HAZARD COMMUNICATION PROGRAM

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ATTACHMENTS: California Code of Regulations Title 8, Section 5194 Safety Note 21 Safety Note 48

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I. INTRODUCTION

The University of California, Agriculture and Natural Resources (ANR) is committed to providing every employee a safe and healthy work environment. Evaluating and communicating potential hazardous substances in the workplace is an important component in establishing and maintaining a safe and healthy work environment. The following written Hazard Communication Program has been developed to comply with California Code of Regulations (CCR) Title 8, Section 5194. It is designed to help maintain a healthy work environment by increasing employee awareness of hazardous workplace substances, including chemicals, compressed gasses, asbestos, vehicle batteries, fuels, solvents and disinfectants, and their potential health effects, safe work practices, and emergency procedures. The Hazard Communication Program encompasses all use of hazardous substances within ANR except the following (CCR, Title 8, Section 5194(b)(5)):

- Laboratory reagents if there is a Chemical Hygiene Plan (CCR, Title 8, Section 5191);
- Hazardous waste regulated by the Environmental Protection Agency (42 U.S.C. 6901 et seq.)
- Tobacco or tobacco products;
- Wood or wood products which will not be saved or processed;
- Foods, drugs, or cosmetics intended for personal consumption by employees while in the workplace;
- Pesticides*; or
- Work operations where employees only handle substances in sealed containers which are not opened.
- * **Note:** CCR, Title 3, Section 6723 "Hazard Communication for Pesticide Handlers" requires a copy of a completed Written Hazard Communication Information for Employees Handling Pesticides in Agricultural Settings (Pesticide Safety Information Series leaflet A-8) to be complied with and on display.

II. POLICY

ANR is committed to assuring employees and other personnel conduct activities within safe work environments at all facilities. Accordingly, ANR has implemented this program to maintain compliance with the state regulatory program for hazardous communication (CCR, Title 8, Section 5194(e)).

III. SCOPE

Components of the Hazard Communication Program include:

- Responsibility
- List of hazardous chemicals.
- Labeling of hazardous chemicals.
- Safety Data Sheets (SDS) formerly known as "Material Safety Data Sheets or MSDS."
- Information and training.
- Non-routine hazardous tasks.
- Contractors and their employees.

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IV. PURPOSE

The purpose of this written program is to ensure that education and training is provided for all employees who are or potentially may be exposed to hazardous substances in the work place. This training shall be conducted prior to the first exposure to the substance/s (during on-the-job orientation and training), whenever a new hazardous substance is introduced into the work place and when there are changes to this plan. All employees will be informed of the location of the written Hazard Communication Program, hazardous substance listing, and SDS.

V. RESPONSIBILITY

Director or Supervisor

- Provide training and information, including ready access to SDSs, to anyone who may be affected by work with hazardous chemicals. This includes personnel from other departments, employers, or contractors who may be affected by ANR operations. Access shall be provided electronically or through hard copy available in the work area.
- Assure that all hazardous chemicals, regardless of amounts, are included in the facility's chemical inventory. Note: all ANR locations are encouraged to use UC's online Chemical Inventory System (CIS).

Employees

- Complete required training including the review of labels and SDSs prior to working with hazardous chemicals.
- Follow safe work practices and wear proper personal protective equipment (PPE) when working with hazardous chemicals.
- Request training when working with unfamiliar substances.
- Immediately report accidents, incidents (including near misses), and unsafe conditions to your supervisor.

Safety Coordinator

• Assist in the implementation of this program.

The ANR office of Environmental Health & Safety (EH&S) will provide resources to aid in compliance including forms, training materials, and access to SDS sources.

VI. LIST OF HAZARDOUS SUBSTANCES

Each ANR location will maintain a list that identifies current hazardous substances present in the workplace (CCR, Title 8, Section 5194(e)(1)(A)). This list must be updated as hazardous substances are added or deleted and must be reviewed periodically (at least annually). The list shall be kept with this written program and with SDS book(s) at each location, and serves as an index to aid employees in identifying and locating necessary information. This list should be compiled as an item-by-item inventory. Unless all items are included in this list, it is possible that some hazardous substances

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could be overlooked. UC has developed an online Chemical Inventory System (CIS) that ANR locations may use to meet the requirement of maintaining a list of hazardous substances. The list should include the following:

- The chemical and trade names.
- The manufacturer's name.
- Location (such areas as maintenance, shops, agricultural operations, laboratories, storage, etc.).
- Quantities.

VII. CONTAINER LABELING

ANR Supervisors have the responsibility to verify:

- That all chemical containers received, used or stored at their location are clearly labeled as to the contents and appropriate hazard warnings (CCR, Title 8, Section 5194(f)(10)) and all manufacturer's labels must have fully implemented the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals by June 2015. Each manufacturer label shall contain the following information:
 - o Product identifier;
 - o Signal word;
 - Hazard statement(s);
 - Pictogram(s);
 - Precautionary statement(s); and,
 - Name, address, and telephone number of the manufacturer, importer, or other responsible party.
- Labels on containers will not be removed until the container is empty (all residues have been removed from the container).
- Secondary containers are labeled in compliance with CCR, Title 8, Section 5194(f)(6) as follows:
 - Each container of a hazardous chemical must bear a label, in English, stating the identity of the chemical and the appropriate hazard warnings.
 - If a set of abbreviations is used routinely in the work area, definitions of the abbreviations must be posted in a prominent place in the work area.
 - All employees who transfer hazardous chemicals into portable containers (such as bottles, spray bottles, parts cleaning cans, etc) will ensure the containers are appropriately labeled and the contents identified
 - If secondary container is too small to practically place a label with contents and hazard information then the secondary container shall be placed inside a plastic bag along with a printed label that contains this information.
- Pesticides are labeled according to the Federal Insecticide, Fungicide and Rodenticide Act (no additional labeling is required according to the regulations; however, all pesticide containers must be labeled).

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VIII. SAFETY DATA SHEETS

It is the responsibility of ANR supervisors to obtain necessary SDS for all hazardous substances (including pesticides) so a SDS file or binder can be maintained in current status. This repository should be periodically checked and updated to ensure a current SDS for each hazardous substance is on file. The primary repository of this information will be maintained at each location's administrative office or headquarters. In addition, copies of the SDS for all hazardous substances to which employees may be exposed to may be kept using an online SDS service. The ANR EH&S website contains information about online SDS resources at: http://safety.ucanr.org/Plans, Forms and Templates/SDS/. Employees must be trained on how to operate devices for retrieval and printing of legible hard copies. The SDS file will be readily available for review by all employees during each work shift. SDS sheets must be made available to anyone requesting them for thirty (30) years after a hazardous substance is no longer in use. If a SDS is not available one will be requested from the vendor or manufacturer (CCR, Title 8, Section 5194(g)). If the vendor or manufacturer does not provide a SDS within 25 calendar days of the request, contact ANR EH&S for assistance.

In the event of an employee exposure to a hazardous substance, a copy of that substance's SDS shall be sent with the employee to the health care facility or sent separately to the health care facility. This can aid in the employee's treatment to the exposure.

IX. INFORMATION AND TRAINING

Employees will be provided information and training on any operations in their work area where hazardous substances are present, and the location of the written Hazard Communication Program, hazardous substance listing, and SDS (CCR, Title 8, Section 5194(h)). Training may be internet based, classroom based, or on-the-job, and must be provided prior to exposure to hazardous substances. Information and training may be designed to encompass categories of hazards (flammability, toxicity, etc.) or specific substances. Substance-specific information must always be available through labels and SDS. Training attendance must be documented.

Employee training will include at least the following:

- Details of the Hazard Communication Program, including the hazard communication standard, the location of this plan, the list of hazardous substances, and labeling of hazardous substances.
- The location of SDS, how employees can obtain, read, understand and use appropriate hazard information.
- The location(s) where hazardous chemicals are present.

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- Signs and symptoms associated with exposures to hazardous chemicals used in the work area.
- Methods and observations that are in place or may be used to detect the presence or release of a hazardous substance in the work area.
- The physical and health hazards of substances in the work area as well as hazards not otherwise classified.
- The measures employees can take to protect themselves from the hazards, such as work practices, emergency procedures, and personal protective equipment.
- Labeling, signage, placards, etc.
- Emergency and first-aid procedures to follow if employees are exposed to hazardous substances.
- Copies of the Pesticide Safety Information Series leaflets for employees who work with or handle pesticides (CCR, Title 3, Section 6723).
- The location and interpretation, if needed, of warning signs or placards.

If an employee is instructed to use a hazardous substance for which he/she has not been trained, it will be their responsibility to inform the employer prior to handling such material, so proper training can be provided.

Employees shall also be informed of the following rights:

- To personally receive information regarding hazardous substances to which they may be exposed, according to the provisions of this section;
- 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;
- 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.

Safety Notes <u>#21 Safety Data Sheets</u> and <u>#48 Hazard Communication Awareness</u>, Safety Video E/S-035, and online training may be used for general hazard communication training. General hazard communication training must also be supplemented with location-specific information such as the hazardous substances that are present, location of SDS and emergency medical procedures. Safety Notes and safety training videos are available from the ANR EH&S website (<u>http://safety.ucanr.edu</u>) on numerous related topics such as personal protective equipment, laboratory safety, eye protection, fume hood use, and spill response. ANR locations should use these resources and their local information in training their employees. A signed record of training for employees will be kept in the workplace.

X. NON-ROUTINE HAZARDOUS TASKS

Since many tasks are not done on a routine basis they will be handled through specific pre-task actions

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and training. Before performing non-routine tasks, the supervisor in charge will review applicable SDS; instruct employees in the associated hazards and recommended first aid treatment; and assure all essential personal protective and emergency equipment is available and operational (CCR, Title 8, Section 5194 (e)(1)(B)). Supervisors will notify all other employees working in this area that non-routine tasks are scheduled and/or being performed.

XI. CONTRACTORS AND THEIR EMPLOYEES

Any contractors working in an ANR facility or jobsite in areas where they may be exposed to hazardous substances will be informed of the written Hazard Communication Program and where to locate SDS. It will be the responsibility of the contractor to properly train their employees in their hazard communication and/or emergency procedures for these substances.

In addition, contractors working on an ANR facility are required to provide a list of hazardous substances and make available copies of all SDS for hazardous substances they are bringing on the jobsite so the information is accessible to all employees. It is preferable to have each subcontractor bring their SDS in a binder labeled with the contractor's name.