SAINT MARY’S COLLEGE OF CALIFORNIA
HAZARD COMMUNICATION PROGRAM

March 2014

Saint Mary’s College of California
1928 St. Mary’s Road
Moraga, CA  94556

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Director of EH&S
APPROVAL SIGNATURE PAGE

HAZARD COMMUNICATION PROGRAM

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Policy Statement and Scope

It is the policy and practice of Saint Mary’s College of California (SMC) to control chemical hazards in the workplace to the greatest extent feasible. SMC has developed this Hazard Communication Program to ensure that employee health is protected from hazardous materials by effectively informing and training employees about the potentially hazardous substances in the workplace. As a California employer, SMC is complying with the General Industry Safety Orders, Section 5194, of Title 8 of the California Code of Regulations (CCR), by providing and maintaining this Hazard Communication Program in all work areas where employees may be potentially exposed to hazardous substances.

This Hazard Communication Program includes the following elements:

- Program responsibilities;
- A discussion of how to use Material Safety Data Sheets (MSDS) and Safety Data Sheets (SDS) and where to find them
- Labeling of hazardous materials containers
- Training requirements for SMC employees
- Additional information and procedures necessary for the safe handling and use of hazardous substances

This written Hazard Communication Program is available upon request to all SMC employees, their designated representative(s), the California Occupational Safety and Health Administration (Cal/OSHA), and the National Institute for Occupational Safety and Health (NIOSH), in accordance with 8 CCR Section 5194 (e) (3). No employee will be discharged or otherwise discriminated against for exercising his/her rights afforded by this program.

This Hazard Communication Program is for the following location and all locations where SMC operates:

Saint Mary’s College of California, 1928 St. Mary’s Road, Moraga, CA 94575

Saint Mary’s College of California satellite offices, 380 Moraga Road, Moraga, Ca 94556

This written Hazard Communication Program was developed to include:

- Material Safety Data Sheets and Safety Data Sheets information
- Container labeling/storage
- Employee information and training
- Chemical Safety Policy and a list of hazardous substances
- Proposition 65 information
Program Responsibilities

SMC management is ultimately responsible for ensuring a safe, healthful, and environmentally responsible workplace. SMC’s management staff recognizes this responsibility and is committed to providing the resources necessary to achieve this goal.

Management

Management is responsible in providing general oversight for the Hazard Communication Program, such as:

- Monitoring program effectiveness and maintaining program records; and
- Maintaining revised and updated copies of this document.

Program Administrator

The Program Administrator (Director, Environmental Health and Safety) is responsible for coordinating the Hazard Communication Program, specifically the development, communication, and recordkeeping aspects. The Program Administrator is responsible for:

- Documenting and coordinating actions relating to employee reports of hazardous or unsafe conditions
- Ensuring all employees (new and transferred) are trained in all aspects of the Hazard Communication Standard, and trained specifically about the hazards of the substances in their work area
- Ensuring that all Managers and Supervisors are trained on the safety and health hazards to which employees under their direction or supervision may be exposed
- Acting as, or assisting as necessary, the Incident Commander, during emergencies
- Conducting accident investigations following an accident
- Coordinating training for all employees on this program
- Ensuring that Safe Work Practices and Standard Operating Procedures (SOPs) are developed, implemented, and followed in order to minimize or eliminate potential employee exposures to hazardous chemicals
- Training employees performing non-routine tasks prior to commencement of the tasks
- Verifying that containers, equipment and storage cabinets are labeled appropriately
- Ensuring that unlabeled products or waste, which have been identified as containing hazardous substances, are not released for use until containers are clearly labeled and appropriate hazard warnings are affixed
- Ensuring that employees are provided and trained in the proper use of personal protective equipment
• Ensuring that personal protective equipment that is required is maintained, readily available for use and worn appropriately
• Obtaining approval from Management for new chemical purchase/use prior to ordering
• Ensuring MSDSs and SDSs are obtained for all chemicals procured and used
• Distributing new or revised MSDSs and SDSs to the appropriate job site as necessary
• Maintaining a complete and current set of MSDSs and SDSs online
• Maintaining a complete listing and inventory of all chemicals used/stored onsite
• Ensuring that contractors provide SMC with all of the appropriate paperwork (including MSDSs and SDSs) and chemical hazard documentation prior to the commencement of work
• Restricting access and use of maintenance chemicals to appropriately trained personnel
• Maintaining employee training documentation and for medical surveillance records for a period of thirty years beyond employment

**Supervisor**

The Supervisor is responsible for the following:

• Supporting the Program Administrator in the implementation of the Hazard Communication Program
• Supporting the Program Administrator in providing job-specific training to all employees working with chemicals as part of their routine work tasks
• Coordinating with the Program Administrator on employee reports of hazardous or unsafe conditions
• Verifying that all containers, equipment and storage cabinets are labeled appropriately
• Specifying the appropriate personal protective equipment to be worn by employees for specific operations
• Ensuring that significant environmental, health and safety hazard information for hazardous chemicals is disseminated to employees
• Reviewing of MSDSs and SDSs for new chemicals prior to purchase for significant environmental, health and safety hazard information and ensuring that this information is disseminated to employees
• Training employees in proper understanding and use of MSDSs and SDSs
• Addressing employee questions/concerns regarding the handling and disposal of hazardous waste
Employees

Employees should be alert to the potential hazards of all the materials in their work areas. Responsibilities include:

- Referring to the MSDS and SDS for specific information concerning the hazardous chemicals with which they work
- Following Safe Work Practices that have been established to protect their health and safety
- Wearing all required personal protective equipment and/or clothing properly
- Maintaining personal protective equipment that is in their control, or notifying their supervisor if the equipment is defective in any way
- Actively participating in and completing all training required under the Hazard Communication Program
- Contacting their Supervisor if they have any questions regarding the hazards associated with their work
- Reporting to their Supervisor any newly discovered inconsistencies or deficiencies in the administration or practice of the Hazard Communication Program

Contractors

To ensure the safety of contractors working at the SMC’s campus, the Supervisor will provide all contractors working on-site with the appropriate information pertaining to hazardous chemicals and/or processes, which they may encounter.

To ensure the safety of contractors working in specific areas within SMC’s campus, the Supervisors must make the following information available and document that was provided to contractors before they begin the work (if applicable):

- Precautions and protective measures to be utilized while working in specific areas
- Personal protective equipment requirements
- Safety program/procedure requirements for specific locations or activities
- Access to MSDSs and SDSs for each hazardous substance contractors may be exposed to while working
- Labeling systems used at the job site
- Emergency procedures and contact lists

Contractors who use hazardous substances will make the following available to the Supervisor prior to the start of work:

- MSDSs and SDSs for each material used during the job
- An explanation of the labeling and/or warning system used to identify hazardous chemicals or materials
• Information on hazardous work performed by the contractor (e.g., welding, volatile solvent use, operating equipment powered by internal combustion engines, laser use, etc.)

• Contingency plan for isolating the construction/renovation area from adjacent occupied work areas and for preventing the release of hazardous materials to the environment (e.g., release of contaminated liquid to a storm drain)

Contractors are responsible for providing all personal protective equipment for their employees. All hazardous waste generated by the contractor must be removed and disposed of properly at the contractor’s selected facility. The contractor generating and disposing of the waste will furnish the Program Administrator with a transportation and disposal plan before actual hazardous waste removal.
Material Safety Data Sheets (MSDSs) and Safety Data Sheets (SDSs)

Material Safety Data Sheets (MSDSs) and Safety Data Sheets (SDSs) must be available for all hazardous substances present in the work environment. MSDSs and SDSs are kept online for each hazardous substance listed on SMC’s chemical inventory. For each chemical, the MSDS and SDS is the most current version supplied by the manufacturer, importer, or distributor. MSDSs and SDSs are available to all employees in their work area for review during each work shift.

MSDSs and SDSs database can be accessed online at the link outlined below, using the Login Name, Password and Company ID credentials provided, as follows:

- Login Name: saintmarys
- Password: saintmarys
- Company ID: 1104

Login Page Link:
http://go.sitehawk.com

The Program Administrator is responsible for maintaining a master list of MSDSs and SDSs for all products used at main office or at the job sites. The Supervisor is responsible for ensuring MSDSs and SDSs for all chemicals are available for review. The contents of the MSDS are described in Appendix 1.

The Program Administrator reviews MSDSs and SDSs for new chemicals prior to purchase for significant environmental, health and safety hazard information and ensures that this information is disseminated to employees.

Policy for Obtaining and Accessing an Original MSDS

Prior to stocking new substances, or before free samples or no charge items are delivered to the job site, the buyer or responsible person must procure a MSDS or SDS from the manufacturer and supply a copy to the Program Administrator for review. The Program Administrator will review the MSDS or SDS, recommend approval or denial of the use of the chemical, and will ensure that the master files are updated, as necessary.

Employees and Supervisors should request an MSDS or SDS from the chemical manufacturer, the Program Administrator if they are missing an MSDS or SDS for any hazardous substance in their area.
Container Labeling/Storage

Labeling

Primary Containers

Definition: A primary container is the container in which the product is received from the manufacturer or distributor.

It is the policy of SMC that no primary container of hazardous substances will be used unless the following label information is present:

- Containers are clearly labeled as to the contents
- Appropriate hazard warnings are noted
- Name and address of the manufacturer are listed

The following is an example of a primary label.

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**ISOPROPYL ALCOHOL**

2-Propanol, IPA
(CH₃)₂CHOH

MW 60.10

HARMFUL IF INHALED OR SWALLOWED * CAUSES IRRITATION TO EYES, NOSE, THROAT, AND SKIN * AFFECTS CENTRAL NERVOUS SYSTEM * NONPHOTOCHEMICALLY REACTIVE

Keep away from heat, sparks, and flame. Keep container tightly closed. Use only with adequate ventilation. Avoid contact with eyes. Avoid prolonged or repeated breathing of vapors. Avoid prolonged or repeated contact with skin. Avoid contact with clothing. Do not take internally. Wash thoroughly after handling. Keep closures tight and upright to prevent leakage. Store in cool, dry, well ventilated location.

**FIRST AID:** In case of **skin contact**, remove any contaminated clothing. Wash skin with soap or any mild detergent and water for at least 15 minutes and get medical attention. In case of **eye contact**, flush with plenty of water for 15 minutes, lifting upper and lower eyelids. Get medical attention. If **inhaled**, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician. If **ingested** and victim conscious, give water to drink and induce vomiting if medical help is not available. Call a physician.

**SPILL PROCEDURES:** Absorb and flush with large volumes of water immediately. In case of fire, use water spray, alcohol foam, dry chemical, or CO₂.

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ADP Chemicals, Inc.
A DE Company
1992 DeEnt Boulevard
San Jose, CA 95131
408-555-4631
Emergency Number: CHEMTREC: 800-424-9300
Secondary Containers

**Definition:** A secondary container is the container in which the product is dispensed for use (e.g., squeeze bottle, spray bottles, flip-top containers).

To further ensure that employees are aware of the hazards of materials used in their work areas, it is the policy of SMC to label all secondary containers. Examples of secondary containers include squeeze bottles and flip-top containers. The Supervisor will ensure that all secondary containers are labeled with at least the following:

- Identity of the hazardous substance
- Appropriate hazard class (i.e., corrosive, flammable, etc.)
- Appropriate warnings

The following is an example of a secondary label for Isopropyl Alcohol:

```
ISOPROPYL ALCOHOL
DANGER -- FLAMMABLE

Can be irritating to the skin, eyes, and respiratory system.
Prolonged inhalation may cause central nervous system effects.
Flush eyes and skin with copious amounts of water, should contact occur.
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Labeling Systems

There are several acceptable labeling systems available for use. Among these is the National Fire Protection Association (NFPA) 704 labeling system, which provides chemical hazard information utilizing a color-coded diamond. This system is described in Appendix 2. Another method of labeling is the Hazardous Materials Identification System, which utilizes the same color-coded concept in a rectangular label.

Storage

It is SMC’s policy that all primary and secondary containers be closed or capped when not being used. All flammable substances, of any volume, are to be kept in a flammable storage cabinet when not being used or when the use of the chemical is complete. An inventory of all chemicals stored and used at SMC’s campus is provided in Appendix 3.
Employee Information and Training

Safety Orientation Training

Safety orientation training for all SMC employees consists of an overview of the requirements contained in the Hazard Communication Regulations, including their rights under regulations (8 CCR § 5194 (h)), such as:

- Information regarding hazardous substances to which they may be exposed and proper understanding and use of MSDSs and SDSs
- The right to receive information regarding hazardous substances to which the employee may be exposed
- Freedom from discharge or other discrimination due to the employee’s exercise of the rights afforded pursuant to the provisions of the standard
- Operations in their work area where hazardous substances are present
- Location and availability of this written Hazard Communication Program, including the list(s) of hazardous substances and MSDSs and SDSs
- Physical and health effects of the hazardous substances to which employees work with and/or might be exposed to
- Methods or techniques the employees can use to determine the presence or release of hazardous substances into the work area
- Types of appropriate safe work practices, emergency procedures, and personal protective equipment that can be used to decrease or prevent exposure to these hazardous substances
- Emergency and first aid procedures to follow if employees are exposed to hazardous substances
- How to read labels and review MSDSs SDSs to obtain appropriate hazard information
- How to react to a chemical spill, leak, or other exposure, including information specific to chemicals held in large quantities on-site. Information on where employees should go in the event of a chemical spill, leak, or other exposure should also be included

The Supervisor is responsible for coordinating all training required under this program. The Program Administrator is responsible for maintaining safety training records.

Job Specific Hazard Training

The Supervisor and will provide job-specific training to all employees working with chemicals as part of their routine work tasks.
Non-Routine Tasks

The Supervisor is responsible for training employees on performing non-routine tasks, during which they may be exposed to hazardous chemicals, prior to the commencement of the tasks. Training should include information on:

- Specific chemical hazards
- Protective measures that the employee must use
- Measures that have been taken to minimize the hazards involved with the tasks
Chemical Safety Policy

Policy

Chemicals in any form can be stored, handled, and used safely if their hazardous chemical and physical properties are fully understood. This is accomplished through engineering controls, administrative controls, and the use of appropriate personal protective equipment. If used improperly, chemicals used at SMC’s campus could cause serious injury if inhaled, absorbed through the skin, or ingested in sufficient quantities. For specific policies regarding working with hazardous chemicals, employees should contact their Supervisor.

Hazard Control

Chemical and physical hazards can be controlled through a combination of techniques. The most effective control method is the use of engineering controls (e.g., local exhaust ventilation and chemical isolation). A secondary control method is administrative controls (e.g., establishing safe work practices, designing safer procedures for processes, etc.). The final control method is the use of personal protective equipment such as chemical resistant gloves, safety glasses, respiratory protection, and protective clothing.

Storage and Use

Proper storage of chemicals will avoid a serious safety hazard. Incompatible chemical mixtures can result in fire, explosion or the release of toxic gases. By storing chemicals in separate storage areas, the potential for an incompatible reaction (e.g., through a spill) is avoided. For additional storage guidelines refer to the manufacturer's MSDS or SDS.

Each chemical container will be clearly labeled. Any container not labeled and unattended should be immediately reported to the Supervisor. Always read the warning label on the chemical container before use.

Disposal

All used chemical containers are to be emptied to the point where no drips or droplets can be detected, when the containers are inverted in any position. Only empty containers meeting the California empty definition of Title 22 Section 66261.7, not containing an acutely or extremely hazardous material, and equal to or less than 5-gallons are allowed to be disposed of as regular waste (trash). Empty containers larger than 5-gallons must be either sent to a recycler or a supplier for the purpose of refilling or disposing of as hazardous waste. Chemicals emptied from containers should be used for their intended purpose or treated as a possible hazardous waste. If you are unsure of how to handle waste chemicals, contact your Supervisor.
Emergency Response to Chemical Contact

All employees working with chemicals should familiarize themselves with the location of safety shower(s) and/or eyewash stations that can be reached within ten seconds in the event of chemical exposure to the skin or eyes. During job set up and tailgate safety meetings, the locations of safety shower(s) and/or eyewash stations will be noted and identified by all workers.

Non-affected employees should provide assistance to affected employees and, if necessary call 911 for emergency medical attention. The affected employee’s Supervisor must be notified as soon as possible following the incident. Direct or suspected chemical contact should be treated immediately following these procedures:

- Remove contaminated clothing; (Disposable Tyvek suits are available as temporary clothing.)
- Flush the affected area with water for at least 15 minutes
- Non-affected employees should provide assistance to the affected employee by referring to the emergency contact information provided in Appendix 4, and if necessary, call 911 for medical attention
- Notify the Incident Commander (if available) and then the affected employee’s Supervisor as soon as possible following the incident
Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)

Policy

SMC must warn employees before exposing them to any hazardous substance that requires warnings for chemicals known to the state of California to cause cancer or reproductive toxicity. By including information on hazard determination, labels and other forms of warning, MSDSs, SDSs and employee information and training, this written Hazard Communication program also complies with the Safe Drinking Water and Toxic Enforcement Act of 1986. If chemicals known to the State of California are used at the job site, then a written notification will need to be posted in areas that use chemicals that are part of the Proposition 65 list.
Appendix 1: Understanding Safety Data Sheets (SDS)

Introduction

Chemical manufacturers, distributors, or importers provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the new SDSs will be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*
Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 (29 CFR 1910.1200(g)(2)).
Appendix 2: NFPA Labeling System

The National Fire Protection Association (NFPA) 704 standard presents a hazard labeling system that incorporates information on toxicity, flammability, reactivity, and special hazards. This system was designed to provide uniform, clearly visible information to Fire Department personnel (e.g., fire fighters, inspectors). The following, adapted from the appendix of the NFPA standard, summarizes the hazard information.

The numbers from 0 through 4 are placed in the three upper squares of the diamond to show the degree of hazard present for each of the three hazard categories. The 0 indicates the lowest degree of hazard, and 4, the highest. The fourth square, at the bottom, is used for special information. Two symbols for this bottom space are recognized by NFPA 704 (See Figure). They are:

1. A letter $W$ with a bar ($\bar{W}$) indicates that a material may react with water. This does not mean “do not use water,” since some forms of water - fog or fine spray - may be used in many cases.
2. The letters $OX$ indicate an oxidizer.

Although not recognized by NFPA 704, some users will insert the letters $ALK$ for alkaline materials and $ACID$ for acidic materials.
Appendix 3: Chemical Inventory

The chemical inventory can be found in SMC’s Hazardous Material Business Plan. Please contact the Program Administrator for more information.
### Appendix 4: Emergency Contact Information

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Contact Number (Desk/Cell)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joseph Kehoe</td>
<td>Executive Director</td>
<td>(925) 631-4286/(925) 457-6360</td>
</tr>
<tr>
<td>Michael Viola</td>
<td>Associate Director</td>
<td>(925) 631-4286/(925) 878-1622</td>
</tr>
<tr>
<td>Safa Toma</td>
<td>EH&amp;S Director</td>
<td>(925) 631-8287/(925) 383-9300</td>
</tr>
<tr>
<td>Scott Logan</td>
<td>Superintendent</td>
<td>(925) 631-4915/(925) 324-9417</td>
</tr>
<tr>
<td>Trinka Courtemanche</td>
<td>Assistant Superintendent</td>
<td>(925) 631-4845/(925) 759-5398</td>
</tr>
</tbody>
</table>

- **Fire Department**
  - 911

- **Police**
  - 911

- **Ambulance**
  - 911