

Hazard Communication Program Plan
Southern Regional Technical College
2023-2024

REVIEWED:  DATE: 3-27-23
HAZARD COMMUNICATION PROGRAM COORDINATOR
Southern Regional Technical College

APPROVED:  DATE: 3/28/23
PRESIDENT/EXECUTIVE
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REVIEWED: _____ DATE: _____
EMERGENCY MANAGER
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APPROVED: _____ DATE: _____
DIRECTOR OF PUBLIC SAFETY
TECHNICAL COLLEGE SYSTEM OF GEORGIA

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INTRODUCTION

The State Board of the Technical College System of Georgia (SBTCSG), along with its technical colleges and work units, is committed to providing a safe and healthful environment for its employees, students, volunteers, visitors, vendors and contractors. SBTCSG Policy II.D. Emergency Preparedness, Health, Safety and Security compels technical colleges and work units to ensure that information about the dangers of all hazardous materials used are known by all affected individuals. This Hazard Communication Program Plan (HCPP) is established to prevent the potentially injurious exposure to hazardous materials through the improper use, handling, transportation, containment, storage, or disposal of such materials under normal operating conditions or potentially during an emergency situation. This HCPP provides guidance for training regarding the contents of the Occupational Safety and Health Administration (OSHA) Hazard Communications Standard, 29 CFR 1910.1200 (along with the Georgia Public Employee Hazardous Chemical Protection and Right to Know Act of 1988 O.C.G.A. §45-22-1 to §45-22-12 as well as the Georgia Public Employee Hazardous Chemicals Protection and Right to Know Rules, 300-3-19-01 et seq. To this end, the HCPP is maintained, reviewed, exercised and updated at least annually to ensure compliance and protection for employees and students.

This Hazard Communication Program Plan includes the following topics:

- program administration
- exposure determination
- implementation of methods of exposure control
 - standard hazardous materials precautions
 - engineering and administrative controls
 - personal protective equipment (PPE)
 - housekeeping
 - laundry
- container labeling
- safety data sheets
- training and information
- hazardous non-routine tasks
- informing other employers/contractors
- hazardous material inventories
- evaluation and follow-up post-exposure to hazardous materials
- evaluation of circumstances surrounding exposure incidents
- chemicals in unlabeled pipes and
- program availability

I. PROGRAM ADMINISTRATION

- A.** The Hazard Communication Program (HCP)/Right to Know (RTK) Coordinator, has the overall responsibility for the Hazard Communication Program. The HCP/RTK Coordinator will review and update and then subsequently submit the HCPP to the TCSG System Office annually, or more frequently if necessary to reflect any new or modified tasks or activities; new or revised employee classifications or new instructional programs with potential injurious exposure to hazardous materials to ensure compliance and protection for all individuals.

Contact Information for HCP/RTK Coordinator

Ryan King
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- B.** Those individuals who are determined to be at risk of exposure to hazardous materials must comply with the procedures and practices outlined in this HCPP.
- C.** The assigned designees listed below are responsible for the implementation, documentation, review, training, and record keeping with respect to the areas of implementation of methods of exposure control, container labeling, safety data sheets, training and information.
- D.** *Southern Regional Technical College* engages in the following contractual agreements regarding hazardous materials communication: *Annual contract with MSDS Online*
- E.** *Southern Regional Technical College* engages in the following training, drills and exercises regarding hazardous materials communication. *See the master training log.* The protocol for the retention of training records is 3 years.
- F.** The protocol for the annual review of the *Southern Regional Technical College* HCPP is by the Southern Regional Technical College Safety Committee. The protocol for the retention of the HCPP is 3 years.

II. EXPOSURE DETERMINATION

Individuals are identified as having a risk of exposure to hazardous materials based on the tasks or activities in which they engage. "Covered" individuals are identified by the technical college or work unit as those employees or students who are at risk or vulnerable in the normal conduct of their tasks or activities for potentially injurious exposure to hazardous materials. A "covered" occupational task or activity is recognized as one in which risk of exposure is reasonably expected. These individuals include students as well as part-time, temporary, contract, and per-diem employees.

III. IMPLEMENTATION OF METHODS TO REDUCE EXPOSURE RISK

The individuals identified in I. C. are responsible for implementing and documenting the following methods to reduce exposure risk:

- A. Standard Precautions:** All covered individuals will use hazardous materials standard precautions as dictated by the task or activity. These standard precautions include adhering to appropriate prescribed engineering and administrative controls, personal protective equipment, housekeeping, and laundry.
- B. Personal Protective Equipment:**
 1. Appropriate personal protective equipment (PPE), including but not limited to: respirator, gloves, protective clothing, eye, and face protection, is provided to covered employees at no cost and available to covered students at the students' expense.
 2. Training/record keeping in the use of PPE for specific tasks is provided and maintained.
 3. Adequate supplies of the aforementioned equipment will be available in the appropriate size/fit.
 4. All covered employees and covered students using PPE must observe the following precautions:
 - a. Wear appropriate PPE when it is reasonably anticipated that there may be contact with hazardous materials; replace gloves or other protective clothing if torn or punctured, or if their ability to function as a barrier is compromised.
 - b. Utility gloves or other protective clothing may be reused if their integrity is not compromised. Utility gloves or other protective clothing should be discarded if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
 - c. Appropriate face and eye protection should be donned when splashes, sprays, spatters, or droplets of hazardous material pose a risk to the eyes, nose, or mouth.
 - d. Respiratory protection devices should be donned when vapors or fumes pose a risk to the respiratory system.
 - e. Disposable PPE should be discarded properly after each use.

IV. CONTAINER LABELING

- A.** The HCP/RTK Coordinator will review labeling procedures periodically and will update labels as required.
- B.** The individuals identified in I. C. are responsible for implementing and documenting the following container labeling requirements for their respective organizational areas:
 - 1. Verify all containers received for use are clearly labeled as to contents, appropriate hazard warning (both physical and health), and manufacturer's name and address.
 - 2. Defaced or missing labels are replaced quickly with an appropriate secondary label.
 - 3. All secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning(s). For assistance with labeling, contact the HCP/RTK Coordinator.
 - 4. Additional secondary labeling methods used by the technical college/work unit are described here: Until appropriate labels are delivered we mark containers with chemical name and description.
 - 5. For the following individual stationary process containers (such as storage tanks), a labeling system rather than a label is used to convey the required information: Signage is used to identify or name the contents of storage tanks, if used.
 - 6. Identify any in-house labeling system in use. Clear unmarked spray containers are used and the product identification is written on the container with a permanent marker.

V. SAFETY DATA SHEETS

- A.** The HCP/RTK Coordinator is responsible for establishing and monitoring the technical college or work unit SDS program.
- B.** The individuals identified in I. C. are responsible for implementing and documenting the following SDS requirements for their respective organizational areas.
 - 1. Procedures are developed to obtain the necessary SDSs and for the review of incoming SDSs for new or significant health and safety information. Any new information is communicated to affected employees. An alternate procedure will be followed when an SDS is not received at the time of initial shipment: If no SDS is provided with the initial shipment of the product, contact the Hazard Communication Coordinator who will find the appropriate SDS and make it available through MSDS online.
 - 2. Copies of SDSs for all hazardous materials to which covered individuals are exposed or are potentially exposed will be kept in readily accessible locations.

[Southern Regional Technical College Website > Quick Links > Safety Data Sheets](#) . If an SDS is not available, contact the Hazard Communication Coordinator.

3. SDSs will be readily available to covered individuals in each work area using the following format: [Southern Regional Technical College Website > Quick Links > Safety Data Sheets](#)
4. When revised SDSs are received, the following procedures will be followed to replace old SDSs: SDSs are automatically updated by MSDS online.

VI. TRAINING AND INFORMATION

A. HCP/RTK Coordinator is responsible for the HCCP training and will ensure that all program elements are carried out. The HCP/RTK Coordinator is responsible for maintaining the Master Training Log.

B. The individuals identified in I. C. are responsible for implementing and documenting the following training requirements for their respective organizational areas.

1. All covered individuals will receive an explanation of this HCCP during their initial training or academic experience, as well as a review on an annual basis.

2. All covered individuals who work with or are potentially exposed to hazardous materials will receive initial training on the Hazard Communication Standard and this HCCP before starting work and refresher training annually. Each new covered individual will attend training that includes the following content:

- an overview of the OSHA Hazard Communication Standard
- the hazardous materials present
- the physical and health risks of the hazardous materials
- symptoms of overexposure
- how to determine the presence or release of hazardous materials
- how to reduce or prevent exposure to hazardous materials through use of control procedures, administrative practices and personal protective equipment
- steps taken to reduce or prevent exposure to hazardous materials
- procedures to follow if covered individuals are overexposed to hazardous materials
- how to read labels and SDSs to obtain hazard information
- location(s) of the SDSs and written Hazard Communication Program Plan

3. Prior to introducing a new hazard into any organizational unit, each covered individual in that organizational unit will be given information and training as outlined above for the new hazard. The training format will be as follows: Classroom, Lab, or Online instruction –See attached training logs.

VII. HAZARDOUS NON-ROUTINE TASKS

Periodically, covered individuals are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting such tasks, each affected covered individual will be given information by the individuals identified in I. C. for their respective organizational area about the hazardous materials which may be encountered. This information includes specific chemical hazards, protective/safety measures, and steps being taken to reduce hazards, including ventilation, respirators, the presence of another employee/student (buddy systems), and emergency procedures.

Examples of non-routine tasks performed by covered individuals of the company are:

Task	Hazardous Material
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No non-routine tasks of this type have been identified at this time.

VIII. INFORMING OTHER EMPLOYERS/CONTRACTORS

A. The HCP/RTK Coordinator is responsible for providing other employers and contractors with information about hazardous materials that their employees/students may be exposed to on a given technical college/work unit site as well as suggested precautions for those employees/students. The HCP/RTK Coordinator is also responsible for obtaining information about hazardous materials used by other employers to which employees/students of the technical college or work unit may be exposed.

B. Other employers and contractors will be provided with SDSs for hazardous materials generated by the operations of the technical college or work unit in the following manner: Contractors will be provided access to MSDS Online through the Southern Regional Technical College website.

C. In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect employees/students exposed to operations performed by the technical college or work unit.

D. Other employers will be informed of the hazard labels used by the work unit or technical college. If symbolic or numerical labeling systems are used, the other employees will be provided with information to understand the labels used for hazardous materials for which their employees/students may have exposure.

IX. HAZARDOUS MATERIAL INVENTORIES

A. A biennial inventory of all known hazardous materials used by covered individuals is associated with this HCPP. This inventory includes the name of the chemical, the manufacturer, the work/study area in which the material is used, and quantity if it exceeds the Threshold Planning Quantity (TPQ). The inventory should be arranged to be able to cross-reference it with the SDS file and the labels on containers. Additional useful information, such as the manufacturer's telephone number, and emergency number, scientific name, CAS number, the associated task, etc., can be included. ((See these links for further information on TPQ the List of Extremely Hazardous Substances and Threshold Quantities find [Part A here](#) and [find Part B here](#).)

B. When new materials are received, the inventory is updated (including date the materials were introduced) within 30 business days. To ensure any new material is added in a timely manner, the following procedures shall be followed: Persons introducing new materials are responsible for notifying the HCP/RTK Coordinator, so the new material can be added to the inventory at MSDS Online.

C. The Hazardous Material Inventory is compiled and maintained and submitted to the TCSG System Office by Ryan King (229) 672-9315.

X. EVALUATION AND FOLLOW UP POST-EXPOSURE TO HAZARDOUS MATERIALS

A. Should an exposure incident occur, contact the supervisor responsible at the following telephone number: (229) 225-4096.

B. An immediate available confidential medical evaluation and follow-up will be conducted and documented by a licensed healthcare professional.

Following initial first aid the following activities will be performed:

1. Document the routes of exposure and how the exposure occurred.

C. During the period of the 2022-2023 HCPP *no exposure incident was reported*.

XI. EVALUATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS

A. The supervisor responsible will review the circumstances of all exposure incidents to determine:

1. engineering controls in use at the time;

2. administrative practices followed;

3. a description of the material being used (including type and brand);

4. protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.);

5. location of the incident;

6. task being performed when the incident occurred;

7. training records of covered employees or covered students.

B. If revisions to this HCPP are necessary *the supervisor responsible* will ensure that appropriate changes are made. (Changes may include an evaluation of safer

practices, review of training etc.)

- C. The following protocol is followed for evaluating the circumstances surrounding an exposure incident. A committee of peers will be established to investigate each incident.

XII. CHEMICALS IN UNLABELED PIPES

Prior to starting work in areas where chemicals are transferred through unlabeled pipes, covered individuals should contact the individuals identified in I. C. for their respective organizational area for information regarding the identity of the material in the pipes; potential hazards; and required safety precautions.

XIII. PROGRAM AVAILABILITY

A. All covered individuals can review this HCPP at any time while performing these tasks or activities by contacting their Department Head. If requested, a hard copy of this HCPP will be provided free of charge within 3 business days of request. Copies of the Hazard Communication Program Plan are available at all locations for review by any interested individuals.

B. A copy of this program will be made available, upon request, to employees, to students and their representatives. *Contact Ryan King at rking@southernregional.edu*