



# **Hazard Communication (HazCom) Program Santa Monica Community College District**

**Safety & Risk Management Department**

**January 2022**

As required by California's Hazard Communication (HazCom) Regulation (T8 CCR 5194), Santa Monica Community College has developed this Hazard Communication Program, which we implement and maintain as an important component of our Injury and Illness Prevention Program (T8 CCR section 3203) to enhance our employees' health and safety. The Hazard Communication Program manager, Director of Safety & Risk Management, has full authority and responsibility for implementing and maintaining this program.

Our goal is to provide information to all personnel on our worksite — including other employers and their employees — about the hazardous chemicals in our workplace, the associated hazards, and the control of these hazards through a program that includes the elements listed below. We expect contractors bringing hazardous chemicals into our workplace to do the same via their own written HazCom Program.

### **List of hazardous chemicals**

The Director of Safety & Risk Management will prepare and keep current a list of all known hazardous chemicals present in our workplace that are in use or storage (see attached *Hazardous Chemical List*) and, at the same time, verify that we have the most current safety data sheets (SDSs). The product identifiers listed will match those on the corresponding container labels and SDSs. Specific information on each noted hazardous chemical can be obtained by reviewing the corresponding label and SDS.

### **Proposition 65 list of chemicals**

The Director of Safety & Risk Management is responsible for obtaining updates of Prop 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Prop 65 list, the additional warning requirements will take effect within 12 months from the date of listing.

### **Safety Data Sheets (SDSs)**

The Director of Safety & Risk Management is responsible for obtaining the SDSs corresponding to our *Hazardous Chemical List*, reviewing them for completeness, and maintaining the safety data sheet system for our company.

Should a SDS not be received with or prior to receipt of the initial shipment of a hazardous chemical, or with the first shipment after a safety data sheet is updated, a SDS will be requested as soon as possible from the manufacturer or distributor. If the SDS(s) is still not provided upon request, the manufacturer or distributor will, within seven days of noting this missing information, be requested in writing to provide the required information. The Director of Safety & Risk Management will forward a copy of this written request to Cal/OSHA if a response is not received from the manufacturer or distributor within 25 days.

Division of Occupational Safety and Health  
Deputy Chief of Health and Engineering Services  
1515 Clay Street, Room 1901  
Oakland, CA 94612

If a new or revised SDS is received that indicates significantly increased risks or measures needed to protect employee health, that information will be conveyed to employees within 30 days by Risk Management.

If we become aware of any significant information regarding the hazards of a chemical, or ways to protect against the hazards, this new information will be added to the SDS within three months.

Legible SDS copies for all hazardous chemicals to which employees of SMC may be exposed are kept in an online database called SafeColleges. All employees have access to computers where they can find our database of SDSs and download the SDS as necessary. SDSs are readily available for review by all employees in their work area and during each work shift without the need to ask someone.

Employees are to contact the Director of Safety & Risk Management if they have a specific question or need additional information on a SDS.

## Labels and other forms of warning

Before hazardous chemical containers are released to the work area, it is the policy of SMC that each area that uses chemicals will have a trained individual who has been provided administrative access to the SafeColleges database will verify that all containers are properly labeled as follows.

- Original containers received from the manufacturer, distributor, importer:
  - Product identifier
  - Signal words
  - Hazard statements
  - Pictograms
  - Precautionary statements
  - Name, address, and telephone number of the manufacturer, importer, or other responsible party
- Workplace containers where the contents of the original containers received from the manufacturer, distributor, importer have been transferred into one of our own containers:
  - Product identifier
  - Words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical

We will not remove or intentionally deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

Portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer are not required to be labeled.

Each department who has been trained to create secondary labels from our SafeColleges database will utilize the following procedures to review and update label information when necessary:

- SafeColleges SDS database provides an electronic GHS compliant internal application which allows the user to create GHS compliant secondary labels specific to the SDS being referenced.
- The departmental staff who have been provided administrative access to the SafeColleges database have been trained to create GHS compliant secondary labels through the SafeColleges database.

If we become newly aware of any significant information regarding the hazards of a chemical, we will revise the labels for the chemical within six months of becoming aware of the new information.

To address exposures to Proposition 65 chemicals that do not fall under the requirements of the Cal/OSHA section 5194 Hazard Communication regulation, The Director of Safety & Risk Management will:

- Providing a warning to employees in compliance with California Code of Regulations Title 22 (22 CCR) Section 12601(c) in effect on May 9, 1991.

## Employee information and training

Employees are to attend a HazCom program training session set up by Safety & Risk Management at the time of their initial assignment and whenever a new chemical hazard is introduced into the work area. This training session will be performed either online through SafeColleges or via in class training and provide information on:

- The requirements of the Hazard Communication regulation, including the employees' rights under the regulation.
- The location and availability of the written HazCom Program and list of hazardous chemicals and SDSs. Included here

will be how this information will be addressed when there are other employer activities at the work site.

- Any operation in the employees' work area, including non-routine tasks, where hazardous chemicals or Proposition 65 carcinogens/reproductive toxins are present and exposures are likely to occur.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- Protective practices the company has taken to minimize or prevent exposure to these substances.
- The details of our HazCom Program, including how to read labels and review SDSs to obtain hazard information, and an overview of our workplace-specific labeling procedures for original and workplace containers, as well as stationary processes.
- Physical and health effects of the hazardous chemicals either individually or as hazard groups. Chemical-specific information will always be available through labels and safety data sheets.
- Symptoms of overexposure.
- Measures employees need to put into practice to reduce or prevent exposure to these hazardous chemicals by engineering controls, work practices, and use of personal protective equipment.
- Emergency and first aid procedures to follow if employees are exposed to hazardous chemicals.
- The location and interpretation, if needed, of warning signs or placards to communicate that a chemical known to cause cancer or reproductive toxicity is used in the workplace.

Employees will receive additional training as soon as possible when a new hazard is introduced into the workplace or whenever employees might be exposed to hazards at another employer's worksite.

### **Hazardous non-routine tasks**

Periodically, our 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 on the hazards to which they may be exposed during such an activity.

This information will cover:

- Specific hazards.
  - Measures SMC has taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program that meets T8 section 5144 requirements, and establishing emergency procedures.
- Required protective/safety measures.

### **Labeled/unlabeled pipes**

Above-ground pipes transporting hazardous chemicals (gases, vapors, liquids, semi-liquids, and plastics) will be identified in accordance with T8 CCR, section 3321, "Identification of Piping."

Before employees enter the area and initiate work on or near pipes, staff supervisor will inform them of:

- The location of the pipe or piping system or other known safety hazard.
- The chemicals in the pipe.
- Potential hazards.
- Safety precautions.

Employees are to contact Safety & Risk Management if they have questions about this plan or wishes to review it. Our plan will be maintained by Safety & Risk Management to ensure that the policies are carried out and the plan is effective.

---

[Signature of Owner or Top Management Representative