (SDSs) for hazardous substances, and training employees on chemical hazards in the workplace.

## 2. Applicability

**Employees.** The Hazard Communication Program described in this document is applicable to all Santa Clara University employees (staff, faculty and student employees), except employees working in laboratories, which are covered by the SCU Chemical Hygiene Program.

**Non-Santa Clara University Employees (including contractors).** The SCU Office of Risk Management has policies concerning non-Santa Clara University employees working at the University. Before persons from other universities, outreach programs, or similar operations are permitted to work at Santa Clara, Risk Management must be contacted to determine under what conditions such work is to be allowed. Any non-SCU employees should be informed any hazardous substance that they are likely to encounter on campus.

All non-SCU employees including Contractors that intend to bring non-consumer chemicals onto the SCU site must notify the EHS Director at least one week in advance of bringing those chemicals onto the site (Contractors must also comply with other requirements contained in the SCU's Contractor Safety Program).

## 3. Definitions

NOTE: The most pertinent definitions for all users are contained in [Attachment 1](#). Review and use as necessary.

## 4. Program Roles and Responsibilities

The following are the SCU Roles and Responsibilities in regards to Hazard Communications:

Group	Responsibilities
Faculty, Staff, Student Employees	<ul style="list-style-type: none"> <li>▪ Notify EHS Dept. when SDSs are missing or incomplete.</li> <li>▪ Abide by SDS warnings, precautions, and personal protective equipment requirements.</li> <li>▪ Properly label transfer containers.</li> <li>▪ Properly store/use all hazardous substance and waste containers.</li> </ul>
Supervisors	<ul style="list-style-type: none"> <li>▪ Identify hazardous substances present in the work area.</li> <li>▪ Maintain an inventory list of hazardous substances present in the work areas.</li> <li>▪ Ensure hazardous substances are appropriately labeled or posted.</li> <li>▪ Obtain SDSs for hazardous substances used in the work area</li> <li>▪ Ensure SDSs are available to employees.</li> <li>▪ Ensure employees are trained on physical hazards, health hazards, emergency procedures, and safe handling procedures for hazardous substances used and waste generated in the work area. Ensuring that employees follow established safety procedures.</li> <li>▪ Adequately inform any non-University personnel sharing the same work area of the hazardous substances to which their employees may be exposed while performing their work.</li> </ul>
Contractors and Non-SCU employees	<ul style="list-style-type: none"> <li>▪ Notify the EHS Director at least one week prior to bringing chemicals for use/store for projects on to the SCU campus.</li> </ul>
EHS Director	<ul style="list-style-type: none"> <li>▪ Maintain a current inventory of hazardous materials and safety data sheets.</li> <li>▪ Ensure access to SDSs through the EHS website or by paper copy if requested by employees.</li> <li>▪ EHS Director arranges to have Prop 65 signs posted and provides Prop 65 training to employees as needed. (If applicable, the EHS Director will arrange for labels, signs, and other warnings to be printed in other languages.)</li> <li>▪ Provide training materials and support supervisor's job-specific instructions to employees as needed.</li> <li>▪ Conduct periodic verification of the Hazard Communication Program.</li> </ul>
Utility Director	<ul style="list-style-type: none"> <li>▪ Provide information to employees who need to work in areas where there are unmarked pipes.</li> </ul>
	<ul style="list-style-type: none"> <li>▪</li> </ul>
	<ul style="list-style-type: none"> <li>▪</li> </ul>

## 5. Requirements

### Chemical Purchase Requests

All chemicals shall be purchased by the University and employees are forbidden from bringing in chemicals for use. All chemical purchases require the employee or the supervisor to submit a "Request for Chemical Purchase" through the Environment, Health, and Safety Department for review. Part of the review process includes, but not limited to:

1. Reviewing the safety data sheet (SDS) from the manufacturer
2. Reviewing any potential health and environmental concerns
3. Reviewing all PPE requirements to ensure our current PPE can be used or if an additional type of PPE needs to be purchased
4. Reviewing chemical storage requirements (incompatibilities) for our Stockroom

If a material is approved for purchase we will let the requester and the Stockroom know of the approval along with update our chemical inventory system. However, if a material is not approved for purchase we will work with the requester regarding the areas of concerns to see if the manufacturer will have an alternative available.

### Maintain List of Hazardous Substances

SCU utilizes the Chimera chemical management system to maintain its hazardous material inventory. Chimera is accessed from the SCU EHS website. SDS for all chemicals in our inventory are also accessed via Chimera. The EHS director will provide printed copies of the inventory for employees at any time upon request. Information about SDS and manufacturer container labels is found on the EHS website.

### Provide Proposition 65 Information

The EHS Director is responsible for obtaining updates of Proposition 65 listed chemicals and providing new information to affected employees. Prop 65 chemicals are a list of chemicals known to the state to cause cancer or reproductive toxicity determined by the Office of Environmental Health and Hazard Assessment (OEHHA). The EHS Director will arrange with Facilities to post signs where appropriate.

### Access to Material Safety Data Sheets (SDSs)

When an employee reviews a Material Safety Data Sheet for a new chemical and sees that there is significant health and safety implications, then the employee should contact the EHS Director **immediately** to ensure proper safeguards are in place before purchasing or using the chemical.

Legible SDS copies for all hazardous substances to which employees may be exposed are readily available for review to all employees in their work area at anytime on the SCU EHS website from the Chimera system. The EHS Director will provide paper copies whenever requested.

If a SDS is missing, new hazardous substance(s) in use do not have SDSs, or if an SDS is obviously incomplete, employees are urged to contact the EHS Director and a new SDS will be requested from the manufacturer.

SCU's backup system in the event of failure of the primary SDS retrieval system (SCU EHS website) is for employees to request paper SDSs by telephone (408-554-5078). An SDS hard copy will be provided to the requester as soon as possible after the telephone request is made.

## **Labels and Other Forms of Warning**

On primary containers, it is essential to ensure that manufacturer labels are preserved and not defaced or damaged as the labels contain the required chemical information and hazards. Information about how to read primary container hazardous material labels is found on the EHS website. SCU requires users of hazardous materials in secondary containers to be fully labeled using the SCU hazardous material label template which is found on the EHS website. This applies to any container of a hazardous material that is not in the original manufacturer's container.

## **Hazardous Substance Storage Requirements**

Primary and transfer containers must be closed, capped or otherwise covered (sealed) when not being used. All flammable substances, not in immediate use, are to be kept in a flammable liquid storage cabinet when not being used or when the use of the chemical is complete.

## **Labeled/Unlabeled Pipes**

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".

For other above-ground, unlabeled pipes that do not contain hazardous substances but may have associated hazards if disturbed or cut (e.g., steam lines, oxygen lines), the Utility Director will inform employees before they enter the area and initiate work of the following:

- the location of the pipe or piping system or other known safety hazard,
- the substance in the pipe,
- potential hazards, and
- safety precautions.

## **Non-SCU Employees including Informing Contractors**

All non-SCU employees that intend to bring non-consumer chemicals onto the SCU site must notify the EHS Director at least one week in advance of bringing those chemicals onto the site so that any SCU-notification or regulatory issues may be identified. Contractors comply with this requirement through the SCU Contractor Safety Program.

To ensure that outside contractors work safely on the SCU campus and to protect our employees from chemicals used by outside contractors, SCU's Contractor Safety Program requires contractors to provide a list of materials and chemicals to be used and stored on campus and to provide manufacture's SDSs of products including information on hazardous substances, Proposition 65 chemicals, environmental impact, etc.

Contractors may be asked to provide information regarding precautions and protective measures that employees may take to minimize the possibility of exposure. SCU will



provide contractors with information on our labeling system and access to the online SDSs.

## **6. Reporting**

The EHS Director will conduct periodic reviews and updates of the written Hazard Communication program, the hazardous substance inventory, SDSs and Prop 65 inventory to assure compliance and effectiveness of the program.

## **7. Training and Awareness**

Training of employees shall include the following:

- Employees shall be informed of any operations in their work area where hazardous substances are present.
- Employees shall be informed of the location and availability of the written hazard communication program, including the list(s) of hazardous substances and material safety data sheets required by this section.
- Employees shall be trained in the methods and observations that may be used to detect the presence or release of a hazardous substance in the work area (such as monitoring conducted by SCU, continuous monitoring devices, visual appearance or odor of hazardous substances when being released, etc.).
- Employees shall be trained in the physical and health hazards of the substances in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures SCU has implemented to protect employees from exposure to hazardous substances, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- Employees shall be trained in the details of the hazard communication program developed by SCU, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

Employees shall be informed of the right:

1. To personally receive information regarding hazardous substances to which they may be exposed, according to the provisions of this section;
2. For their physician or collective bargaining agent to receive information regarding hazardous substances to which the employee may be exposed according to provisions of this section;
3. Against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the California Hazardous Substances Information and Training Act.

Employees will receive training by EHS and their supervisor as part of new employee orientation and additional training when a new hazard is introduced into the workplace.

## Hazardous non-routine tasks

Periodically, SCU employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees will be given information by their supervisor or Principle Investigator on hazards associated with an activity. This information will cover:

- Specific hazards associated with the project.
- Measures SCU can take to reduce risk by controlling hazards such as providing exhaust ventilation systems, ensuring the presence of another employee, respiratory protection program, emergency procedures, etc.
- Required proper personnel protective equipment and safety procedures.

Examples of non-routine tasks performed by SCU employees:

- Seasonal landscape pesticide or fertilizer application.
- Hazardous substance exposure during remodeling and demolition.
- New, short-term research projects.

## 8. Record Retention

Completed records will be maintained as follows:

<b>Record</b>	<b>Location</b>	<b>Duration</b>	<b>Responsible Party</b>
SDSs	Chimera	When superseded by new SDSs	EHS Director
Hazardous Substance Inventory	Chimera	1 year	EHS Director
Archived Hazardous Substance Inventory (PDF)	Chimera	30 years	EHS Director
Prop 65 Inventory	Chimera	1 year	EHS Director
Hazard Communication Training Records	EHS files	3 years	EHS Director

## 10. Key References and Resources

The document(s) listed below may be obtained from the EHS Office either in paper form or on the EHS Website.

8 CCR 5194; 5194.1

SCU Contractor Safety Program

SCU Injury and Illness Prevention Program

SCU Chemical Hygiene Plan

SCU Chemical Safety Information



## **ATTACHMENT 1 - DEFINITIONS**

**Hazardous Chemical** – are listed in:

*Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, a hazard not otherwise classified, or is included in the List of Hazardous Substances prepared by the Director pursuant to Labor Code section 6382.*

**Primary Container** - the container in which the product is received from the manufacturer or distributor.

**Transfer Container** - a container different from the primary (original manufacturer) container in which the product is stored or dispensed for use (i.e., vial, small bottle, squeeze bottle).