



Hazard Communication Program

Updated June 2022

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Appendix A Safe Work Practices Template

List of Acronyms and Abbreviations

ACGIH	American Conference of Governmental Industrial Hygienists
Cal/OSHA	California Occupational Safety and Health Administration
CCR	Code of California Regulations
CFR	Code of Federal Regulations
GHS	Globally Harmonized System
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
TLV	Threshold Limit Value

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1. Introduction

This document establishes the El Camino College's written hazard communication program. It is the policy of the district to ensure that employees know the properties and potential hazards of the materials which they use or to which they are exposed and are trained in the precautions to take in order to prevent exposure. This program is intended to address compliance with the Cal/OSHA Hazard Communication Regulation (California Code of Regulations, Title 8, Section 5194- 8CCR§5194). A link to the regulation is provided: <https://www.dir.ca.gov/title8/5194.html>

The Hazard Communication regulation requires employers to provide information to their employees about the hazardous substances to which they may be exposed to via a hazard communication program, labels/other forms of warning, safety data sheets (SDSs), information, and regular training. Distributors are also required to transmit the required information to employers. A copy of El Camino College's written Hazard Communication Program is available to all employees online through the campus website <https://www.elcamino.edu> and through the Office of Workplace Safety and Risk Management.

This written hazard communication program begins by describing which work operations are covered and how the program is implemented. This is followed by a discussion of the roles and responsibilities of parties involved in the implementation of the program. The specific requirements of the program are then organized and described as a set of program elements.

2. Application and Implementation

This section provides information related to the application of the Hazard Communication program and the implementation of it throughout the campus.

2.1. Application

This program applies to any hazardous chemical which is known to be present at El Camino College in such a manner that employees may be exposed under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations.

Hazardous substances are classified and recognized based on the following sources:

1. Cal/OSHA Hazardous Substances List (CCR, Title 8, §339).
2. OSHA Toxic and Hazardous Substances List (Code of Federal Regulations (CFR), Title 29, §1910; Subpart Z).
3. ACGIH Threshold Limit Values (TLVs) for Chemical Substances in the Work Environment.
4. Chemicals specifically identified and regulated under Title 8, Article 107, Dusts, Fumes, Mists, Vapors and Gases, and Article 109, Hazardous Substances and Processes.
5. Office of Environmental Health Hazard Assessment (OEHHA) Proposition 65 List.

Hazardous substance manufacturers and importers must evaluate substances they produce or import to determine if they are hazardous. Employers are not required to evaluate substances unless they choose not to rely on the evaluation performed by the manufacturer or importer for the substance to satisfy this requirement. El Camino College has elected to rely on the hazardous substance manufacturers or importers to determine if a substance purchased by the college is hazardous. El Camino College will provide information to its employees about the hazardous chemicals to which they may be exposed, by means of a hazard communication program, labels and other forms of warning, SDSs, and information and training.

This program does not apply to:

1. any hazardous waste regulated by the Solid Waste Disposal Act, amended by the Resource Conservation and Recovery Act of 1976.
2. tobacco or tobacco products.
3. wood or wood products.
4. articles which may have been manufactured using hazardous substances.
5. food, drugs, or cosmetics intended for personal consumption by employees while in the workplace.
6. retail food sale establishments and all other retail trade establishments.
7. consumer products that are sold in the same form, approximate amount, concentration, and manner as it is sold to the general public.
8. pesticides.
9. work operations where employees only handle hazardous substances in sealed containers which are not opened under normal conditions of use (warehousing, shipping, receiving, etc.).

2.2. Implementation

The following describes how the program requirements are developed and implemented.

1. Identify departments and work operations where hazardous substances are used, handled, or stored. Develop and maintain a current inventory list of all known hazardous substances to which employees may be exposed.
 - *Responsibility:* Department deans, directors, assistant directors or supervisors with assistance from the Office of Workplace Safety and Risk Management.
2. Collect current SDSs for all hazardous substances listed on the workplace inventory.
 - *Responsibility:* Department deans, directors, assistant directors or supervisors with assistance from the Office of Workplace Safety and Risk Management.
3. Check original and secondary containers of hazardous substances to ensure they are properly labeled. Include Proposition 65 warning requirements, if applicable.
 - *Responsibility:* Department deans, directors, assistant directors or supervisors with assistance from the Office of Workplace Safety and Risk Management.
4. Provide training to all affected employees on the Hazard Communication regulation and on the hazardous substances that may be found at the work site. This training must include but is not limited to:
 - a. what SDSs are and how to interpret them.
 - b. proper labeling procedures.
 - c. employee protective measures including PPE.
 - d. signs and symptoms of excessive exposure.
 - *Responsibility:* Department deans, directors, assistant directors or supervisors with assistance from the Office of Workplace Safety and Risk Management.
5. In order to keep the written hazard communication program current:
 - a. update the inventory of hazardous substances and associated SDSs.
 - b. ensure training is conducted when new employees are hired.
 - c. ensure training is conducted whenever new hazardous substances are introduced into the workplace.
 - d. ensure new chemicals are received with proper labels and SDSs.
 - *Responsibility:* Department deans, directors, assistant directors or supervisors with assistance from the Office of Workplace Safety and Risk Management.

3. Roles & Responsibilities

The key responsibilities of the primary departments and employees involved in the implementation of this program are summarized below. More specific descriptions of requirements are provided in the various elements of this program. All departments and employees are responsible for doing their part in implementing this program as trained or otherwise communicated to them by their supervisors or District representatives.

3.1. Campus Departments/Supervisors

Key responsibilities include:

1. developing and maintaining an inventory of hazardous substances present in all work areas within the department.
2. maintaining SDSs in a location readily accessible to department employees. When ordering suspected hazardous substances, request an SDS whenever one is not currently on file.
3. ensuring hazardous substances are properly labeled.
4. developing and implementing work operation-specific safe work practices. A template for written safe work practices is provided in Appendix A.
5. Ensuring all employees covered by this program receive proper training before exposure to hazardous substances under normal conditions of use or in a foreseeable emergency.
6. maintaining records of training and compliance activities conducted.

3.2. Employees Involved in Covered Work Operations

Key responsibilities include:

1. Assisting in the identification of hazardous substances in work areas, including informing the department deans, directors, assistant directors or supervisors or the Office of Workplace Safety & Risk Management of changes to operations which result in exposures to new hazardous substances.
2. participating in training as indicated by the supervisor or the Office of Workplace Safety and Risk Management.
3. following safe work practices developed for work operations (inclusive of engineering controls and personal protective equipment (PPE)) and inform the department deans, directors, assistant directors or supervisors or the Office of Workplace Safety & Risk Management of any challenges or issues associated with implementation.

3.3. Office of Workplace Safety and Risk Management

Key responsibilities include:

1. maintaining this written program and associated records.
2. facilitating identification of work operations using hazardous substances and facilitate development of the inventory of hazardous substances and SDSs.
3. assisting departments in complying with program requirements including inventorying of hazardous substances, SDS, labeling, development of work operation specific safe work practices, employee information and training, and record keeping.

4. coordinating the collection and disposal of all hazardous waste generated on campus.

3.4. Facilities Planning and Services

Key responsibilities include:

1. ensuring that outside contractors work safely on El Camino College campus by giving information to outside contractors about hazardous substances to which they may be exposed, and protecting employees from hazardous substances used by outside contractors by obtaining information regarding hazardous substances used.

4. List of Hazardous Substances

Each department maintains a current list of hazardous substances present in the department. The list contains the chemical or common name which is indicated on the SDS for the substance to permit cross references to be made among the list of hazardous substances, the SDS, and the label.

In accordance with Proposition 65, El Camino College shall provide notice to employees if there are any substances known to cause cancer or birth defects used in the workplace. An employee may request to see a list of Proposition 65 chemicals used at a department. The state's current list of Proposition 65 substances is located at: <https://oehha.ca.gov/proposition-65/proposition-65-list>.

5. Safety Data Sheets

Each department maintains a copy of the SDS for each hazardous substance used in the department. The SDS contains useful information on the nature of the hazards and how to use, store, and dispose of the material. It also describes what protective measures to take while using the material and what first aid measures to follow if an exposure to the substance occurs. Departments ensure that this information is readily accessible during each work shift to employees when they are in their work area. If new and significant health or safety information becomes available, this new information is passed on to the affected employees by additional training, memorandums, or other means of communication.

5.1. Safety Data Sheet Contents

Safety data sheets should be reviewed for completeness and any missing information obtained from the manufacturer. The following section numbers and headings are required at a minimum for all SDSs:

1. Identification: identifies the chemical on the SDS, contact information of supplier, recommended use of chemical.
2. Hazard(s) Identification: identifies the hazards of the chemical with appropriate warnings including hazard classification, signal word, statement, pictograms, and descriptions.
3. Composition and Information on Ingredients: identifies the ingredients contained in the product including impurities and stabilizers.
4. First-Aid Measures: describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical.
5. Fire-Fighting Measures: provides recommendations for fighting a fire caused by the chemical.
6. Accidental Release Measures: provides recommendations on the appropriate response to spills, leaks, or releases including containment and cleanup practices to prevent or minimize exposure.
7. Handling and Storage: provides guidance on the safe handling practices and conditions for safe storage of chemicals.
8. Exposure Controls/Personal Protection: indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure.
9. Physical and Chemical Properties: identifies physical and chemical properties associated with the substance or mixture.
10. Stability and Reactivity: describes the reactivity hazards of the chemical and the chemical stability information (reactivity, stability, other).
11. Toxicological Information: identifies toxicological and health effects information or indicates that such data are not available.
12. Ecological Information: provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment.
13. Disposal Considerations: provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices.
14. Transport Information: provides guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea.

15. Regulatory Information: identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS.
16. Other Information: indicates when the SDS was prepared or when the last known revision was made.

5.2. Trade Secrets

Under certain circumstances, the manufacturer may withhold the specific chemical identity, including the chemical name and other specific identification of a hazardous substance, from the SDS. However, when a treating physician determines that a medical emergency exists and the chemical identity is required for first-aid treatment, the manufacturer must disclose the trade secret information to the physician.










6. Labels and Other Forms of Warning

Labels and other forms of warnings such as tags or markings are used to clearly communicate the presence of a hazardous substance, its hazards, and safety precautions. See Application and Implementation (Section 2) for items for which labeling requirements do not apply.

6.1. Labeling of Primary Containers

Each department ensures, that before hazardous substance containers are released to the work area, all primary containers are labeled with the required information as described below. The primary container is the original container in which a chemical arrives from the supplier. Labels and other forms of warning are to be legible and conspicuously placed on containers. Labels should not be removed and, if torn or defaced, they must be replaced.


1. Product identifier (identification of the hazardous substance): The product identifier is how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the SDS (Identification).
2. Signal word: The signal word is used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, "Danger" and "Warning." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" should appear on the label.
3. Hazard warning(s) / statement(s): The hazard warning describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard e.g. "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.") All applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards, no matter what the chemical is or who produces it.
4. Pictogram(s): OSHA has designated pictograms under this standard for application to a hazard category. OSHA's required pictograms must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label. The pictograms OSHA has adopted improve worker safety and health, conform with the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals, and are used worldwide. While the GHS uses a total of nine pictograms, OSHA only enforces the use of eight; the environmental pictogram is not mandatory but may be used to provide additional information.

<p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> • Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

5. Precautionary statement(s): The precautionary statement is a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.
6. Contact info of manufacturer, importer, or other responsible party: The name, address, and telephone number of the manufacturer, importer, or other responsible party should be included.



The following is a sample of a label identifying the required label elements.

SAMPLE LABEL

CODE _____ Product Name _____	}	Product Identifier	Hazard Pictograms 
Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____	}	Supplier Identification	
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.			Signal Word Danger
In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish. First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.			Highly flammable liquid and vapor. May cause liver and kidney damage.
Precautionary Statements			Hazard Statements
Supplemental Information Directions for Use _____ _____ _____			Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____

The example below demonstrates a completed label containing all of the required elements:

OXI252
(disodiumflammy)
CAS #: 111-11-11xx

	
Danger May cause fire or explosion; strong oxidizer Causes severe skin burns and eye damage	

Keep away from heat. Keep away from clothing and other combustible materials. Take any precaution to avoid mixing with combustibles. Wear protective neoprene gloves, safety goggles and face shield with chin guard. Wear fire/flame resistant clothing. Do not breathe dust or mists. Wash arms, hands and face thoroughly after handling. Store locked up. Dispose of contents and container in accordance with local, state and federal regulations.

First aid:
 IF ON SKIN (or hair) or clothing⁶: Rinse immediately contaminated clothing and skin with plenty of water before removing clothes. Wash contaminated clothing before reuse.
 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
 IF INHALED: Remove person to fresh air and keep comfortable for breathing.
 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
 Immediately call poison center.
 Specific Treatment: Treat with doctor-prescribed burn cream.

Fire:
 In case of fire: Use water spray. In case of major fire and large quantities: Evacuate area. Fight fire remotely due to the risk of explosion.

Great Chemical Company, 55 Main Street, Anywhere, CT 064XX Telephone (888) 777-8888

6.2. Labeling of Secondary Containers

Once a chemical has been transferred from its original or primary container (in which it arrived from the supplier) to a new one, that container is considered secondary. Some examples of secondary containers include chemical transfer containers (such as a beaker or test tube in a laboratory), spray bottles, large stationary tanks and smaller containers used to store chemicals that arrived in larger primary containers. Ideally, secondary chemical containers should follow the same GHS chemical container label guidelines described above for primary containers with a few exceptions as described below. At a minimum, secondary containers should have the following information:

1. Product identifier (name/identification of the hazardous substance) - The same product identifier must be both on the label and in the safety data sheet.
2. Hazard warning - Words or pictures that show the key physical and health hazards (e.g., eye hazard, skin hazard, flammable, etc.).

Secondary containers that are intended for immediate use and used by the employee who transferred the contents from the primary container do not need to be labeled (e.g., a bucket or tub used to dilute solvents for cleaning during the same shift does not need to be labeled).

6.3. Labeled/Unlabeled Pipes

Above-ground pipes transporting hazardous substances (gases, vapors, liquids, semi-liquids, or plastics) are identified in accordance with T8 CCR, Section 3321, "Identification of Piping." Employees working with the pipes (including pipes that do not contain hazardous substances but may have associated hazards if disturbed or cut (e.g., steam lines, oxygen lines) must be notified of the compounds in the pipe, potential hazards, and necessary safety precautions. Appropriate labels are used for labeling pipes and piping systems throughout El Camino College. See specific color labels specified by Cal/OSHA for different hazardous materials in the table below. Additionally, arrows are affixed on the pipe identification markers to indicate the flow direction of the material within the piping system.

Cal/OSHA Hazard Colors		
Color	Hazard	Examples
RED	Fire protection materials	Sprinkler systems, water
YELLOW	Hazardous materials to life and safety	Natural gas, boiler feed, hydraulic oil lines
BLUE	Low hazard gases	Compressed air, low pressure, nitrogen gas
GREEN	Low hazard liquids	Chilled water, domestic water, roof and sanitary, drains

7. Employee Information and Training

The Office of Workplace Safety & Risk Management provides training to employees on Hazard Communication. Additionally, each department provides employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard is introduced into their work area. Information and training relate to general classes of hazardous chemicals to the extent appropriate and related to reasonably foreseeable exposures of the job. Chemical-specific information must always be available through labels and SDSs.

7.1. Training Topics

Training includes, at a minimum, information on the following:

1. The requirements of the hazard communication regulation.
2. Any operation in the employee's work area, including nonroutine tasks where hazardous substances or Proposition 65 carcinogens or reproductive toxins are present and exposures are likely to occur.
3. Location and availability of the written Hazard Communication Program, including the list(s) of hazardous chemicals and safety data sheets.
4. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area (such as monitoring conducted by the department, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).
5. Physical and health effects of the hazardous substances, and symptoms of overexposure.
6. Measures employees need to take to protect themselves from these hazardous substances, including specific procedures the department has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used by engineering controls, work practices, and use of personal protective equipment. This information can be communicated via written safe work practices for specific areas and operations. A template for written safe work practices is provided in Appendix A.
7. How to read labels to obtain hazard information, how an employee might use the labels, and general understanding of how the elements work together on a label.
 - a. How information on the label can be used to ensure proper storage of hazardous chemicals.
 - b. How the information on the label might be used to quickly locate information on first aid when needed by employees or emergency personnel.
 - c. Explain that where a chemical has multiple hazards, different pictograms are used to identify the various hazards. The employee should expect to see the appropriate pictogram for the corresponding hazard class.
 - d. Explain that when there are similar precautionary statements, the one providing the most protective information will be included on the label.
8. How to review SDSs to obtain hazard information.
9. Employee rights:

- a. To personally receive information regarding hazardous chemicals to which they may be exposed
- b. For their physician or collective bargaining agent to receive information regarding hazardous chemicals to which the employee may be exposed
- c. Against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act

7.2. Training Times

Each department provides employees with information and training on hazardous substances in their work area at the following times:

1. Time of their initial assignment.
2. Whenever a new hazard is introduced into their work area.
3. Whenever employees might be exposed to hazards at another employer's work site.
4. Whenever a new or revised SDS is received. This information is provided in a timely manner, not to exceed 30 days after receipt, if the new information indicates significantly increased risks to employee health, or increased measures to protect employee health, as compared to those stated on a previously provided SDS.
5. Whenever employees are required to perform hazardous non-routine tasks (see below).

7.3. Hazardous Non-Routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees will be given information by their manager or supervisor regarding hazards to which they may be exposed during such an activity. This information will cover:

1. specific hazards related to the task.
2. measures the department has taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program, and establishing emergency procedures.

8. Contractors

The Hazard Communication Standard applies to contractors, vendors, and other service companies (e.g., outside cleaners, pest control, construction/renovation) that perform work for El Camino College. To ensure that outside contractors work safely on El Camino College campus, and to protect employees from chemicals used by outside contractors, Facilities Planning and Services is responsible for giving and receiving the following information:

- a. Hazardous substances to which contractors may be exposed while on the job site. To this end, Facilities Planning and Services will provide contractors with information on the labeling system and access to SDSs. In addition, contractors may be required to attend safety trainings as deemed necessary.
- b. Hazardous substances contractors will be bringing into the workplace. To this end, Facilities Planning and Services will request from contractors a list of hazardous substances the contractor intends to use at El Camino College, the SDSs for the hazardous substances, and ensure that containers are properly labeled. El Camino College reserves the right to deny use of any chemical which is deemed hazardous and may affect employees, students, or visitors on campus.

Appendix A

Safe Work Practices Template

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