



IMPERIAL COUNTY  
**Behavioral Health Services**  
MENTAL HEALTH & SUBSTANCE USE RECOVERY

2024

# HAZARDOUS COMMUNICATION



Prepared By:

OSHA Disaster Response Committee

# OSHA DISASTER RESPONSE COMMITTEE MEMBERS

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## **INTRODUCTION**

In November 1986, the voters of California passed Proposition 65 – Title 27 of the California Code of Regulations, Section 25000 to 27001 inclusive. This law became effective on January 1, 1987. It requires the Governor of California to publish a list of chemicals “...known to the State to cause cancer or reproductive toxicity...” according to a specified procedure established by the Proposition. This list was first published on February 27, 1987 covering 29 chemicals. The list has been revised since then to include 800 chemicals, and other revisions will be forthcoming. A copy of the list is included in the County IIPP and can also be obtained from the California Department of Health Services.

Proposition 65 requires that a clear and reasonable warning to be given to persons potentially exposed to listed chemicals at the levels specified by the regulations adopted by the California Health and Welfare Agency (CHWA).

The County of Imperial operates under numerous health, safety, and environmental laws which protect employees and public health. Many of these laws already require work place warnings regarding potential health hazards from certain chemicals. In conformance with regulations, adopted by CHWA on February 16, 1988, the following warning is provided to persons potentially exposed to chemicals:

### WARNING

The County of Imperial uses chemicals known to the State of California to cause cancer, birth defects, and other reproductive harm. Unauthorized use is prohibited. Authorized personnel using these chemicals should refer to the applicable Material Safety Data Sheet (MSDS) and follow appropriate safety procedures.

Imperial County Behavioral Health Services has created a Hazard Communication Plan which is intended to supplement the County’s Injury and Illness Prevention Program in accordance with the OSHA Hazard Communications Standard, 29 CFR 1910.1200. The purpose of this plan is to inform employees of hazardous substances to which employees may be exposed while performing their work and to provide suggestions for appropriate protective measures. ICBHS has an inventory of hazardous chemicals used at the different ICBHS Programs and an inventory of Material Safety Data Sheets (MSDS) to inform employees of those chemicals. Additionally, ICBHS provides training to all employees on how to prevent or avoid exposure to the hazardous chemicals.

## **RESPONSIBILITIES**

The ICBHS OSHA Compliance Coordinator, or designee designated by the ICBHS Director, is responsible for the implementation, coordination and maintenance of the Hazardous Communication Plan. The ICBHS OSHA Compliance Coordinator will review and update the plan as necessary.

The ICBHS OSHA Compliance Coordinator shall have the primary authority role in advising and assisting managers and supervisors in executing their safety responsibilities. The OSHA Compliance Coordinator designee/alternative has the role in assisting with advising and assisting managers and supervisors.

OSHA Compliance Coordinator

**Sarah Moore**

Behavioral Health Manager

Managed Care, Manager

Disaster Coordinator

**Adolfo Estrada**

Behavioral Health Manager

Supervisors are responsible for ensuring employees are trained on new chemicals used in their departments.

Employees are responsible for following the provisions of this program and related policies and procedures including:

- Reading labels on any chemicals used and determining what procedure applies and personal protective equipment is required
- Obtaining and wearing necessary personal protective equipment when working with hazardous chemicals
- Informing supervisors of spills or leaks that may cause exposure to hazardous chemicals

## **HAZARDOUS DETERMINATION**

Chemical manufacturers and importers determine the hazards of each product they produce. Chemical manufacturers, importers, and distributors communicate the hazard information and

associated protective measures downstream to customers through labels and Material Safety Data Sheets (MSDS). The ICBHS OSHA Compliance Coordinator or designee identifies and lists hazardous chemicals used in the department; obtains MSDS and labels for each hazardous chemical, if not provided by the manufacturer, importer, or distributor; ensures that the written hazardous communication program includes information on labels, MSDSs, and employee training on the list of chemicals, MSDSs, and label information; and, communicates hazard information to employees through labels, MSDSs, and training.

## **LIST OF HAZARDOUS CHEMICALS**

The ICBHS OSHA Compliance Coordinator, or designee, will maintain a master list of all hazardous chemicals used in this department, and will update the list as necessary. The hazardous chemicals used in all departmental work areas will be documented on the Hazardous Substance Inventory Control (00-117). Each hazardous chemical on the list must be cross-referenced to an appropriate MSDS. The master list of these chemicals is available from the ICBHS OSHA Compliance Coordinator, or designee. Partial lists will be maintained at each work site where hazardous chemicals are used.

## **MATERIAL SAFETY DATA SHEETS (MSDSs)**

The Hazardous Communication Standard requires that MSDSs be available to all employees for each hazardous chemical identified and used. MSDSs provide specific information about chemicals such as their chemical identities, physical properties, associated health hazards, control measures, and precautions for safe handling and use.

The ICBHS OSHA Compliance Coordinator is responsible for maintaining and updating a binder with a MSDS on every substance on the master list of hazardous chemicals. The MSDS will be a fully completed OSHA Form 174, or equivalent. MSDSs will be made readily accessible to employees at their work sites.

The program manager/supervisor will maintain an MSDS for all chemical containers labeled as a hazard that are received at a work site. If a manager or supervisor introduces a hazardous material to the work site he or she is responsible for acquiring and submitting a copy of the MSDS to the ICBHS OSHA Coordinator, or designee. If a product is no longer being used at a specific location, the ICBHS OSHA Coordinator or designee should be notified. In this case, the MSDS may be removed from the specific work site. The MSDS will be kept on file by the ICBHS OSHA Coordinator or designee for 30 additional years.

If the hazardous substance was ordered through the ICBHS Purchasing Unit, the Purchasing Unit supervisor will contact the chemical manufacturer or vendor if an MSDS has not been supplied with an initial shipment. The ICBHS OSHA Compliance Coordinator must be notified of all new procurements.

The master list of MSDSs is available from the ICBHS OSHA Compliance Coordinator, or designee.

## **LABELS AND OTHER FORMS OF WARNING**

The ICBHS OSHA Compliance Coordinator, or designee, will ensure that all hazardous chemicals in the workplace are properly labeled and updated, as necessary. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party.

Existing labels on incoming containers shall not be removed or defaced unless the container is immediately marked with the required information.

All containers of hazardous chemicals in the workplace must be labeled, tagged, or marked with the identity of the hazardous chemical contained therein and appropriate hazard warnings for employee protection. The hazard warning may include words, pictures, symbols, or a combination thereof, which provide at least general information regarding the hazards of the chemical(s) and which, in conjunction with other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical. Labels will be legible, in English (and other languages, if applicable), and the warning will be prominently displayed on the container.

**For secondary containers**, it is the responsibility of the supervisor in each section to ensure labeling of containers when chemicals are placed in containers other than in which they were brought into the facility. Secondary containers will be labeled with the identity of the hazardous chemical, appropriate hazards and warnings and the name and address of the chemical manufacturer.

## **NON-ROUTINE TASKS**

When employees are required to perform hazardous non-routine tasks, a special training session will be conducted to inform them regarding the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure.

## **TRAINING**

Employees who work with, or are potentially exposed to hazardous chemicals, will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals. The ICBHS OSHA Compliance Coordinator, or designee, will provide this training.

The training plan will emphasize these items:

- Summary of the standard and this written program
- Chemical and physical properties of hazardous materials, including visual appearance, odor, and methods that can be used to detect the presence or release of hazardous chemicals
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)

- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical
- Procedures to protect against hazards including:
  - personal protective equipment required
  - proper use, and maintenance of personal protective equipment
  - work practices or methods to assure proper use and handling of chemicals
  - emergency response procedures
  - work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks
- Location of MSDSs, interpretation of their contents and labeling information, as well as instructions for employees in how to obtain and use appropriate hazard information
- Explanation of the labeling system and instructions for preparing secondary container labels

Training shall be documented and safety training records are to be maintained by the ICBHS Staff Development Unit. Written documentation of safety and health training must include:

- Date (and time) of the training
- Contents or a summary of the training session
- Name and qualification of person(s) conducting the training
- Names and job titles of all persons attending the training sessions

Training records shall be maintained for at least one (1) year. ICBHS shall ensure that all records required to be maintained by this section shall be made available upon request to the appropriate regulatory agency.

Whenever a new hazard is introduced into any program/unit of the department, each employee in that program/unit will be given information for the new chemical hazard.

Supervisors will be trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices.

The ICBHS OSHA Compliance Coordinator will review our employee training program and advise the program manager on training and retraining needs when the hazard changes or when a new hazard is introduced into the workplace. Regular safety meetings will be used to review the information presented in the initial training. In addition, as part of the assessment of training program, the Staff Development Unit will obtain input from employees regarding the training they have received, and their suggestions for improving it.

## **OTHER CONTRACTORS/EMPLOYERS**

The ICBHS OSHA Compliance Coordinator will advise outside contractors of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling

system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition, the ICBHS OSHA Compliance Coordinator will notify these individuals of the location and availability of MSDSs.

Each contractor/employer bringing chemicals on-site must provide ICBHS with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.