

**IMPERIAL VALLEY
COLLEGE**

**Hazard Communication
Program**

April 20, 2004

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I. Purpose of Written Hazard Communication Program for Imperial Valley College

The purpose of the Written Hazard Communication Program is to describe the methods used to implement the Hazard Communication Program. This document outlines how each of the requirements set forth in the OSHA Hazard Communication (H.C.S.), 29 CFR 1910.1200 will be met at Imperial Valley College.

II. Container Labeling

Imperial Valley College will meet the H.C.S. requirements for container labeling on our campus in the following manner:

- A. The Division Chair for the Industrial Technology Division will be responsible for ensuring labeling of in-plant containers used within the Industrial Technology Department.
- B. The Science/Laboratory Technician will be responsible for ensuring labeling of in-plant containers used within the Science Department.
- C. The Director of Maintenance & Operations will be responsible for ensuring labeling of in-plant containers used within all other areas of the campus.
- D. Each container of hazardous material at this campus received from an outside supplier will be clearly labeled with:
 - 1) Identity of hazardous chemical(s).
 - 2) Appropriate hazard warnings.
 - 3) Name and address of the manufacturer.
- E. Each non-empty container of hazardous materials in the facility, including mixing tanks, storage tanks, drums, bags, bottles, and boxes will have a label attached to it.
- F. Labels provided by vendors on incoming containers will not be defaced or removed. Imperial Valley College does not accept shipments of hazardous material without proper labeling. Any containers of hazardous materials that

are received without proper labeling are impounded in a designated area of the campus and will not be released for use until such time as proper labels can be applied. If vendor labels are not available, a special label bearing the information in "D" above should be filled out and attached. Portable container labels may be used for this purpose. (See page 3 of the Hazard Communication Handbook for a sample of a portable container label.)

- G. Whenever hazardous materials are transferred into portable containers, the person transferring the material should attach a portable container label to the new container. The label must include the name of the product, identity of the hazardous chemical contained and applicable hazard warnings. If the person transferring the material is uncertain of the identity of the material and the applicable hazard warnings, he or she should contact his or her supervisor.

III. Material Safety Data Sheets

Imperial Valley College meets the H.C.S. requirements for Material Safety Data Sheets (MSDSs) as an employer in the following manner:

- A. The Division Chair for the Industrial Technology Division will be responsible for maintaining the file of MSDSs for hazardous chemicals used in the Industrial Technology Department. These MSDSs will be kept in the Industrial Technology Division Office (1104) and will be organized by product name, which is the same name used on the product label on the container.
- B. The Science/Laboratory Technician will be responsible for maintaining the file of MSDSs for hazardous chemicals used in the Science Department. These MSDSs will be kept in the Science Prep Room (406C) and will be organized by product name, which is the same name used on the product label on the container.
- C. The Maintenance & Operations Director will be responsible for maintaining the master file of MSDSs for hazardous chemicals used. These MSDSs will be kept in the Maintenance Office and will be organized by product name, which is the same name used on the product label on the container.
- D. The receiving department, as well as any other department that has material drop shipped or delivered directly to their department will be responsible for supplying the Maintenance & Operations Director with copies of any MSDS sheets that are received. A request for MSDSs shall be included with all orders that are placed by any department or individual.

- E. The Maintenance & Operations Director, the Science/Laboratory Technician, and the Division Chair for the Industrial Technology Division will review the MSDSs as they are received for new information and accuracy. If any parts of the MSDSs are missing or incomplete, the Maintenance & Operations Director, the Science/Laboratory Technician, and the Division Chair for the Industrial Technology Division should request a new MSDS from the manufacturer. If the requested new MSDS is not received or complete, the Maintenance & Operations Director, the Science/Laboratory Technician, and the Division Chair for the Industrial Technology Division should notify OSHA. If new hazard and/or safety information is received on an MSDS, the Maintenance & Operations Director, the Science/Laboratory Technician, and the Division Chair for the Industrial Technology Division are responsible for informing employees of the new information on hazards or safety introduced into their work area.

- F. MSDSs are available to all employees for review during each work shift. MSDS sheets and right to know centers are located at The Water Treatment Plant, Maintenance Office, Custodial Store Room in Maintenance Area, Room 406C, Office 1104, Room 1306, 2100 Custodial Room, and Storeroom 615. These Right To Know Centers contain MSDS sheets specific to the substances used in these areas. The MSDS Master File will be maintained in the Maintenance Office. For access to the Master MSDS File, please contact The Maintenance & Operations Director at extension 371 or (760) 455-9267. For access to any of these files after 5:00 pm Monday through Friday, please contact the Custodial Supervisor by calling the Switchboard Operator (0) or by pager # (760) 332-1573.

IV. Employee Information and Training

Imperial Valley College meets the H.C.S. requirements for employee information and training in the following manner:

- A. All new faculty members are to attend a health and safety orientation, to be organized by the Vice President for Academic Services prior to starting their work assignment. All other employees will be provided with information and training on hazardous chemicals in their work area by their immediate supervisor at the time of their initial assignment.

- B. The Director of Maintenance & Operations will be responsible for conducting Hazardous Communications training sessions for all administrators and supervisors at this campus.

- C. The Vice President for Academic Services and all Supervisors will be responsible for conducting Hazardous Communications training sessions for employees under their direct supervision.
- D. The Hazardous Communication Information and Training Program will be accomplished at this campus through videotaped instruction, discussion of items specific to this campus, and a thorough review. All department heads and division chairs will retain a copy of the written Hazardous Communication Plan as well as a copy of the Hazard Communication Handbook to refer to if employees have any questions. Copies of both documents can be obtained from the Human Resources Department at ext. 212.
- E. An outline of training sessions provided at this campus will include but not be limited to the following:
- Explanation of the OSHA Hazard Communication Standard including their rights under the regulation.
 - Educate employees about operations in their work area where they may come into contact with hazardous chemicals.
 - Explain where and how to access the Written Hazard Communication Program as well as Material Safety Data Sheets.
 - Explain how to recognize a hazard warning and methods used to determine the presence or release of hazardous substances in the work area.
 - Explain how to read a label for hazard information.
 - Review Material Safety Data Sheets and their use.
 - Review possible physical and health effects of the hazardous substances.
 - Explain how to lessen or prevent exposure to hazardous substances through the usage of safe work practices, and/or the use of personal protective equipment.
 - Review the steps taken by the district to lessen or prevent exposure to these substances.
 - Review emergency and first aid procedures to be used if employees are exposed to a hazardous substance(s).
- F. Attendance will be recorded for participation in the training sessions and will be kept on file by the Director of Human Resources.
- G. For information and training about hazards associated with non-routine tasks, see section VI, titled: **Hazards of Non-Routine Tasks.**

V. List of Hazardous Chemicals

Imperial Valley College meets the H.C.S. requirement for the List of Hazardous Chemicals in the following manner:

- A. The list of known hazardous chemicals for this campus will be maintained and located in the Maintenance Office by The Director of Maintenance & Operations. This information can also be found in the Imperial Valley College Business Plan located at the Imperial County Office of Environmental and Health Services.
- B. More information on each hazardous chemical can be found by reviewing the MSDS for that product.

VI. Hazards of Non-Routine Tasks

Imperial Valley College meets the H.C.S. requirements of informing employees about the hazards of non-routine tasks in the following manner:

- A. It is the policy of Imperial Valley College to inform employees of potential hazards associated with non-routine tasks and work on or with unlabeled pipes and to advise them of the necessary personal protective equipment to accomplish such tasks.
- B. Employees are informed of these hazards by contacting the Director of Maintenance and Operations prior to starting the assigned work. Upon contacting the Director of Maintenance and Operations, the following procedure will be followed:
 - 1. Discuss potential hazards of activity.
 - 2. Review the MSDS of any hazardous chemical involved in the non-routine work.
 - 3. Review safety precautions that should be taken during this activity.

VII. On-Site Contractors

Imperial Valley College meets the H.C.S. requirements for informing on-site contractors about hazardous chemicals to which their employees may be exposed in the following manner:

- A. It is the responsibility of the Director of Maintenance and Operations to furnish the on-site contractor with the following:
- Description of hazardous chemicals to which the contractor's employees may be exposed.
 - Suggestions for appropriate protective measures.
- B. Likewise, on-site contractors will furnish Imperial Valley College with the following:
- Description of any hazardous chemicals brought onto Imperial Valley College's property to which Imperial Valley College's employees may be exposed.
 - Suggestions for appropriate protective measures.
- C. The contractor must sign a statement (see page 10 for sample statement) that they have read and agreed to follow the policy outlined above, that they have been informed of hazardous chemicals to which their employees may be exposed, and that they have provided the Director of Maintenance and Operations with the information about any hazardous chemicals being brought onto Imperial Valley College's property.
- D. Imperial Valley College reserves the right to stop the work of a contractor if compliance with this policy is inadequate until the contractor implements all applicable safety and health procedures and the contractor is in compliance with Imperial Valley College's policy.

Note: The requirements of this section do not apply to contractors who provide temporary employees to Imperial Valley College.

VIII. Access to Written Program

Imperial Valley College meets the H.C.S. requirements for access to the Written Hazard Communication Program in the following manner:

- A. An employee may review this Written Hazard Communication Program by requesting access through their immediate supervisor, the Director of Maintenance and Operations, and/or the Director of Human Resources.
- B. All department heads, division chairs, the Maintenance Office, and the Human Resources Office will keep copies of the Written Hazard Communication Program.

IX. Hazard Determination Procedures

Imperial Valley College meets the H.C.S. requirements for written hazard determination procedures in the following manner:

- The hazard determination for all chemicals used at this campus is performed by the Maintenance & Operations Director, the Science/Laboratory Technician, and the Division Chair for the Industrial Technology Division and kept on file in the Maintenance and Operations Office.

Any questions regarding this Written Program should be directed to the Director of Maintenance and Operations. The implementation of the procedures in this program will be monitored by the Chief Business Officer to assure the effectiveness of the program.

Sample Contractor Statement

Per agreement between _____ (*Contractor*) and Imperial Valley College in which Contractor has agreed to perform certain work on Imperial Valley College property for an agreed fee or rate, Contractor acknowledges that Imperial Valley College uses and/or produces various substances, which may be classified as hazardous substances under OSHA's Hazard Communication Standard. Contractor recognizes this use of hazardous substances by Imperial Valley College and acknowledges that Imperial Valley College has provided Contractor with a description of such substances which may be present in the areas of the Imperial Valley College campus to which Contractor and its employees may have access during the performance of the job as agreed. Contractor further acknowledges that Imperial Valley College has also provided suggestions for appropriate protective measures, which should be observed when Contractor's employees are in the area of the hazardous substances.

It is the Contractor's sole responsibility to inform its employees of the described hazardous substances and protective measures suggested by Imperial Valley College. It is the Contractor's further sole responsibility to ensure that Contractor's employees observe protective measures during the performance of their duties, which are at least as stringent as the protective measures suggested by Imperial Valley College.

Contractor agrees that, in the event that it shall be required to bring any hazardous substances onto Imperial Valley College property during the performance of its job, it shall notify Imperial Valley College in advance and suggest to Imperial Valley College appropriate protective measures to be observed by Imperial Valley College employees.

Imperial Valley College specifically reserves the right to interrupt or terminate Contractor's work if Contractor should fail in whole or in part to comply with these terms and Contractor shall be prohibited from renewing such work in progress until all applicable safety and health procedures are implemented.

Agreed this _____ day of _____, _____.

Contractor

Company

(Signature)

(Signature)