



**Santa Clara
University**

Hazard Communication Program

**Santa Clara University (SCU)
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Program Review Record

Revision 1 - January 2011		
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Program Approval

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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 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"> ▪ Notify EHS Director when SDSs are missing or incomplete. ▪ Abide by SDS warnings, precautions, and personal protective equipment requirements. ▪ Properly label transfer containers. ▪ Properly store/use all hazardous substance and waste containers.
Supervisors	<ul style="list-style-type: none"> ▪ Identify hazardous substances present in the work area. ▪ Maintain an inventory list of hazardous substances present in the work areas. ▪ Ensure hazardous substances are appropriately labeled or posted. ▪ Obtain SDSs for hazardous substances used in the work area ▪ Ensure SDSs are available to employees. ▪ 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. ▪ 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.
Contractors and Non-SCU employees	<ul style="list-style-type: none"> ▪ Notify the EHS Director at least one week prior to bringing chemicals for use/store for projects on to the SCU campus.
EHS Director	<ul style="list-style-type: none"> ▪ Maintain a current inventory of Hazardous Substances, SDSs and Prop 65 Materials available via EHS website for SCU community to reference. ▪ Archive the Hazardous Substance Inventory annually. ▪ Ensure access to SDSs through the EHS website or by paper copy if requested by employees. ▪ 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.) ▪ Provide training materials and support supervisor's job-specific instructions to employees as needed. ▪ Conduct periodic verification of the Hazard Communication Program.
Utility Director	<ul style="list-style-type: none"> ▪ Provide information to employees who need to work in areas where there are unmarked pipes.

5. Requirements

Maintain List of Hazardous Substances

SCU maintains an inventory list of all known hazardous substances using an online system called CIS Chemical Inventory System® (CISPro). Specific information on each

noted hazardous substance can be obtained by reviewing the SDSs also available on the CISPro system through the SCU EHS website (<http://www.scu.edu/operations/ehs/>). Through the CISPro system, SCU maintains a list of chemicals, their locations and SDSs which satisfies the employee exposure requirements in Title 8 CCR 3204. The EHS director will provide printed copies of the inventory for employees at any time upon request. Attachment 2 contains information regarding how to understand and interpret SDSs.

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 (http://www.oehha.ca.gov/prop65/prop65_list/files/P65single082515.pdf) 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. In the Chemistry and Biology departments, the Laboratory Managers/Technicians should contact the EHS Director for if any new and significant health and safety information noted for a requested 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. 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

Before hazardous substance containers are released to the work area, the SCU employee purchasing the hazardous substance will verify that the primary containers are labeled as follows and SCU employees utilizing transfer containers will ensure that they are labeled as follows:

Label Information	Primary Container	Transfer Container
Identity of the hazardous substances	X	X
Applicable hazard warnings	X	X
Name/address of manufacturer	X	

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.

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.

The Assistant Vice President for University Operations, along with the Safety Committee, will review the annual verification of Hazardous Communication Program and ensure that any compliance issues identified are resolved.

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:

- o Specific hazards associated with the project.
- o 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.
- o Required proper personnel protective equipment and safety procedures.

Examples of non-routine tasks performed by SCU employees:

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

8. Record Retention

Completed records will be maintained as follows:

Record	Location	Duration	Responsible Party
SDSs	CISPro System	When superseded by new SDSs	EHS Director
Hazardous Substance Inventory	CISPro System	1 year	EHS Director
Archived Hazardous Substance Inventory (PDF)	EHS Data Files	30 years	EHS Director
Prop 65 Inventory	CISPro System	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

http://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf

SCU Contractor Safety Program

SCU Injury and Illness Prevention Program

SCU Chemical Hygiene Plan

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).

ATTACHMENT 2 - Guide to Understanding SDSs

The Safety Data Sheet, SDS, must include, at a minimum, the information in the described sections below. Although the style and layout may vary by manufacturer or distributor, every section must be complete, even if the item is not applicable (indicated by N/A). There should be no blank spaces. Note that some information, such as the chemical family, may be included, but is not required.

The SDS is prepared by the manufacturer or importer of the product. Some data sheets contain excellent information, some are adequate, and many are poor. Other sources of data on toxic and health effects can be consulted for more complete information. You may contact the manufacturer or EHS Department if additional information or clarification is needed.

Section 1: Identification of the substance or mixture and of the supplier

- GHS product identifier
- Other means of identification
- Recommended use of the chemical and restrictions on use
- Supplier's details (including name, address, phone number, etc.) Emergency phone number

Section 2: Hazards identification

- GHS classification of the substance/mixture and any national or regional information.
- GHS label elements, including precautionary statements (Hazard symbols may be provided as a graphical reproduction of the symbols in black and white or the name of the symbol, e.g., flame, skull and crossbones.)
- Other hazards which do not result in classification (e.g., dust explosion hazard) or are not covered by the GHS.

Section 3: Composition/information on ingredients

Substance

- Chemical identity
- Common name, synonyms, etc.
- CAS number, EC number, etc.
- Impurities and stabilizing additives which are themselves classified and which contribute to the classification of the substance.

Mixture

- The chemical identity and concentration or concentration ranges of all ingredients which are hazardous within the meaning of the GHS and are present above their cutoff levels.

Section 4: First aid measures

- Description of necessary measures, subdivided according to the different routes of exposure, i.e., inhalation, skin and eye contact, and ingestion

- Most important symptoms/effects, acute and delayed
- Indication of immediate medical attention and special treatment needed, if necessary

Section 5: Firefighting measures

- Suitable (and unsuitable) extinguishing media
- Specific hazards arising from the chemical (e.g., nature of any hazardous combustion products)
- Special protective equipment and precautions for firefighters

Section 6: Accidental release measures

- Personal precautions, protective equipment and emergency procedures
- Environmental precaution
- Methods and materials for containment and clean-up

Section 7: Handling and storage

- Precautions for safe handling
- Conditions for safe storage, including any incompatibilities

Section 8: Exposure controls/personal protection

- Control parameters, e.g., occupational exposure limit values or biological limit values
- Appropriate engineering controls
- Individual protection measures, such as personal protective equipment

Section 9: Physical and chemical properties

- Appearance (physical state, color, etc.)
- Odor
- Odor threshold
- pH
- Melting point/freezing point
- Initial boiling point and boiling range
- Flash point
- Evaporation rate
- Flammability (solid, gas)
- Upper/lower flammability or explosive limits
- Vapor pressure
- Vapor density
- Relative density
- Solubility(ies)
- Partition coefficient: n-octanol/water
- Autoignition temperature
- Decomposition temperature

Section 10: Stability and reactivity

- Chemical stability
- Possibility of hazardous reactions
- Conditions to avoid (e.g., static discharge, shock or vibration)
- Incompatible materials
- Hazardous decomposition products

Section 11: Toxicological information

Concise but complete and comprehensible description of the various toxicological (health) effects and the available data used to identify those effects, including:

- Information on the likely routes of exposure (inhalation, ingestion, skin and eye contact)
- Symptoms related to the physical, chemical and toxicological characteristics
- Acute and chronic effects from short- and long-term exposure
- Numerical measures of toxicity (such as acute toxicity estimates)

Section 12: Ecological information

- Ecotoxicity (aquatic and terrestrial, where available)
- Persistence and degradability
- Bioaccumulative potential
- Mobility in soil.
- Other adverse effects

Section 13: Disposal considerations

Description of waste residues and information on their safe handling and methods of disposal, including the disposal of any contaminated packaging.

Section 14: Transport information

- UN Number
- UN Proper shipping name
- Transport Hazard class(es)
- Packing group, if applicable
- Marine pollutant (Yes/No)

Special precautions which a user needs to be aware of or needs to comply with in connection with transport or conveyance either within or outside their premises.

Section 15: Regulatory information

Safety, health and environmental regulations specific for the product in question.

Section 16: Other information including information on preparation and revision of the SDS.