

**Hazard Communication Program Plan
Central Georgia Technical College
2019-2020**

REVIEWED: _____ **DATE:** _____

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HAZARD COMMUNICATION PROGRAM COORDINATOR
CENTRAL GEORGIA TECHNICAL COLLEGE

APPROVED: _____ **DATE:** _____

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Hazard Communication Program Plan

Central Georgia Technical College

2019-2020

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
 - o standard hazardous materials precautions
 - o engineering and administrative controls
 - o personal protective equipment (PPE)
 - o housekeeping
 - o 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

James E. Faircloth, Jr., AVP Facilities
478-218-3385
80 Cohen Walker Drive
Warner Robins, GA 31088
jfaircloth@centralgatech.edu

- 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. Further, adequate supplies of the aforementioned equipment will be available in the appropriate sizes/fit.
See attached Appendix A: Central Georgia Technical College Program Administration Spreadsheet.
- D.** Central Georgia Technical College (CGTC) engages in the following contractual agreements regarding hazardous materials communication:
MSDS Online
- E.** CGTC engages in the following training, drills and exercises regarding hazard materials communication. Each academic course requiring hazardous materials reviews in orientation the necessary protocols for material handling, including documentation and safety procedures, in each semester. The protocol for the retention of training records is as described by legal requirement, including a minimum of 3 years.
- F.** The protocol for the annual review of the CGTC HCPP is by James E. Faircloth, Jr., AVP Facilities & Ancillary Services, then by Jeff Scruggs, EVP, then by Dr. Ivan H. Allen, President. The protocol for the retention of the HCPP is according to legal requirements, including but not limited to a minimum of 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: respiratory, 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 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 and will update labels as required.
- B. Those individuals identified in Appendix A will verify that all containers received for use will be clearly labeled as to the contents, notes the appropriate hazard warning, and list the manufacturer's name and address.

These same individuals 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. Contact James E. Faircloth, Jr. at 478-218-3385 or jfaircloth@centralgatech.edu for help with labeling.

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). For assistance with labeling, contact the HCP/RTK Coordinator.
4. Additional secondary labeling methods used by the technical college/work unit are described here: 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 contact the HCP/RTK Coordinator. All labels, including secondary container labels can be printed from MSDS Online. MSDS Online can be accessed from any college computer by clicking the icon on the desktop.
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: CGTC currently operates no individual stationary process containers on any campus.
6. Identify any in-house labeling system in use. CGTC is using an in-house labeling system that relies on colors, graphics, and /or numeric values to convey hazard information.

V. SAFETY DATA SHEETS

- A.** The HCP/RTK Coordinator is responsible for establishing and monitoring the CGTC 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: The identified individuals can look up the SDS information on MSDS Online. They can then send a request to the HCP/RIK Coordinator requesting the SDS be added to the appropriate folder. The HCP/RIK Coordinator can then add the SDS to the appropriate folder.
 - 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. CGTC uses MSDS Online for all SDS information. All SDS documents are located online. Access is simply made by double clicking the MSDS Online icon that is displayed on the college server. If an SDS is not available, contact James E. Faircloth, Jr., AVP Facilities & Ancillary Services.
 - 3.** SDSs will be readily available to covered individuals in each work area using the following format: Online access, with paper records available in each respective lab.
 - 4.** When revised SDSs are received, the following procedures will be followed to replace old SDSs: MSDS Online is responsible for keeping the SDS sheets up to date as part of the contract with CGTC.

VI. TRAINING AND INFORMATION

- A.** HCP/RIK Coordinator is responsible for the HCCP training and will ensure that all program elements are carried out. The Professional Development Training 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 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 HCPP 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: The training format may include audiovisuals, interactive computer programs, classroom instructions, online instructions.

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/student (buddy systems), and emergency procedures.

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

Task	Hazardous Material
Stripping Tile Floor	Ammonia Solution
Deglazing Auto Engine Block	Mineral Spirits
Making Diluted Chemical Solutions	Concentrated Acids

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 CGTC in the following manner: Contact HCP/RTK Coordinator for any SDS needed.

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 CGTC.

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: <http://www.gpo.gov/fdsys/pkg/CFR-2013-title40-vol29/pdf/CFR-2013-title40-vol29-part355-appB.pdf>
<http://www.gpo.gov/fdsys/pkg/CFR-2013-title40-vol29/pdf/CFR-2013-title40-vol29-part355-appA.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: When the HCP/RTK Coordinator is made aware of any new materials the SDS for that material will be added to the Hazardous Material Inventory and SDS folder.
- C.** The Hazardous Material Inventory is compiled and maintained and submitted to the TCSG System Office by James E. Faircloth, Jr. 478-218-3385.

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

- A. Should an exposure incident occur, contact James E. Faircloth, Jr. 478-218-3385.
- B. An immediate available confidential medical evaluation and follow-up will be conducted and documented by a licensed health care professional.
 - 1. Following initial first aid the following activities will be performed:
Appropriate college incident report is then filled out and sent to the HCP/RTK Coordinator and a copy sent to HR.
 - 2. Document the routes of exposure and how the exposure occurred.
- C. During the period of the 2018-2019 HCPP the following incidents surrounding exposure occurred: No incidents reported.

XI. EVALUATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS

- A. James E. Faircloth, Jr., HCP/RTK Coordinator 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 covered student.
- B. If revisions to this HCPP are necessary James E. Faircloth, Jr. HCP/RTK Coordinator 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. Each incident is documented by those present, including circumstances related to incident immediately prior to incident. The appropriate supervisory personnel review, and document steps taken to mitigate 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 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 AVAILABILTY

A. All covered individuals can review this HCPP at any time while performing these tasks or activities by contacting James E. Faircloth, Jr., AVP for Facilities & Ancillary Services. 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 for review by any interested individuals through:

Michelle Siniard, VPA
80 Cohen Walker DR
Warner Robins, GA 31088
578-218-3330

B. A copy of this program will be made available, upon request, to employees, to students and their representatives through:

Michelle Siniard, VPA
80 Cohen Walker DR
Warner Robins, GA 31088
578-218-3330

Appendix A**Central Georgia Technical College Program Administration**

Program or Work Area	Contact Name	Contact Information
VP for Adult Education	Brenda Brown	478-218-3288
VP for Institutional Effectiveness	Deborah Burks	478-757-3514
VP for Satellite Operations	Dana Davis	478-445-2301
AVP for Facilities and Ancillary Services	James Faircloth	478-218-3385
VP for Economic Development	Andrea Griner	478-757-3551
VP for Academic Affairs	Amy Holloway	478-757-3510
VP for Student Affairs	Craig Jackson	478-757-3508
AVP for Enrollment Services, Marketing, and Public Relations	Janet Kelly	478-218-3319
AVP for Advancement	Tonya McClure	478-757-3467
AVP for Academic Affairs	DeAnn Nester	478-218-3366
Chief Operating Officer - VECTR	Patricia Ross	478-218-3914
Executive Vice President	Jeff Scruggs	478-218-3333
VP for Administrative Services	Michelle Siniard	478-218-3330
Chief Information Officer	Brian Snelgrove	478-218-3300
Chief of Police / Security	Bob Wilbanks	478-218-3323
Director of Facilities	Robert Dominy	478-757-3579
Director of Human Resources	Carol Dominy	478-218-3700
Executive Director of Conduct, Appeals, Compliance, Title IX	Cathy Johnson	478-218-3309
Associate Dean of Academic Affairs	Jackie Turner	478-445-2330
Dean of General Education	Shannon Durham	478-218-3228
Dean of Business and Computer Technologies	Sabrina Swann	478-757-2536
Dean of Health Sciences	Paula Pena	478-218-3200
Dean of Public Safety / Professional Services	Jay Kramer	478-757-3576
Dean of Aerospace, Trade and Industry	Mike Engel	478-757-3473
Dean of Distance Education	Cynthia Rumney	478-476-5158