



# 2020 HAZARD COMMUNICATION PROGRAM

Objective	Provide comprehensive and compliant TBCC Hazard Communication Program
Intended Audience	Bay Club Leaders
Required Documents	<ol style="list-style-type: none"> <li>1. Hazard Communication Program Training Guidelines</li> <li>2. Hazard Communication Program Training Participation Form</li> <li>3. Attendance Log</li> </ol>

## PROGRAM GOALS:

- Reduce to eliminate injuries caused by chemicals.
- Increase awareness in everyday activities, tasks and situations that require the use, storing, handling and disposing of chemical products. Modify tasks, work positions or protocols as necessary to protect Associates.
- Increase morale, productivity and quality
- Comply with [California Code of Regulations, Title 8 section 5194](#), Hazard Communication

## BAY CLUB LEADERSHIP RESPONSIBILITIES:

1. Read this program entirely before training or allowing someone to train front-line Associates. Trainers must use any and all material in Additional Resources to secure good knowledge of this program.
2. Implement the requirements of this program
3. Document Training: new associates upon hire - existing associates, yearly and as needed. Use “Hazard Communication Program Training Guidelines” for training and where to store documents.
4. Communicate with associates effectively so that they are more aware of hazards. Encourage them to follow safety rules.
  - a. Use disciplinary actions (written warnings) when TBCC associates do not comply. Report failure to comply immediately
  - b. Club Level: Report to Club General Manager and/or HR as necessary regarding any safety concerns
  - c. Company Level: Report to HR any issues related to training OR implementation of this Program, including disciplinary and corrective actions

## INTRODUCTION – *The need for a Hazard Communication Program*

The purpose of a Hazard Communication Program is to inform employees of the hazards associated with chemicals in their workplace and ensure the safe use, handling, and disposal of hazardous chemicals. The Bay Club Company’s Hazard Communication Program **provides safety guidelines and instructions for the use, handling and storage of chemical products in its Clubs**. This program requires that those working with chemical products be trained to work with them safely, and be informed about:

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| <ol style="list-style-type: none"> <li>1. Basic Requirement of a Written Hazard Communication Program</li> <li>2. Identification / list of the hazardous chemicals / substances</li> <li>3. Safety Data Sheets (SDS) for every chemical</li> <li>4. Labels and additional forms of warning</li> <li>5. Employee information and training</li> </ol> | <ol style="list-style-type: none"> <li>6. Labeled / unlabeled pipes</li> <li>7. Informing Contractors</li> <li>8. General Chemical Safety</li> <li>9. Proposition 65 Warning (right to know)</li> </ol> |
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### 1. Basic Requirement of a written Hazard Communication Program

As required by California’s Hazard Communication (HazCom) Regulation (T8 CCR 5194), TBCC 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 teams health and safety when handling, using storing or disposing of chemical products. The Hazard Communication Program manager in each club is the Club General Manager, who has full authority and responsibility for implementing and maintaining this program using labels, signs, Safety Data Sheets (SDSs), training, and additional methods of verbal and visual communication as appropriate. Use Addition Resources #6, #7 and #8 OSHA Quick Cards on Labels, Symbols and SDSs.



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**Managers,  
Supervisors and  
Trainers  
Responsibilities**

- Managers, Supervisors and Trainers at all levels carry the primary responsibility for ensuring the Hazard Communication Program is implemented properly within their department / area of supervision.
- Conduct immediate corrective action for deficiencies found in the program
- Maintain good communication with Associates who are trained (get feedback).
- Make this available to Associates (Post if necessary) and to Contractors (if needed)

**Associate  
Responsibilities**

- Always follow training instructions and mfg. recommendation for safest use, handling, storing and disposing of chemical products.
- **Use the recommended Personal Protective Equipment properly and report any issues that may develop with the PPE when using a chemical product.**

## **Identifying the Physical and Health Hazards**

Chemicals can produce an immediate threat of injury or death, as well as an undetected toxic affect over time. Always review the Safety Data Sheets for products you use in order to learn what physical and health hazards they can cause. Some chemicals are explosive, corrosive, flammable or toxic. Other chemicals are relatively safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, Associates and contractors working with chemicals at The Bay Club must know the hazards of the products and use safe-handling methods per SDS recommendations.

**Physical Hazards** affect us immediately like a chemical splash in the face and eyes (blindness, disfigurement). In order to eliminate these hazards, one needs to follow the safe-handling methods per SDS instructions. In addition, TBCC provides various types of PPE used when handling chemicals (see PPE Program). Physical hazards can produce a dangerous reaction causing damage to the body. The reaction can be a result of the physical properties of the chemical, such as flammability and corrosiveness. Learn to protect yourself from the chemical product you use.

**Health Hazards** affect us over time and can be undetected for many years causing damage to individual's health and well being and short and long term illnesses after exposure. Examples of short-term illnesses (acute) are headaches, nausea, and irritation. An example of a long-term (chronic) illness is cancer caused by prolonged exposure (See TBCC Prop65 Binders). The three primary routes of entry for chemicals causing health hazards are:

- **Inhalation**: Breathing gases, vapors, dusts, and mists that can be inhaled causing damage to the respiratory system and then absorbed by the bloodstream.
- **Absorption**: When chemicals come in contact with our skin or eyes and can be absorbed causing an illness.
- **Ingestion**: When intentionally or unintentionally we eat or drink chemicals.

## **2. Identification / list of the hazardous chemicals / substances**

Each Club must maintain an inventory of chemicals used to maintain and service its Clubs. See your local County, City and Fire Department requirements to report the inventory annually. Failure to report when required is a violation and can cause penalties.

## **3. Safety Data Sheets (SDS)**

Safety Data Sheets are documents created by Manufacturers to provide detailed information about chemicals. Areas where chemical products are used or stored must have a Safety Data Sheets Binder visible and accessible to anyone. The binder must be organized: index page, tabs, Safety Data Sheets and Safety Attendance Forms under each tab. Areas where these binders can be found include Kitchens, Maintenance Shops, Housekeeping, Pool/Whirlpool Pump room, Childcare and areas where chemicals are stored. TBCC is responsible to maintain updated Safety Data Sheets for chemicals used in its Clubs.

Associates using a chemical must be trained on its SDS to know details on the product and effectively use the product. There are 16 sections in a Safety Data Sheet. **A CalOSHA QuickCard on the 16 sections is part of this program and must be explained to those using chemicals ([English](#)) ([Spanish](#)).** In order for this program to be effective, all associates must know:

- The location of SDS Binders, Eyewash Stations, Drench Showers and AEDs
- How to access SDS Binders
- The Physical/Health hazards, PPE and first aid procedures for the chemical products they use
- To quickly locate the emergency information on the SDS
- To follow the safety practices provided in the SDS



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New or updated SDSs must be reviewed with affected associates by way of training, notice, memos, or other means of communication. If a Manager or Associate determines that an SDS is missing, incomplete or a new hazardous substance being used does not have an SDS, he/she must advise the Department Manager or General Manager so that a new SDS be requested from the manufacturer or researched online and placed in the SDS Binder. **Certain chemicals require the presence of an Eyewash Station and/or Deluge (Drench) Shower. Where this equipment is present, it must be easily accessible, kept clear of debris and maintained in working order.** The maintenance tags documenting monthly inspections must be up to date and visible.

An eyewash station or drench shower may not be installed in a room where chemicals are used/stored IF the room is too small or the presence or operation of the equipment would cause a greater risk during operation. The following shall apply:

- ✓ Use goggles when entering / working in the room (must be enforced)
- ✓ Emergency Eyewash Bottles must be present

## 4. Labels and additional forms of warning – Globally Harmonized System:

Warning labels are designed to alert a product user of the dangers using that product. All containers of chemical products must be properly labeled, from a 55-gallon drum to a spray bottle. **Associates must be trained to make sure the materials they are working with are properly labeled.** All containers must have either the original manufacturer’s label, or a label which includes the following:

- Product identity (trade, product, or chemical name) in English. Do not use chemical symbols or abbreviations.
- Appropriate hazard warnings (health and physical hazards)
- Name of the person affixing the label and the date

Associates must be instructed on how to read container labels so they can identify certain hazards by reading the label itself or the SDS. **Use the CalOSHA QuickCard on GHS Labeling ([English](#)) ([Spanish](#)) to explain to those using chemicals. All portable containers need to be labeled appropriately** any time a chemical is transferred from a labeled container for purposes other than its immediate use.

Rooms with certain amounts of chemical products require the National Fire Protection Association placard # 704 posted at the entrance of the room (visible when door is open), and outside the building. See [NFPA Warning Placard – \(location specific\) - 2016](#)

NFPA 704 (diamond sign)



Blue	=	Health Hazard	Level 4	=	Extreme
Red	=	Flammability	Level 3	=	Serious
Yellow	=	Reactivity	Level 2	=	Slight
White	=	Specific hazard	Level 1	=	Moderate

## 5. Employee information and training

Supervisors / Managers must provide Associates, including temporary employees and volunteers, as applicable, with information and training regarding hazardous substances in their work area. This applies upon initial assignment, upon reassignment and whenever a new hazardous substance is introduced into the work area. This training provides information on the following:

- The requirements of the hazard communication program including the employees’ rights under the regulations.
- The location and availability of the written hazard communication program.
- Any operation in their work area, including non-routine tasks, where hazardous substances are present and exposures likely to occur.
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
- Protective practices the department has taken to minimize or prevent exposure to these substances.
- How to read labels and review SDSs to obtain hazard information.
- Physical and health effects of the hazardous substances.
- Symptoms of overexposure.
- Employee use of proper engineering controls, work practices, and/or use of personal protective equipment to reduce risk of exposure.
- Emergency and first-aid procedures to follow if employees are exposed to hazardous substances.
- The location and explanation of warning signs or placards indicating a chemical known to cause cancer or reproductive toxicity is used in the workplace.

## 6. Labeled / Unlabeled Pipes (where applicable):

Above-ground pipes transporting hazardous substances (gases, vapors, liquids) shall be identified in accordance with [Title 8 California Code of Regulations, Section 3321: Identification of Piping \(a\)](#) *Where, in any one establishment, one or more hazardous substances are transported through pipe lines, all above ground piping systems used to transport gases, vapors, liquids, semi-liquids, or plastics shall be identified at points where confusion would introduce hazards to employees.*



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## 7. Informing Outside Contractors

TBCC is responsible to inform outside contractors of any chemical hazards present in the area of work by contractor, or on the path to the area of work by contractor.

## 8. General Chemical Safety

Assume all chemicals are hazardous. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects. The following are steps to keep in mind when handling chemicals:

- Know the product you are working with.
- Know where the SDS Binder is located, access it and read it.
- Never assume when working with chemicals.
- Only trained / designated Associates can use chemicals.
- Certain chemical mixtures can be deadly. Be careful!
- **EAT SOMEWHERE CLEAN / WASH YOUR HANDS**

## 9. Proposition 65 Warning – TBCC Binders

Proposition 65 is an environmental law in which chemicals suspected of posing a cancer or reproductive toxicity are regulated by the state of California. The basis of this Act is simple requirements of “no discharge” and “clear and reasonable warnings prior to exposure.” This proposition declares the people have the rights:

- To protect themselves from chemicals known to cause cancer, birth defects or other reproductive harm.
- To be informed about exposures to chemicals known to cause cancer, birth defects and other reproductive harm.
- To secure strict enforcement of the laws controlling hazardous chemicals and deter actions threatening public health and safety.

## 10. ADDITIONAL RESOURCES FOR MANAGERS AND TRAINERS:

The material and links below must be used as additional assistance for Managers and Trainers to raise their awareness about hazard communication and how they can use the material to best communicate with their teams.

Source	Material / Link	Audience
<a href="#">CalOSHA</a>	1. Regulations: <a href="#">California Code of Regulations, Title 8 section 5194, Hazard Communication</a> 2. Booklet: <a href="#">Guide to California Hazard Communication regulations</a> (46pages) 3. Booklet: <a href="#">Cal/OSHA Guide to Restaurant Safety</a> (53pages, see pages 38-40) 4. Posters (for Managers): <a href="#">Safety and Health Protection on the Job</a>	Trainers and Managers
<a href="#">FedOSHA</a>	5. Webpage: <a href="#">Hazard Communication</a> 6. OSHA Poster: Labels ( <a href="#">English</a> ) ( <a href="#">Spanish</a> ) 7. OSHA Poster: Pictograms ( <a href="#">English</a> ) ( <a href="#">Spanish</a> ) 8. OSHA Poster: Safety Data Sheet ( <a href="#">English</a> ) ( <a href="#">Spanish</a> ) 9. <a href="#">December 1st, 2013 Training Requirements for the Revised Hazard Communication Standard</a>	5. Mgrs/Trainers 6. ALL 7. ALL 8. ALL 9. Mgrs/Trainers
<a href="#">CDC / NIOSH</a>	10. Webpage: <a href="#">Hazard Communication for Disinfectants Used Against Viruses</a> (CoVID19)	10. Mgrs/Trainers
*Other Material	11. Video**: Safety Toolbox Talk: <a href="#">Chemical Safety &amp; Hazard Communication</a> (5:59) 12. Video**: Safety Toolbox Talk: SPANISH: <a href="#">Seguridad Química Y Comunicación de Peligros</a> (6:51)	Trainers and Managers ALL is ok
TBCC Safety Tips	13. Safety Tip on <a href="#">Housekeeping Chemicals</a> (EN/SP) 14. Safety Tip on <a href="#">Kitchen and Food Services chemicals</a> (EN/SP) These are created by TBCC. Post for ongoing training and compliance.	ALL

\* Mandatory for Trainers and Managers must watch to reinforce understanding and knowledge (may need to skip ads)

\*\* Mandatory for Trainers and Managers – Sharing all or segments with Associates is acceptable and encouraged as time allows

**RECORDS:** Records from each Club associated with this program are maintained by Club Managers and are available to HR for review and audit at any time. HR maintains records it receives or collects from each club in The Bay Club Company digital folders and files.

Please contact Human Resources with any questions | 888.830.7160 | [hr@bayclubs.com](mailto:hr@bayclubs.com)