

# Hazard Communication Program Plan

## Lanier Technical College

### Academic year 2021-2022

REVIEWED:  DATE: 4/26/2021  
HAZARD COMMUNICATION PROGRAM COORDINATOR  
Lanier Technical College

APPROVED:  DATE: 4-28-2021  
PRESIDENT/EXECUTIVE  
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REVIEWED: \_\_\_\_\_ DATE: \_\_\_\_\_  
EMERGENCY MANAGER  
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APPROVED: \_\_\_\_\_ DATE: \_\_\_\_\_  
DIRECTOR OF CAMPUS SAFETY  
TECHNICAL COLLEGE SYSTEM OF GEORGIA



## **Hazard Communication Program Plan**

**Academic Year 2021-2022**

Effective August 16<sup>th</sup>, 2021

### **INTRODUCTION**

The State Board of the Technical College System of Georgia (SBTCSG), along with its work units and technical colleges, 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) has been 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 will provide 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. All operations and all organizational units will participate in the HCPP.

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, 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 academic programs with potential injurious exposure to hazardous materials to ensure compliance and protection for all individuals.

### Contact Information for HCP/RTK Coordinator

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 Gainesville, Georgia 30507  
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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.

See Appendix A: Program Administration.

## **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 work unit or technical college 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 part-time, temporary, contract, and per-diem employees.

- A. Lanier Technical College engages in the following contractual agreements regarding hazardous materials communication: MSDS On-Line (SDS database), Crystal Clean (chemical waste disposal), Earthwise (biohazard disposal)
- B. Lanier Technical College engages in the following training, drills and exercises regarding hazard materials communication. Training for anhydrous ammonia is conducted through the Economic Development department and the ammonia refrigeration program. Drills

are embedded in the program and conducted with each class offering. Training records are kept by the refrigeration program lead instructor.

- C. The protocol for the annual review of the Lanier Technical College HCPP is for the Director of Facilities to review the HCPP with each program or work area chair. The HCPP is reviewed and amended as needed. The updated HCPP is presented to the Vice President of Administrative Services for review and passed to the President for approval. The protocol for the retention of the HCPP is to post the document to the LTC Teams/Intranet where it is stored and backed up on two geographically separated servers.

### III. IMPLEMENTATION OF METHODS TO REDUCE EXPOSURE RISK

The individuals identified in APPENDIX A 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: respiratory, gloves, protective clothing, eye, and face protection, is provided to covered employees at no cost and available to covered students at the student's 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 as risk to the eye, nose, or mouth.
    - d. Respiratory protection devices should be donned when the vapors of 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. LTC Shipping/Receiving will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address.

Program Chairs/Directors will ensure that 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. LTC Facilities will assist with the creation of secondary labels as required. Those in need of a secondary label should submit a request through the Faculty & Staff Helpdesk ( <https://www.laniertech.edu/help-center/faculty-staff-helpdesk-form/> ) with the following information:

1. The full product name and manufacturer.
2. The size of the label required. Choices are: 1.25"x2.375", 2"x4", 3.5"x5", 5"x8.125", 8.5"x11"
3. The number of labels required.

- B. The individuals identified in APPENDIX A 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).
4. Additional secondary labeling methods used by the technical college/work unit are described here:
  - a. Temporary hand written labeling with all required information label to be dated and be in use no more than 48 hours
  - b. Permanent secondary labels will follow the GHS format
5. The following individual stationary process containers (such as storage tanks) are marked using, signs, placards, process sheets, batch tickets, operating procedures, or other such written materials) rather than a label to convey the required information: *Hall Campus, Deal Hall Anhydrous Ammonia*

#### 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 APPENDIX A 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: Receiver of material shall inform the Facilities team using the Faculty & Staff Helpdesk. List the material received, manufacturer, quantity received and the location in which they are stored.

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: On the intranet under MSDS on line. (or <https://chemmanagement.ehs.com/9/15A1C377-6A5E-49BF-A049-2C20F3187C31> ) If an SDS is not available, submit a request to have it added via the Faculty & Staff Helpdesk. Include the product name and manufacturer with the request so that we may identify the correct product. Attach the SDS if possible. Please also include the location in which it is being stored so that we can update the database with that information as well.
3. When revised SDSs are received by the Facilities team, the following procedures will be followed to replace old SDSs:
  - a. Digital or hard copy SDS are forwarded to the Administrative Assistant for the Director of Facilities, Tosha Barrett [tbarrett@laniertech.edu](mailto:tbarrett@laniertech.edu)
  - b. Tosha will have the new SDS added to our database.
  - c. Once the new SDS is in the database, Tosha will index the product so that secondary labels and reports can be rendered at a later date.

## VI. TRAINING AND INFORMATION

- A. The HCP/RTK Coordinator is responsible for maintaining the Master Training Log.
- B. The individuals identified in APPENDIX A 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 HCPP during their initial training or academic experience, as well as a review on an annual basis.
  2. Everyone who works with or is potentially exposed to hazardous materials will receive initial training on the hazard communication standard and this HCPP before starting work and refresher training annually. Each new covered individual will attend training that includes the following content:
    - a. an overview of the OSHA Hazard Communication Standard
    - b. the hazardous materials present
    - c. the physical and health risks of the hazardous materials
    - d. symptoms of overexposure
    - e. how to determine the presence or release of hazardous materials
    - f. how to reduce or prevent exposure to hazardous materials through use of control procedures, administrative practices and personal protective equipment
    - g. steps taken to reduce or prevent exposure to hazardous materials
    - h. procedures to follow if covered individuals are overexposed to hazardous materials

- i. how to read labels and SDSs to obtain hazard information
  - j. location(s) of the SDSs and written Hazard Communication Program Plan
3. Prior to introducing a new hazard into any organizational unit, each employee in that organizational unit will be given information and training as outlined above for the new hazard. The training format will be as follows: audiovisuals, interactive computer programs, classroom instructions, etc. to include all the information on the SDS sheet for the material.

## **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 APPENDIX A 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 (buddy systems), and emergency procedures.

Examples of non-routine tasks performed by covered individuals of the company are: none identified.

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

**B.** Other employers and contractors will be provided with SDSs for hazardous materials generated by the operations of the work unit or technical college in the following manner:

1. Printed copy of the current SDS will be provided to the employers and/or contractors with the purchase order for said work.
2. Or, a link to the SDS in the MSDSonline database

**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 exposed to operations performed by the work unit or technical college.

**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 may have exposure.

## **IX. HAZARDOUS MATERIAL INVENTORIES**

- A. An 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:
1. <https://www.govinfo.gov/content/pkg/CFR-2013-title40-vol29/pdf/CFR-2013-title40-vol29-part355-appA.pdf>
  2. <http://www.gpo.gov/fdsys/pkg/CFR-2013-title40-vol29/pdf/CFR-2013-title40-vol29-part355-appB.pdf>
- 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:
1. Shipping & Receiving Clerk shall Collect all incoming SDS sheets and convey them to the Administrative Assistant for the Director of Facilities
  2. Shipping & Receiving Clerk shall, in the absence of a SDS sheet, Collect MFG and the name of incoming chemicals. Next, convey the information to the Administrative Assistant for the Director of Facilities.
- C. The Hazardous Material Inventory is compiled and maintained and submitted to the TCSG System Office by the Director of Facilities, as requested by TCSG system office. This is typically due on January 1<sup>st</sup> and July 1<sup>st</sup> each year.

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

- A. The Campus Police should be called to assist in events that may lead to a risk of life, limb, or eye site or any other event that will require medical treatment.
- B. The Director of Facilities should be contacted for all events that do not satisfy the criteria in A, above.
- C. Either the Police, the Director of Facilities or his delegated representative will collect pertinent information as outlined in the Exposure Incident Report and Follow-Up Form. (Appendix B). This information will be retained for 30 years.



## **XI. EVALUATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS**

- A.** Executive Director of Facilities 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 employee or student
  
- B.** If revisions to this HCPP are necessary, the Director of Facilities will ensure that appropriate changes are made. (Changes may include an evaluation of safer practices, review of training etc.)

## **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 APPENDIX A 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**

All LTC Faculty and Staff may access this plan at any time by navigating to the LTC Teams/Intranet page. A link to our online SDS database is located there as well.

Students may be given a copy of this plan by their respective instructor, or may email their request for a copy to the HCP/RTK Coordinator listed on page 2 of this plan. Coordination for the delivery of a hard copy will be made through email upon receipt of request.



**Exposure Incident Report and Follow-Up Form**  
Exposure to Hazardous Materials

**INCIDENT REPORT**

Date of report: \_\_\_\_\_ Case No. (assigned by PD): \_\_\_\_\_

Name of person exposed: \_\_\_\_\_

Employee Number or Student Number: \_\_\_\_\_

If Student: Program/Course: \_\_\_\_\_

If Employee: Job Title: \_\_\_\_\_

Location of incident: \_\_\_\_\_

Date and time of incident: \_\_\_\_\_

Describe circumstances of exposure incident or attach report:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**FOLLOW-UP**

- Person involved in incident referred to appropriate health care professional for follow-up.
- Documentation of medical release is on file at work unit or technical college and clinical or work site (if appropriate). Alternate employment duties/academic activities assignment may be considered based on the opinion of the employee's/student's appropriate healthcare provider.
- Name, address and phone number of medical professional providing follow-up care:

\_\_\_\_\_  
\_\_\_\_\_

- Identify Individuals to whom copies were sent within 24 hours:

Exposed Person's Supervisor/Academic Coordinator:

\_\_\_\_\_

Work Unit or Technical College Hazard Communication Program Coordinator:

\_\_\_\_\_

Clinical or Work Site Contact Person:

\_\_\_\_\_

Name/Title of person preparing Exposure Incident Report and Follow-up Form:

\_\_\_\_\_

(Printed)

\_\_\_\_\_

(Signature)