

VENTURA COUNTY OFFICE OF EDUCATION

**ADMINISTRATIVE
REGULATION NO. 3514.1**

ADOPTED: 02/14/96

CLASSIFICATION: General Administrative Policies

REVISED: 05/06/08

SUBJECT: Hazard Communication Program

Some programs administered by the Ventura County Office of Education require that employees handle substances that are considered hazardous when used improperly. All attempts shall be made by the Ventura County Office of Education to minimize the use of hazardous substances. Substitutions of less hazardous substances shall be made whenever possible. Engineering controls shall be implemented wherever feasible.

The following program has been developed to inform employees about the hazards involved with chemicals/ substances that may be used or stored in their workplace. We believe that safety and health information should be shared openly with anyone using or working around hazardous substances. Violations of any of the following procedures by employees or managers shall be considered serious violations of safety rules and therefore subject to disciplinary action.

The Risk Manager is responsible for the implementation of this program and will monitor its effectiveness. All questions should be referred to the Ventura County Office of Education, Human Resources Department, 5189 Verdugo Way, Camarillo, CA, 93012, or by calling (805) 383-1910.

The following describes the Ventura County Office of Education's Hazard Communication Program:

1. Container Labeling

Each container of hazardous substances supplied by vendors will be labeled with the following:

- a. Contents
- b. Appropriate hazard warning(s)
- c. Name and address of the manufacturer

The Ventura County Office of Education will not accept any container with a hazardous substance if it is missing a label.

When a substance is transferred from an original container to another container (like a spray bottle), the employee who makes the transfer is required to label the new container with the following information:

- a. Contents and concentration (if diluted)
- b. Appropriate hazard warning(s)

Preprinted labels are available from Maintenance or Purchasing for the purpose of labeling secondary containers as required above. No employee shall remove or deface an original or secondary container label. Supervisors shall inspect containers during the quarterly safety inspection to ensure that labels are present, complete, and legible. It is their responsibility to ensure that containers are properly labeled.

2. Material Safety Data Sheets

Every product containing a hazardous substance must be accompanied by a Material Safety Data Sheet (MSDS) when purchased. Copies of MSDSs will be maintained in a designated book in each area where hazardous substances are used or stored. Master copies are maintained by the Risk Manager. The Purchasing Department is responsible for obtaining the MSDSs from suppliers and forwarding them to the Risk Manager. The Risk Manager shall forward copies to the department using or storing the substance.

The Risk Manager will review new and updated MSDSs for new and/or significant safety and health information, prior to releasing the substance for use by employees. If significant safety and/or health information is missing or incomplete, the Risk Manager will contact the supplier or manufacturer to request additional information. The Risk Manager will communicate any significant information to the employee using the substance, or his/her supervisor, prior to allowing the employee to handle the substance. Any substance that cannot be handled safely shall be rejected for use.

Supervisors and/or Site Administrators are responsible for insuring that MSDSs are available and accessible to their employees in their normal work areas. If MSDSs are missing or incomplete, employees are to notify their supervisor, who will obtain a copy.

3. Employee Information and Training

Before being assigned to handle hazardous substances and before new hazardous substances are introduced into the work area, employees shall participate in Hazard Communication Training. This training will be provided by the Risk Manager or a supervisor who has been trained by the Risk Manager to do the training. Hazard Communication Training includes the following:

- a. Overview of the Cal OSHA Hazard Communication Standard, including the employee rights specified by the regulation

- b. Identification of any job/operation/storage area in the work area which involves hazardous substances.
- c. Overview of the Ventura County Office of Education Hazard Communication Program including the location of the written program and Material Safety Data Sheets.
- d. How to read labels and MSDSs to obtain appropriate hazard information.
- e. The specific safety and health considerations of each hazardous substance to which the employee may be exposed.
- f. How employees can detect the presence or release of a hazardous substance in the work area, and how to protect themselves. This will include safe work practices, engineering controls and personal protective equipment.
- g. Any steps implemented or procedures to be utilized to lessen or prevent exposure, such as monitoring systems, ventilation systems, substitution of less hazardous substances, or specialized equipment for handling.
- h. Emergency and first aid procedures to follow if employees are exposed to a hazardous substances.
- i. Notification, evacuation, and/or clean up procedures to follow in the event of a spill/release of hazardous substances.

Hazard Communication Training will be provided in a classroom setting for groups of employees whenever practical. Individuals will be trained on a one to one basis when group training sessions are not scheduled or practical. Videotapes, slides, pamphlets, demonstrations, and question and answer sessions will be used to ensure that employees understand the information presented.

The Hazard Communication Training will be presented in English. If the need arises to present the training in another language, it will be arranged by the Risk Manager.

Training records will be kept of all training provided, indicating the employee's name, the trainer's name, date, and content of the training provided. The trainer's signature on the training record indicates that the employee appeared to understand the information presented and is capable of performing the job safely. To make such a determination, the trainer may opt to require the employee to complete a written or oral test.

In no circumstance will an employee be permitted to handle hazardous substances without completing the Hazard Communication Training.

4. Hazardous Non-Routine Tasks

Periodically, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their supervisor or the Risk Manager about hazards to which they may be exposed during such an activity.

This information will include:

- a. Specific hazards
- b. Safety measures which must be utilized.
- c. Measures taken by the Ventura County Office of Education to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.

5. Hazardous Substances in Unlabeled Pipes

The Ventura County Office of Education policy is to label and color code all frequently used pipes containing hazardous substances, such as those containing welding gases. The label will specify the name of the substance, potential hazard(s) and will direct employees to read the MSDS or contact their supervisor before using the substance.

Prior to starting work on unlabeled pipes, such as gas lines, employees are to contact their supervisor or the Risk Manager for the following information:

- a. The hazardous substance in the pipe.
- b. Potential hazards
- c. Safety precautions which shall be taken.

6. Informing Contractors

To ensure that outside contractors work safely while in Ventura County Office of Education facilities, the Purchasing Department will include the following information in the contract:

- a. Known hazardous substances to which they may be exposed while on the job site.
- b. Suggestions for appropriate protective measures.