



# HAZARD COMMUNICATION PROGRAM

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### 1.0 *PURPOSE*

This document serves to develop employee awareness of potentially hazardous materials within the workplace and provides guidance for working safely with these substances.

### 2.0 *APPLICABILITY AND SCOPE*

This program applies to: all USC employees; to all work conducted under the authority of the University; to all equipment; materials and property managed by the University; and to contractors in conformance with the University contract.

### 3.0 *APPLICABLE REGULATIONS AND STANDARDS*

California: Title 8, General Industry Safety Orders, Section 5194

USC Policy: USC Safety Policy # 009 Hazard Communication (<http://policies.usc.edu>)

### 4.0 *RESPONSIBILITIES*

#### 4.1 *Employee Responsibilities*

*All employees are responsible for:*

- Participating in appropriate trainings before working with hazardous materials;
- Reading and adhering to the precautions outlined on container labels, MSDSs, and departmental procedures;

## **4.2 Manager and Supervisor Responsibilities**

*Managers and supervisors are responsible for implementing this program and ensuring compliance within their department. This includes:*

- Providing EH&S with a current inventory of all hazardous materials under their jurisdiction;
- Ensuring employee access to MSDSs (hard copies or electronic files) for all hazardous substances present in their work area, during all shifts;
- Providing training to employees on the hazards associated with chemicals to which they may potentially be exposed;
- Informing EH&S and other affected personnel when introducing a material into the workplace that presents a hazard to personnel outside of the department; and
- Ensuring that all containers of hazardous materials are properly labeled.

## **4.3 Career and Protective Services Responsibilities**

*Career and Protective Services is responsible for:*

- Maintaining this written Hazard Communication Program;
- Maintaining a university-wide electronic chemical inventory;
- Assisting departments with employee training and documentation; and
- Maintaining a master file of MSDSs in the EH&S Office.

## **5.0 ACCESS TO THE WRITTEN PROGRAM**

This written Hazard Communication Program is available to all USC employees, their representatives, and contractors. Copies of this program are available from EH&S at Stonier Hall 101, (213) 740-6213. The program can also be accessed from the EH&S web site at <http://capsnet.usc.edu/EHS/Index.cfm>.

## **6.0 MATERIAL SAFETY DATA SHEETS**

MSDSs containing the hazard and precautionary information required by the Hazard Communication Standard should be kept for each hazardous substance listed on the department's "Hazardous Chemicals Inventory." The most current MSDS supplied by the chemical manufacturer or distributor should be kept on file, and made accessible to all employees, their representatives, and contractors for viewing or copying during each work shift. Paper copies of MSDSs can be maintained either in individual workspaces, or centrally within the department.

In addition, copies of the MSDSs are maintained by EH&S and can be accessed by calling (213)740-6448. The MSDSs will be maintained for at least the duration of the use of the chemical and be replaced with revisions as they are received.

MSDS information shall be provided to employees by their supervisor, on a timely basis not to exceed 30 days after receipt, if the new information indicates significantly increased risks to, or measures necessary to protect, employee health as compared to those stated on a material safety data sheet previously provided;

## **7.0 LABELS**

Original and secondary containers of hazardous substances must be properly labeled. Each supervisor will ensure that all containers have either the original manufacturer's label or a supplemental label that

includes the following:

- Product identity (trade, product, or chemical name);
- The name and address of the chemical's manufacturer;
- Appropriate hazard warnings (including health / physical hazards and target organs).

### **8.0 HAZARD RECOGNITION AND DETERMINATION**

Any substance listed in the following references (available from EH&S) is considered a health or physical hazard, and therefore, hazardous. In addition, any other substance that presents a personal hazard as determined by scientific evidence is also considered hazardous.

- Title 8, California Code of Regulations, §5155 "Airborne Contaminants";
- Threshold Limit Values for Chemical Substances in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH);
- National Toxicology Program (NTP), Sixth Annual Report on Carcinogens, 1991;
- International Agency for Research on Cancer (IARC), IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Man, Vols. 1 - 53, and Supplements 1 - 8, World Health Organization;
- 29 CFR Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration;
- The "Director's List of Hazardous Substances" (California Labor Code §6382).

Each hazardous substance present in the workplace must be listed on the department's "Chemical Inventory," and a copy of the list must be submitted to EH&S at least annually. Submit Chemical Inventory information electronically via <http://capsnet.usc.edu/LabSafety/ChemicalSafety/ChemicalInventory.cfm>. The inventory must be updated whenever a new hazardous substance is brought into the workplace.

The identity of the hazardous substance appearing on the "Hazardous Chemicals Inventory" list should be the same name that appears on the manufacturer's label and on the MSDS.

### **9.0 TRAINING AND COMMUNICATION**

Training on hazardous substances in the work area is required upon initial assignment or reassignment, and whenever a new substance is introduced into the work area. This includes training for temporary and student workers. *Contact EH&S for assistance in providing training for employees in your work area.*

Information and training shall consist of at least the following topics:

- Departmental operations where hazardous substances are present;
- Location and availability of the written hazard communication program, including the list(s) of hazardous substances and material safety data sheets;
- Methods to detect the presence of hazardous substances in the workplace (alarms, odors, etc.);
- Physical and health hazards of the substances in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures to protect employees from

exposure to hazardous substances, such as appropriate work practices, emergency procedures, and personal protective equipment to be used;

- Details of the hazard communication program developed by the employer, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information; and
- A basic description of the Hazard Communication Standard, including the requirements for container labels, MSDSs and training on hazardous substances. The training should emphasize the fact that the employees have the right to receive or have their personal physician or collective bargaining agent receive information contained in MSDSs, and that no discriminatory action may be taken against them if they exercise this right.

### **9.1 Training Records**

Training attendance records will be maintained by Career & Protective Services for the duration of the worker's employment.

### **10.0 CONTRACTORS**

Managers and supervisors are responsible for ensuring that outside contractors working in their area are provided information regarding hazards posed by USC hazardous substances. The Project Manager should review all contract work for the department so that the appropriate information can be disseminated. This includes the following information:

- Hazardous substances that contractors may encounter during their work;
- Information on obtaining MSDSs, and on the labeling systems used in the area; and
- Precautions which the employees may take to lessen the possibility of exposure.

### **11.0 HAZARDOUS MATERIAL CLEAN UP**

For clean up of a large spills contact Public Safety and request assistance from the EH&S Hazmat Team (213-740-6000).

### **12.0 PROGRAM APPROVAL AND REVIEW**

Date revised:	September 2, 2004	By: S. Hapuarachy, J. Bartlett, R. Garcia, E. Becker
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