

# ***Las Virgenes USD Hazard Communication Program***

Employers in California with employees working with chemicals are required to establish, implement, and maintain an effective written Hazard Communication (HazCom) Program that addresses hazards specific to chemicals they are, or may be exposed to. The requirements are set forth in California Code of Regulations, title 8, section 5194.

Cal/OSHA has developed this sample program to assist employers with creating their written HazCom Program. This sample program is designed to be used in conjunction with the Cal/OSHA [Hazard Communication – a Guide for Employers That Use Hazardous Chemicals](http://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf) ([www.dir.ca.gov/dosh/dosh\\_publications/hazcom.pdf](http://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf)).

To use this sample program effectively, the persons responsible for implementing an establishment's HazCom Program should carefully review all of the elements required by section 5194 and adapt this program to their specific workplace and the chemical hazards encountered.

Employers have the option of using this or any other written HazCom Program template, or modifying this template so that it effectively addresses the requirements of section 5194.



Read the [Hazard Communication standard](http://www.dir.ca.gov/title8/5194.html) online  
([www.dir.ca.gov/title8/5194.html](http://www.dir.ca.gov/title8/5194.html))

Cal/OSHA Publications Unit  
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# Hazard Communication (HazCom) Program for Las Virgenes USD

**Date: January 13, 2021**

As required by California's Hazard Communication (HazCom) Regulation (T8 CCR 5194), our company 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, Julie Pescetto, Maintenance, Operations, and Facilities Director 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

Julie Pescetto, Maintenance, Operations, and Facilities Director 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

Julie Pescetto, Maintenance, Operations, and Facilities Director 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)

Julie Pescetto, Maintenance, Operations, and Facilities Director 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. Julie Pescetto, Maintenance, Operations, and Facilities Director 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.

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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 Julie Pescetto, Maintenance, Operations, and Facilities Director. 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 this company may be exposed are kept online on the Las Virgenes website under maintenance. SDSs are readily available for review by all employees in their work area and during each work shift without the need to ask someone.

Should any of our employees work at more than one geographical location, the SDSs will be kept online on the Las Virgenes website under maintenance.

Employees are to contact Julie Pescetto, Maintenance, Operations, and Facilities Director if they have a specific question or need additional information on a SDS.

SDSs (and the older Material Safety Data Sheets) constitute an "employee exposure and medical record" and will be kept according to T8CCR section 3204 requirements. Located on the Las Virgenes website under maintenance. Labels and other forms of warning.

Before hazardous chemical containers are released to the work area, it is the policy of our company that Julie Pescetto, Maintenance, Operations, and Facilities Director 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: Manufacturer's label will be placed on the secondary container.

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.

Julie Pescetto, Maintenance, Operations, and Facilities Director will utilize the following procedures

to review and update label information when necessary:

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, Julie Pescetto, Maintenance, Operations, and Facilities Director will:

- Comply with the requirements set forth in subsections (d) through (k) of Cal/OSHA section 5194.

## **Employee information and training**

Employees are to attend a HazCom program training session set up by Maintenance Director 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 via in person and or video 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.

Training will be documented via the attached *Hazard Communication Employee Training Roster*.

## **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 the company 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.

**Non-routine tasks performed by employees in this company and the associated hazardous chemicals**

Task	Hazardous Chemical(s)
[Enter non-routine task]	[Enter hazardous chemicals listed on the SDS or the SDS identifier for the mixture]

**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."

[If applicable, list the pipes in question and the corresponding hazard controls to be implemented.]

Before employees enter the area and initiate work on or near pipes, [Type the person's name or position here] 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.

**Independent contractors and temporary employees working in our workplace**

To ensure that outside contractors work safely at our workplace and to protect our employees from chemicals used by outside contractors, [Type the name of the person, position, or department here] is responsible for arranging two-way access of the following information with respect to contractors or other employers in our workplace:

- Hazardous chemicals, including Proposition 65 chemicals, to which they may be exposed while on the job site as well as chemicals they will be bringing into the workplace. To this end, we will provide contractors with information on our labeling system and access to SDSs.
- Precautions and protective measures the employees may take to minimize the possibility of exposure.

Should we use the services of a temporary employment service, we will treat their employees as if they are ours and include them in our Hazard Communication Program accordingly.

Employees are to contact [Type name of person or position here] if they have questions about this plan or wishes to review it. Our plan will be maintained by [Type name of person or position here] to ensure that the policies are carried out and the plan is effective.

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[Signature of Owner or Top Management Representative]



## Sample Employee Hazard Communication Training Roster

Content of the training will be as outlined in our written HazCom Program and the back of this sheet.

Date: **[enter date]** Department: **[enter department name]**

Name and title of person conducting the training: **[enter name of instructor]**

- Initial training (reference attached training topic checklist)
  
- Repeat training
  
- Training on newly introduced chemical Product identifier(s): **[enter product identifier]**

Employee Name	Signature



## Sample Training Topic Checklist

- Requirements of T8 CCR section 5194.
- Operations where hazardous chemicals are present.
- Location and availability of the written Hazard Communication Program, including the list of hazardous chemicals and safety data sheets.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from exposure to hazardous chemicals.
- Details of the Hazard Communication Program, including an explanation of the labels received on shipped containers and the workplace labeling system, safety data sheets, and how employees can obtain and use the appropriate hazard information.
- Employee rights:
  - To personally receive information regarding hazardous chemicals to which they may be exposed.
  - For their physician or collective bargaining agent to receive information regarding hazardous chemicals to which the employee may be exposed.
  - 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.
- Other [enter other topics applicable to your workplace]

## Sample SDS Request Letter

Date: [enter date]

Manufacturer or Distributor: [enter name of manufacturer or distributor]

Address: [enter address of manufacturer or distributor]

RE: SDS for listed product identifiers

Product name on label	Additional identifying information

Please provide me with an up-to-date copy of your Safety Data Sheet (SDS) for the above product(s). The SDS is needed for compliance with the State of California Hazard Communication Regulation, title 8, California Code of Regulations, section 5194.

Please either send the SDS to:

[Name]  
[Company name]  
[Address]

Or email to: [Type email address here]

Please notify us in writing if this product does not require a SDS.

If you have any questions regarding our request, please contact [Type name and phone number here].

Sincerely,

Company Representative