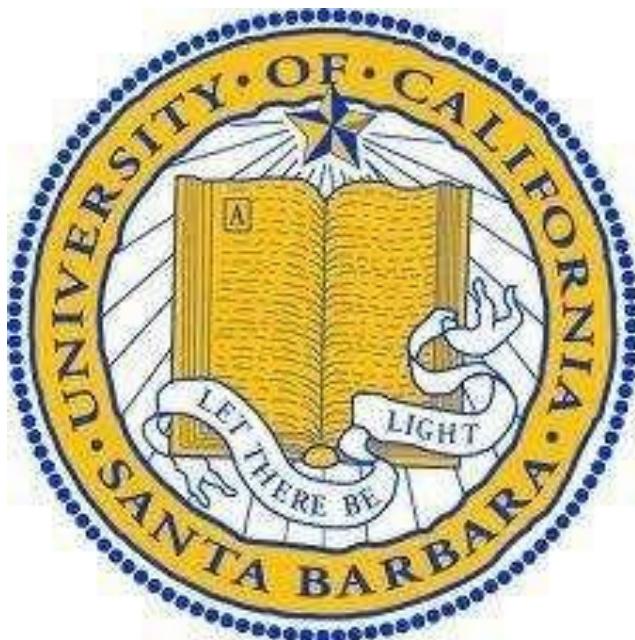


UC Santa Barbara Hazard Communication Program Manual

Rev. September 2022



Program Manager: Jesse Bickley (Interim)
Title: Industrial Hygiene Program Manager
Email: ehs-ih@ucsb.edu

Table of Contents

I. Purpose/Introduction.....	3
II. Applicability/Scope	3
A. Scope	3
B. Exceptions	4
III. Roles/Responsibilities	4
A. Deans and Department Heads	4
B. Managers, Supervisors, and Principal Investigators.....	4
C. Employees, Students, Visitors, and Volunteers.....	5
D. Non-University Employees (Contractors)	5
E. Environmental Health and Safety	6
IV. Hazard Identification, Reduction and Controls	6
A. Job Hazard Assessments (JHAs).....	6
B. Elimination, Reduction, and Substitution.....	6
C. Engineering and Administrative Controls	6
D. Personal Protective Equipment.....	7
V. Personal Protective Equipment (PPE).....	7
A. Assessments	7
B. PPE Selection	7
C. Maintenance and Replacement	7
D. Training	8
E. Additional Resources.....	8
VI. Program Requirements.....	8
A. Hazardous Substance Inventories	8
B. Safety Data Sheets (SDSs).....	9
C. Proper Labeling	9
D. Piping	10
E. Hazardous Waste	10
F. Safety Comers/Safety Bulletin Boards	10
VII. Training Requirements	11
A. Hazard Communication Training Requirements	11
B. Non-Routine Tasks	12
C. Effectiveness	12
D. Documentation	12
E. Training Resources	12
VIII. Record Keeping.....	12
A. Job Hazard Assessments (JHAs).....	12
B. Hazardous Substance Inventories	12
C. Training	12
IX. References	13
A. State Regulations.....	13
B. Federal Regulations	13
X. Issued By and Next Review Date	13
XI. Attachments	13
A. Attachment A: UCSB Chemical Inventory Form	14
B. Attachment B: UCSB Job Hazard Assessment & PPE Training Tool	15
C. Attachment C: UCSB Hazard Communication Program Policy (P-5430)	18

I. Purpose/Introduction

UCSB has developed this program to comply with Cal/OSHA regulations and help ensure the health and safety of campus employees working with or around hazardous substances. The Hazard Communication Standard (Title 8, California Code of Regulations, Section 5194) requires employers in California using hazardous substances to establish, implement and maintain a Hazard Communication Program to ensure the following:

- Documented Job Hazard and Personal Protective Equipment (PPE) Assessments are conducted for all job tasks using hazardous materials or requiring personal protective equipment;
- All hazardous substances used in the workplace are identified and properly labeled;
- Safety Data Sheets (SDSs) are readily available for all hazardous substances used or stored in a work area;
- Employees who use and/or are exposed to hazardous substances understand how to recognize and interpret labels and SDS information, and how to take appropriate safety precautions to protect themselves from exposure to hazardous substances;
- A written Hazard Communication Program is maintained and reviewed by all employees.

Each **supervisor** will bear the direct responsibility for compliance with the requirements of this program. Specific responsibilities are described in Section III of this document.

Environmental Health & Safety (EH&S) has administrative responsibility for the Hazard Communication Program. EH&S will function as a technical resource to the departments and will advise them as to the requirements of the Hazard Communication Program. Departments requiring technical assistance shall direct requests to the EH&S Hazard Communication Program Manager.

II. Applicability/Scope

A. Scope

The UCSB Hazard Communication Program, through the requirements described in this manual, establishes procedures and responsibilities for UCSB students, faculty, staff and volunteers while engaged in University-related activities. Most California worksites where employees may be exposed to hazardous substances fall under the Hazard Communication Standard, however there are some exceptions outlined below. The regulation applies to all hazardous substances used under normal conditions as well as in reasonably foreseeable emergency conditions (e.g., an accidental spill or release of a flammable chemical). Additionally, per the UCSB Hazard Communication Program Policy (P- 5430), students engaged in activities involving the use of hazardous substances shall be included under the requirements of the UCSB Hazard Communication Program.

Laboratories have a different responsibility under the Hazard Communication Program regulation, which has been superseded by the Cal/OSHA regulation on Occupational Exposure to Hazardous Chemicals in Laboratories, Title 8, Cal. Code Regs., Section 5191. The basis of the program for laboratories is the creation of a *Chemical Hygiene Plan*. Departments which maintain laboratories within their operations should contact Environmental Health & Safety Laboratory Safety Division for more information.

Hazardous substances are **defined** by the regulation as any hazardous substances listed in:

- a. The Director's List of Hazardous Substances (Title 8, Cal. Code Regs., Section 339);
- b. Toxic and Hazardous Substances List (29 CFR, Part 1910, Subpart Z)
- c. Permissible Exposure Limit for Chemical Contaminants (Title 8, Cal. Code Regs., Section 5155)
- d. Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices, American Conference of Governmental Industrial Hygienists (latest edition);

- e. National Toxicology Program, Annual Report on Carcinogens (latest edition);
- f. International Agency for Research on Cancer Monographs (latest editions);
- g. Safety Data Sheets (SDSs) as reproductive toxicants or cancer-producing substances;
- h. Chemicals Known to the State of California to Cause Cancer or Reproductive Toxicity (Proposition 65 - Title 22, Cal. Code Regs., Section 12000)
- i. And any other substances which present a personal hazard(s) as determined by scientific evidence.

B. Exceptions

The following are **excluded** from the Hazard Communication Standard:

- a. Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 when subject to regulations issued under that Act by EPA;
- b. Tobacco or tobacco products;
- c. Natural wood or chemically untreated wood products for retail sale;
- d. Manufactured items (articles that are handled/processed in a way that does not result in employee exposure via inhalation, ingestion, or skin absorption, such as items for immediate use or retail sale)
- e. Food, drugs, or cosmetics intended for personal consumption by employees while in the workplace;
- f. Retail food sale establishments and all other retail trade establishments, exclusive of processing and repair work areas;
- g. Pesticide use in compliance with the regulations of the Director of the Department of Pesticide Regulation;
- h. Consumer products, packaged for distribution to, and use by the general public, provided that employee exposure to the product is not significantly greater than consumer exposure occurring during the principal consumer use of the product.

III. Roles/Responsibilities

A. Deans and Department Heads

Deans and Department Heads are responsible for:

- Providing the necessary resources to ensure the health and safety of their employees;
- Identifying individuals as supervisors and ensuring they are trained on their health and safety responsibilities;
- Ensuring departmental compliance with campus health and safety policies and procedures;
- In consultation with Human Resources, ensure implementation of a progressive disciplinary process for repeated failure to comply with campus health and safety policies and procedures;
- Ensuring workplace hazards are identified and controlled.

B. Managers, Supervisors, and Principal Investigators

Supervisors at all levels carry the primary responsibility for ensuring the Hazard Communication Program is implemented properly within their department. Each supervisor has the direct responsibility for ensuring the following:

- Their employees understand their rights and the requirements of the UCSB Hazard Communication Program and the Cal/OSHA Hazard Communication standard;
- A current inventory of hazardous substances is available for each area they have responsibility for, and that it is updated and reposted at least annually;
- Containers of hazardous substances are properly labeled (product name, appropriate hazard

warnings, name and address of manufacturer, etc.);

- Safety Data Sheets (SDSs) are available for all hazardous substances used within areas under their supervision;
- Employees who use and/or are exposed to hazardous substances know how to interpret labels and SDS information, recognize the signs and symptoms of exposure, and how to take appropriate safety precautions to protect themselves from the hazardous substances they are exposed to;
- Documented Job Hazard and PPE Assessments are conducted for all job tasks using hazardous materials or requiring personal protective equipment to identify real and potential hazards in the areas they manage;
- Employees are provided all necessary personal protective equipment and they are trained on its proper use.
- Provide additional training to employees who are found to not comply with campus health and safety policies and procedures and implement progressive discipline for repeat non-compliance.

C. Employees, Students, Visitors, and Volunteers

Employees, Students, Visitors, and Volunteers are responsible for:

- Understanding and complying with campus health and safety policies and procedures;
- Notifying their supervisor or EH&S about any hazardous conditions observed on the worksite;
- Reviewing SDSs to become familiar with the hazardous substances used in their area;
- Utilizing all appropriate safety equipment and clothing properly and routinely.

D. Non-University Employees (Contractors)

This section outlines the University Representative's and Contractor's responsibilities when campus personnel or a contractor's employees may be exposed to hazardous substances during a project.

University Responsibilities

In order to ensure the health and safety of outside vendors it is the responsibility of the Project Manager or other university representative to provide contracts with the following:

- A list of campus hazardous substances they may encounter or be exposed to while performing their work;
- The location of SDSs for campus hazardous substances that contractors may encounter;
- Information regarding the precautions and appropriate protective measures workers should take to reduce their risk of exposure to campus hazardous substances;
- Details about the labeling system used for hazardous substances as required.

Contractor Responsibilities

To protect University employees from potential hazards created by outside vendors, each contractor must provide the Project Manager or other university representative with the following information:

- A list of hazardous substances which will be used on the job;
- The location of SDSs for products used by the contractor within University facilities;
- Precautions and appropriate measures campus employees should take to reduce the possibility of exposure to these substances;
- Details about the labeling system and posting used for hazardous substances as required;
- Information required in the UCSB Building Design Standards, Division 1, Section 013513.43 - Control of Airborne Contaminates where applicable.

These shall be presented by the contractor to the Project Manager or other university representative overseeing the project prior to commencing work. It is the responsibility of the Project Manager to ensure this information is disseminated to supervisors and employees of areas that may be impacted by the

E. Environmental Health & Safety (EH&S)

The UCSB Hazard Communication Program is administered by EH&S. EH&S will function as a technical resource to departments and will assist them in carrying out their responsibilities as necessary. Specifically, EH&S is responsible for:

- Developing and maintaining the UCSB Hazard Communication Program, and ensuring it meets all applicable regulatory requirements;
- Developing and providing Hazard Communication Program training;
- When requested, assist supervisors, managers, and Principal Investigators in the development of job hazard and PPE assessments
- Assessing the effectiveness of the program as described in this document.

IV. Hazard Identification, Reduction and Controls

A. Job Hazard Assessments (JHAs)

A documented Job Hazard Assessment must be conducted for all job tasks using hazardous materials or requiring the use of personal protective equipment. The hazard analysis should encompass the entire process and identify both real and potential hazards. The evaluation should focus on eliminating or reducing hazards through the use of product substitution, and engineering and administrative controls. To assist supervisors with this task EH&S has created the UCSB Job Hazard Assessment & PPE Selection Tool (Appendix B) and if needed, EH&S will provide additional hazard assessment training and assistance upon request. Additional information on completing a hazard analysis can be found at: <http://www.osha.gov/Publications/osha3071.pdf>.

B. Elimination, Reduction, and Substitution

Minimize or avoid the use of hazardous substances whenever possible. It is the responsibility of the supervisor to determine if the use of hazardous substances is necessary, and assess whether a less hazardous or non-hazardous substitute exists. Hazardous substances should be eliminated and/or substituted for less hazardous substances whenever possible. For instance, some industries have eliminated their use of organic solvents and returned to using soap and water for some processes. Each process must be evaluated to determine if it is feasible to reduce or eliminate hazards.

Reduce risk by reducing inventory. It is the responsibility of supervisors to ensure all use, storage, handling, and disposal of hazardous substances is done appropriately. Having fewer hazardous substances on hand lowers both risk and administrative costs. Cost savings achieved through bulk purchases are often negated by the costs associated with storing hazardous substances properly and disposal of outdated products.

C. Engineering and Administrative Controls

When hazards cannot be completely eliminated or reduced below acceptable exposure limits, engineering controls shall be implemented to eliminate or reduce the risk of exposure for employees. The best time to introduce engineering controls is when a facility or process is in the design phase. An example of engineering controls would be the use of ventilation to capture and remove contaminants before they enter a worker's breathing zone. Another example would be the installation of a safety guard on a machine that poses a hazard to employees.

Engineering controls are to be used as the first line of defense against workplace hazards. However, there are some circumstances when administrative controls may be used, such as when engineering controls are not feasible, or during the installation of engineering controls. Examples of administrative controls are

work period reduction, job rotation, appropriate work practices, proper maintenance, and personal hygiene.

D. Personal Protective Equipment

Personal protective equipment is the last line of defense against workplace hazards and should only be considered after it has been determined that engineering and administrative controls are not feasible, while they are being installed, in the event of an emergency, or if they are not sufficient to achieve acceptable levels of exposure. Please see Section V for additional PPE selection, maintenance and training requirements.

V. Personal Protective Equipment (PPE)

This section was developed to meet the requirements of the UCOP Personal Protective Equipment Policy and Cal/OSHA Personal Protective Devices Standard (Title 8, Cal. Code Regs., Section 3380). Personal protective equipment is the last line of defense against workplace hazards and should only be considered if engineering and administrative controls are not feasible, while they are being installed, or if they are not sufficient to achieve acceptable levels of exposure. Supervisors are responsible for assessing the need for PPE, training their employees on its proper use, ensuring PPE is maintained in a safe, sanitary condition, and is used in accordance with the manufacturer's instructions.

A. Assessments

Each supervisor shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of PPE. Each supervisor shall verify that the required workplace Job Hazard Assessments (JHAs) have been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment. The job hazard assessment should be repeated when new hazards are identified, or introduced into the workplace, or at least every three (3) years. See Appendix B for the UCSB Job Hazard Assessment and PPE Selection Tool.

B. PPE Selection

If workplace hazards cannot be eliminated, or controlled through engineering or administrative means supervisors shall:

- 1) Select and ensure the use of PPE that will protect employees from the hazards identified in the Job Hazard Assessment;
- 2) Communicate selection decisions to each affected employee; and,
- 3) Select PPE that properly fits each affected employee.

PPE shall be of such design, fit and durability as to provide adequate protection against the hazards for which they are selected. PPE should be reasonably comfortable and shall not unduly encumber the employee's movements necessary to perform their work or create a hazard by being caught in equipment or objects. Supervisors shall ensure that all personal protective equipment, whether employer-provided or employee-provided, complies with the applicable Title 8 standards for the equipment. Each supervisor is responsible for periodically re-evaluating the selection and use of PPE in work areas under their control.

C. Maintenance and Replacement

Employees are responsible for properly wearing required PPE and informing their supervisor when worn or damaged PPE needs to be replaced. Defective or damaged personal protective equipment shall not be used.

D. Training

Supervisors must provide documented training to all employees required to use PPE. Employees shall be instructed on its use in accordance with the manufacturer's instructions. Each affected employee shall demonstrate the ability to use PPE properly and an understanding of the items listed below prior to being allowed to perform work requiring the use of PPE:

- 1) When PPE is necessary;
- 2) What PPE is necessary;
- 3) How to properly don, doff, adjust, and wear PPE;
- 4) The limitations of the PPE; and,
- 5) The proper care, maintenance, useful life and disposal of the PPE.

When the supervisor has reason to believe that any affected employee who has already been trained does not have the understanding and skill required above, the supervisor shall retrain each such employee. Circumstances where retraining is required include, but are not limited to, situations where:

- 1) Changes in the workplace render previous training obsolete; or
- 2) Changes in the types of PPE to be used render previous training obsolete; or
- 3) Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

The employer shall verify that each affected employee has received and understood the required training through a written certification that contains the name of each employee trained, the date(s) of training, and that identifies the subject of the certification.

E. Additional Resources

[Cal/OSHA Personal Protective Devices Standard \(CCR, Title 8, Section 3380\)](#)

[Cal/OSHA Personal Protective Equipment & Job Hazard Assessment Guide](#)

[UC Systemwide Personal Protective Equipment Policy](#)

[Federal OSHA PPE & Assessment Guide](#)

VI. Program Requirements

It is the responsibility of manufacturers, distributors and importers to assess the physical and health hazards associated with the substances they produce or repackage and to make such information available to consumers by means of proper labeling and Safety Data Sheets (SDSs). It is then the employer's responsibility to provide this information to their employees and ensure that they understand how to work with hazardous substances safely prior to using them. This is accomplished by having knowledge of all hazardous substances onsite, performing Job Hazard Assessments (JHAs) to identify real and potential hazards to employees, ensuring SDSs and other safety information is available to and has been reviewed by employees, and training employees on the dangers associated with working with the hazardous substances they may be exposed to. It is the responsibility of each supervisor to ensure that their employees recognize and understand the hazards in their workplace by ensuring the following:

A. Hazardous Substance Inventories

A complete, accurate and up-to-date inventory of hazardous substances used and/or stored in the workplace is a required element of the hazard communication program. Where possible, elimination of hazardous substances is to be promoted at every opportunity by those conducting the inventory. It is necessary to ensure any hazardous waste generated by reducing inventories is handled correctly. Departments should contact the EH&S Campus Hazardous Waste Program for hazardous substance and hazardous material disposal information.

Continuous Inventory

It is essential that departments establish procedures for acquiring SDSs for new hazardous substances and training employee(s) on the hazards of such materials prior to their use. For this purpose, supervisors are responsible for maintaining an up-to-date inventory of all hazardous substances on-site, and ensuring all necessary training is conducted.

Annual Inventory

Supervisors are also responsible for ensuring a comprehensive inventory is completed at least annually for each worksite under their supervision. Annual inventories should focus on the elimination of hazardous substances no longer needed or used. It is also a good time to ensure job hazard assessments have been performed for all new products used.

The procedure for completing hazardous substance inventories shall be as follows:

1. Site personnel evaluate all hazardous substances and segregate materials no longer needed by the department due to change in need, substitution of products, expired shelf life, etc. (EH&S will provide assistance for departments conducting annual inventories as needed).
2. Department arranges for proper hazardous waste disposal in conjunction with EH&S.
3. Supervisors and/or employees update the inventory for each worksite, listing or deleting new or outdated materials where applicable.
4. Supervisor ensures all worksites have an updated inventory and obtains a copy of each inventory for their records.
5. Supervisor spot checks sites for quality control purposes.

B. Safety Data Sheets (SDSs)

SDSs provide information on product health hazards, special chemical and physical characteristics, emergency procedures, recommended protective measures, and precautions for safe handling, use and storage of each chemical. Supervisors shall ensure current Safety Data Sheets (SDSs) are readily available for every hazardous substance used or stored within their area. This can be achieved by keeping hard copies of the SDSs onsite or by having electronic copies of SDSs stored on computers that are readily accessible to employees. For new products, supervisors must ensure SDSs are obtained and reviewed prior to use.

SDSs can be accessed online at: <https://www.ehs.ucsb.edu/programs-services/lab-safety-chemical-hygiene/safety-data-sheets>

C. Proper Labeling

Hazardous substances used or stored in the workplace must be properly labeled. Hazardous substances in their original packaging are usually labeled correctly by the manufacturer; however, some hazardous substances are repackaged by distributors and are less subject to regulatory scrutiny. It is advisable that supervisors review product labels before allowing their use.

Hazardous substances which are dispensed into secondary containers for use shall meet the following labeling requirements:

- Labels or other forms of hazard warnings must be legible, in English, and prominently displayed on the chemical container or area of use;
- Labels must clearly state the hazardous substance contained therein;
- Labels must contain appropriate hazard warnings for the substance.

Hazardous substances which are not labeled according to these criteria shall be not be used. It is the

supervisor's responsibility to assure proper labeling and removal of any unlabeled materials from the work area.

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.

Whenever available, commercially prepared labels shall be used for secondary containers. The Hazard Communication Program Manager should be contacted for more information on proper labeling if there is any uncertainty.

D. Piping

All piping used for hazardous substances shall be labeled with the same information required for chemical containers (see Proper Labeling in Section V.C). Supervisors are responsible for ensuring that piping containing hazardous substances is identified and labeled in their areas. All potential work locations should be surveyed to identify piping that requires labeling.

Only authorized employees shall be allowed to work on unlabeled pipes. To ensure that these employees have been informed as to the hazardous substances contained within, the following policy has been established:

Prior to the start of work on unlabeled pipes, employees are to contact their supervisor for the following information:

- Substance(s) **in** the pipe;
- Potential hazards;
- Safety precautions which shall be necessary.

E. Hazardous Waste

Supervisors are responsible for ensuring proper handling, storage and disposal of hazardous waste. The EH&S Hazardous Waste Program provides cost-effective hazardous waste management in compliance with federal, state, and local regulations. The program also provides services for chemical pickups, emergency spill response, and assistance with shipping hazardous materials. More information about hazardous waste and hazardous waste disposal can be found at the websites below:

[EHS Hazardous Waste Program Website](#)

[UCSB Hazardous Materials/Waste Pickup Request](#)

[UCSB Chemical Hazardous Waste Disposal Procedures](#)

[UCSB Laboratory Clean-Out Procedures](#)

F. Safety Corners/Safety Bulletin Boards

Safety corners or safety bulletin boards are to be established for each worksite by the supervisor. The purpose of a safety corner is to make health and safety information readily available to all employees. Safety corners should be posted in convenient, accessible locations, and at a minimum contain the following:

- List of chemical hazards in workplace (chemical inventory);
- SDSs for the work area;
- Emergency Notification Numbers (red/white placard);
- Cal/OSHA poster "Safety and Health Protection on the Job";
- Employee Access to Medical and Exposure Record Poster (Title 8, Cal. Code Regs., section 3204)
- Hazard Reporting forms (Appendix I of injury and Illness Prevention Plan);
- Pertinent environmental health and safety notifications, posters, information, etc.

The following material should be available to all employees in a close location:

- Records of employee training and workplace inspections;
- Relevant health and safety information such as written manuals and SOPs.

VII. Training Requirements

Supervisors have the primary responsibility for ensuring the health and safety of their employees. A major component of this responsibility is ensuring employees receive documented comprehensive safety training. A list of required training should be developed by supervisors for each employee or groups of employees with similar job duties. Training should provide practical and specific information about workplace hazards and safe work practices. EHS offers a variety of training courses including general Hazard Communication and SDS training on the UCSB Learning Center; however, these courses are not a substitute for in-person on the job training.

Please see the UCSB Training Resources section below for more information on the various training courses available to supervisors and employees at UCSB.

A. Hazard Communication Training Requirements

Employee training is the most critical part of the hazard communication program. All UCSB employees, career and general assistance, full-time and part-time, must be fully trained in all aspects of this program relative to their job assignment. Employees must understand the potential hazards in their work area and have the knowledge of how to reduce or eliminate those hazards prior to commencing work.

Training shall be provided:

1. At the time of initial assignment;
2. When a new hazardous substance is introduced into the workplace;
3. When a previously unidentified hazard is discovered in the workplace;
4. When a Lessons Learned has been developed to address similar type operations in the workplace
5. When new tasks are assigned.

Supervisors shall ensure their employee are trained on and understand the following:

- Requirements of the Hazard Communication regulation, including employee rights under the standard, such as the right of an employee to receive SDSs on workplace substances, and access to medical and exposure records;
- Identification of locations and operations where hazardous substances are used or stored in their work area;
- The physical and health hazards of the substances used or stored;
- Training on SDSs and proper labeling, including detail and guidance on interpreting hazard information and technical terms;
- A description of the location and availability of SDSs, the written departmental Hazard Communication program, and the chemical inventory for each worksite (e.g., the departmental Safety Corner);
- Methods and observations that can be used to detect the presence of hazardous substances, such as instrumentation, workplace monitoring, odor, appearance;
- Protective measures for minimizing exposure to the hazard, such as work practices, personal protective equipment, and emergency procedures;
- Specific hazard information which covers the non-routine work assignments which are periodically performed by employees;

B. Non-Routine Tasks

Employees may periodically perform tasks which may expose them to hazardous substances not typically used in their normal work activities. Examples of non-routine tasks performed by campus personnel include: responding to emergency situations (e.g., repairs, spill cleanup), servicing equipment and annual maintenance. Prior to starting work on such projects, affected employees shall be given training about the hazards of the task and how to protect themselves. Training may be delivered verbally or via written handouts as long as it is documented.

Training must include the same level of detail and information necessary for routinely used hazardous substances. Training should emphasize that the potential hazards of working with unfamiliar substances or in unfamiliar conditions can be greater than those routinely encountered. It is important to understand that the frequency of an assignment does not excuse or change the type, scope and detail of training required.

C. Effectiveness

Under Cal/OSHA regulations, mere attendance at a training session does not meet legal training requirements. Employees must understand the material that is presented. In order to verify that an employee understands the material and that the training was effective, employee competence should be tested and documented through a written quiz or by other equally effective means. Training shall be repeated as often as necessary to ensure employee competency and understanding.

D. Documentation

In order to comply with Cal/OSHA standards, all employee training shall be documented. Documenting employee training can be done on the UC Learning Center or by using an Employee Training Checklist. At a minimum, documentation should include the employee's name, employee ID number, the date the training is completed, the topics covered in the training and the employee's and supervisor's signatures. See the links below for more information on training documentation and checklists.

E. Training Resources

[UCSB Learning Center](#)

[EH&S Training Website](#)

[Training Checklist for Skilled Labor, Shops and Trades](#)

[Training Checklist for Offices](#)

VIII. Record Keeping**A. Job Hazard Assessments (JHAs)**

Departments shall retain Job Hazard Assessments for the duration that a process is active.

B. Hazardous Substance Inventories

Departments shall maintain an up-to-date Hazardous Substance Inventory onsite for all areas where hazardous substances are used or stored for as long as the materials are present.

C. Training

Departments shall retain training records for at least ten years after the person has retired or left University employment. Training completed/recorded on the Learning Management System (LMS) is kept indefinitely.

IX. References

A. State Regulations:

[Cal/OSHA Hazard Communication Standard](#)

[Cal/OSHA Personal Protective Equipment \(PPE\) Regulation](#)

B. Federal Regulations:

[Federal Hazard Communication Standard](#)

X. Issued By and Next Review Date

Issued by: Jesse Bickley, Industrial Hygiene Program Manager

Date: September 1, 2022

Review Date: Every 5 years unless required sooner by regulatory update or deficiencies noted.

XI. Attachments

Attachment A: UCSB Chemical Inventory Form

Attachment B: UCSB Job Hazard Assessment & PPE Selection and Training Tool

Attachment C: UCSB Hazard Communication Program Policy (P-5430)

Appendix A

Area Supervisor _____

Inventory Date: _____

Person Completing Inventory _____

Building: _____

Department _____

Room: _____

INSTRUCTIONS: An up to date inventory of hazardous substances shall be kept for each location where hazardous substances are used or stored.

UCSB Job Hazard Assessment & Personal Protective Equipment Selection and Training Tool

Evaluation

NAME OF INDIVIDUAL PERFORMING EVALUATION:	DATE OF EVALUATION
EVALUATION FOR (individual, Job, Process):	
CERTIFICATION. By signing this form, the individual certifies that a workplace hazard assessment has been performed in accordance with 8 CCR§ 3380.	

Job Hazard Assessment

Instructions: 1) Use this form to perform a documented job hazard assessment for **each job task** that necessitates the use of personal protective equipment (PPE), 2) Provide training and document on the (attached) training roster, and 3) Maintain this documentation until the task is no longer being performed. Example of hazards include: Impact, penetration, compression, laceration, exposure, heat, noise and light (optical) radiation. Note that these Personal Protective Equipment (PPE) controls should be used in conjunction with other controls (engineering, administrative, and work practices).

Job Task		PPE
		<input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:
		<input type="checkbox"/> EYE/FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:
		<input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:
		<input type="checkbox"/> EYE/ FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:
		<input type="checkbox"/> EYE/ FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:
		<input type="checkbox"/> EYE/ FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:

PPE Training Roster

Class:	Personal Protective Equipment (PPE)
Date/Time:	_____
Location:	_____
Instructor:	Job Title: _____
Topics:	When PPE is necessary; What PPE is necessary; How to properly don, doff, adjust, and wear PPE; Limitations of PPE; Proper care, maintenance, useful life, and disposal of PPE; Demonstration of ability to use PPE. [8 CCR 3380]

Instructions:

1. Complete this form for **each** personnel member.
2. Submit this form to EH&S Training by campus mail, fax (805) 893-8659 or email nick.nieberding@ehs.ucsb.edu.

***Identification:** Enter your Student ID, Employee ID, UC NetID, UC Email, or Date of Birth.

****Student Signature:** By signing this document I acknowledge that I received and understood the training above.

*****Instructor Initial:** By my initials I certify that the individuals on this roster have successfully passed the course (assessment).

UCSB Job Hazard Assessment & Personal Protective Equipment Selection and Training Tool (sample)

Evaluation

NAME OF INDIVIDUAL PERFORMING EVALUATION <i>Joe Supervisor</i>	DATE OF EVALUATION <i>05/06/2011</i>
EVALUATION OF (<i>Individual, Job, Process</i>) <i>General Research Assistant</i>	
CERTIFICATION. By signing this form, the individual certifies that a workplace job hazard assessment has been performed in accordance with 8 CCR§ 3380.	
SIGNATURE <i>J. Supervisor</i>	

Job Hazard Assessment

Instructions: 1) Use this form to perform a documented job hazard assessment for **each job task** that necessitates the use of personal protective equipment (PPE), 2) Provide training and document on the (attached) training roster, and 3) Maintain this documentation until the task is no longer being performed. Example of hazards included: Impact, penetration, compression, laceration, exposure, heat, noise and light (optical) radiation. Note that these Personal Protective Equipment (PPE) controls should be used in conjunction with other controls (engineering, administrative, and work practices).

<i>Research using organolithium compounds</i>	<i>Chemical (flammability and corrosivity)</i>	<input checked="" type="checkbox"/> EYE / FACE: <i>Safety glasses and face shield</i> <input checked="" type="checkbox"/> BODY: <i>Flame-resistant laboratory coat or coveralls</i> <input checked="" type="checkbox"/> HAND: <i>Nitrite gloves</i> <input checked="" type="checkbox"/> FOOT: <i>Closed-toe shoes</i> <input type="checkbox"/> OTHER:
<i>Operation of Class 3B laser</i>	<i>Heat and Light (optical) radiation (Burns to eyes and/or skin)</i>	<input checked="" type="checkbox"/> Eye /Face: <i>Laser safety glasses/goggles with OD 5</i> <input checked="" type="checkbox"/> BODY: <i>Long-sleeved shirts and pants made of natural fibers</i> <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input checked="" type="checkbox"/> OTHER: <i>Hearing protection</i>
		<input checked="" type="checkbox"/> EYE / FACE: <i>Safety glasses</i> <input checked="" type="checkbox"/> BODY: <i>Laboratory coat</i> <input checked="" type="checkbox"/> HAND: <i>Gloves</i> <input checked="" type="checkbox"/> FOOT: <i>Closed-toe shoes</i> <input type="checkbox"/> OTHER:
<i>Disposal of biohazardous waste</i>	<i>Chemical (bloodborne pathogens)</i>	<input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER: <input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER: <input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:
		<input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER: <input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER: <input type="checkbox"/> EYE / FACE: <input type="checkbox"/> BODY: <input type="checkbox"/> HAND: <input type="checkbox"/> FOOT: <input type="checkbox"/> OTHER:

Appendix C

UCSB Hazard Communication Program Policy (P-5430)

UC Santa Barbara
Policies
Issuing Unit: Administrative Services

Policy 5430
Date: June 1, 1987

UCSB'S HAZARD COMMUNICATION PROGRAM

I. REFERENCES:

- A. Title 8, California Code of Regulations, General Industry Safety Order 5194.
- B. UCSB Hazard Communication Program (HCP), available in the Office Of Environmental Health and Safety.

II. POLICY:

It is the policy of the University of California, Santa Barbara, to maintain insofar as it is reasonably within the control of the University to do so, an environment that will not adversely affect the health, safety, and well-being of students, employees, visitors, and neighboring populations.

- A. To identify and mitigate the potential hazards associated with **exposure to hazardous substances**, the **Hazard Communication Program defines protocol, procedures, training and recordkeeping requirements**.
- B. **All activities involving the use of hazardous substances**, in facilities controlled by or operating under the auspices of the University of California, Santa Barbara, shall be conducted in compliance with Title 8 of the California Administrative Code, General Industry Safety Order 5191, and with the provisions of the UCSB HCP.
- C. This policy specifically extends coverage as defined by the HCP to all University of California students engaged in activities involving the use of hazardous substances.
- D. The HCP establishes the procedures and requirements necessary to meet Cal-OSHA's regulations and University policy for use of hazardous substances and to provide the necessary health and safety protection to those persons falling within the jurisdiction of the program.
- E. Department chairpersons, unit managers and/or principal investigators and line supervisors are responsible and accountable for assuring departmental compliance with the HCP stipulations.
- F. The Environmental Health and Safety Office will assure University compliance with the HCP, and provide technical assistance to departments in their administration of this program.