Hazard Communication Program Plan
Oconee Fall Line Technical College
2020-2021

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, including standard hazardous materials precautions, engineering and administrative controls, personal protective equipment (PPE), housekeeping, and 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
- Program availability

I. PROGRAM ADMINISTRATION

A. The Hazard Communication Program (HCP)/Right to Know (RTK) Coordinator has the direct 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

Marcus Rogers
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Office Phone: 478-274-7871
Cell Phone: 478-697-9564

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.

PROGRAM/WORK AREA	CONTACT	PHONE NUMBER
Air Conditioning Technology	Kevin Livingston	478-274-7870
Automotive Technology	Gary Simpson	478-274-7867
Basic Sciences	Susan McGill	478-553-2145
Construction Services	Open	N/A
Cosmetology	Lisa Jones	478-274-7844
Diesel Technology	Brent Redfern	478-274-7864
Early Childhood Care & Education	Gail Clark	478-274-7799
Electronics Technology	Lee Radney	478-274-7862
Facilities / Maintenance	Ragan Green	478-274-7865
	Jim Harrison	478-553-2108
EMT / Paramedic Technology	David Carver	478-296-6186
Industrial Systems / Electrical	Mark Stewart	478-552-2112
Machine Tool Technology	David Hall	478-274-7985

PROGRAM/WORK AREA	CONTACT	PHONE NUMBER
Medical Assisting	Brenda Gurr	478-274-7885
Nursing	Suann McNutt	478-553-2099
	Ranna Weigel	478-274-7883
Nurse Aide	Anna Ryals	478-274-7736
	DeAnne Lindsey	478-553-2100
Pharmacy Technology	Jack Shepherd	478-274-7743
Radiologic Technology	Open	N/A
Respiratory Care	Natalie Smith	478-274-7881
Transportation	Joey Wooten	478-274-7851
	Gerald Burten	478-553-2396
Welding Technology	Josh Bridges	478-274-7869
	Jeff Partridge	478-625-6011
	Tony Simmons	478-553-2113

The following is a list of job and/or student program classifications that present the opportunity for potentially injurious exposure to hazardous materials:

Job/Program Titles and Occupational/Program Areas

Air Conditioning Technology	Automotive Technology	Basic Sciences
Construction Services	Cosmetology	Diesel Technology
Early Childhood Care and Ed.	Electronics Technology	EMT/Paramedic Tech
Facilities/Maintenance	Industrial Systems/Electrical	Janitorial Services
Machine Tool Technology	Medical Assisting	Nursing
Nurse Aide	Pharmacy Technology	Radiologic Technology
Respiratory Care	Safety/Security	Transportation
Welding Technology		

D. OFTC does not engage in any contractual agreement regarding hazardous materials communication. OFTC does utilize 'MSDSonline' to manage our inventory of materials and safety data sheets.

E. OFTC engages in the following training, drills, and exercises regarding hazard materials communication:

- Materials training is provided to all students within their program by instructors.
- Materials training is provided to employees by their supervisors.
- Annual training is provided to all employees by the HCP Coordinator.
- The HCP is exercised annually, usually in conjunction with another exercise.

Training records are maintained in each program/work area. Exercise/drill records are maintained by the HCP Coordinator.

F. The OFTC HCPP is reviewed annually prior to submission to TCSG. The HCPP is maintained in the office of the Chief, Security and Facilities; a copy is maintained for three 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 paragraph 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 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 and will update labels as required. This process will include the use of 'MSDSonline,' safety inspections, input/correspondence from assigned designees, and periodic checks of locations where hazardous materials are utilized and stored.

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. OFTC does not utilize any type of additional secondary labeling methods.
5. OFTC does not operate any stationary process containers on any campus.
6. OFTC does not used an in-house labeling system.

V. SAFETY DATA SHEETS

A. The HCP/RTK Coordinator is responsible for establishing and monitoring the OFTC Safety Data Sheet (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 necessary SDSs and for the review of incoming SDSs for new or significant health and safety information. Any new information will be communicated to affected employees and/or students. If an SDS is not received at the time of initial shipment, utilize the following (alternate) procedure in an attempt to locate it:

a. Search the MSDSonline system for the missing SDS. If the SDS is located, complete the following steps:

- Click the box beside the newly located SDS.
- Select "Assign to Company List" from the *Product Options* box.
- Complete the *Submission Details* section by selecting the appropriate reason for the submission. Add any comments you wish to include in the *Comments* box.
- Complete the *Contact Information* section.
- Click the *Submit* button at the bottom of the screen.
- The HCPP/RTK Coordinator will then approve the submission.

b. If the SDS cannot be located in the MSDSonline system, complete the following steps:

- Visit the vendor's website site to locate the appropriate SDS, or
- Visit the Manufacturer's website to locate the appropriate SDS, or
- Search the internet for the appropriate SDS, or
- Call the vendor or manufacturer and request an email copy of the SDS.

c. If this search is unsuccessful, send an email request to the HCP/RTK Coordinator for assistance. The email request must contain the following information:

- Product name
- Manufacturer's name
- Supply vendor's name
- All product codes or catalog numbers associated with the chemical

The HCP/RTK Coordinator will attempt to locate the appropriate SDS and/or submit a request for MSDSonline to request the SDS from the manufacturer.

2. Copies of SDSs for all hazardous materials to which covered individuals are exposed or are potentially exposed will be kept in the MSDSonline SDS management system. If an SDS is not available contact the HCP/RTK Coordinator.
3. SDSs will be readily available to covered individuals in each work area using the following format: electronic format via the intranet and internet using the MSDSonline SDS management system. 'Hardcopy' paper SDS files are not maintained.
4. When revised SDSs are received, the following procedures will be followed to replace old SDSs: newly received SDSs for existing products should be directed to the HCP/RTK Coordinator via email or interoffice mail for inclusion.

The MSDSonline SDS Management System can be accessed via a link on the OFTC Safety and Security webpage or by using the following web address:

https://msdsmanagement.msdsonline.com/?ID=E46DAF44-6CCA-4717-862C-A4FA9BBA78FE

In addition, MSDS may be accessed through an icon on the desktop of OFTC computers. Contact the HCP/RTK Coordinator for questions or problems accessing the MSDSonline System.

A backup written copy of the chemicals inventory will be provided to each campus location on a semi-annual basis (January and July) to provide access in the event of an internet or intranet failure.

All programs or work areas have the option to develop and maintain a SDS binder of printed SDS for use by students or faculty in their program areas. However, it will be the responsibility of the program instructors to maintain current SDS information at all times. **The official chemicals and hazardous materials inventory for the college will be that version located in the MSDSonline System**.

VI. TRAINING AND INFORMATION

A. The 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 listed 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 HCPP 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 element, 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 individuals listed in I.C. will provide training on the new material to covered individuals appropriately. The HCP/RTK Coordinator may assist, if necessary, as requested.
- Alternatively, organizational elements may request that training be conducted by the HCP/RTK Coordinator.
- A training log must be maintained by each individual trainer and a copy provided to the HCP/RTK Coordinator annually.

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 (buddy systems), and emergency procedures.

OFTC currently does not perform any hazardous, non-routine tasks on any campus.

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 OFTC premises/property 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 OFTC or the work unit. Facilities Directors may print SDSs directly from the MSDSonline system or make a request for the information to the HCP/RTK Coordinator.

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 OFTC or the work unit.

D. Other employers will be informed of the hazard labels used by the work unit or OFTC. 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. 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, tec., can be included. See these sites for further information on TPQ:

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: the submission of the SDS for the new chemical into the MSDSonline system initiates the SDS approval process by the HCP/RTK Coordinator. Once the SDS is approved, the new chemical is automatically placed into the system. The most complete list can then be generated at any time.

C. The Hazardous Material Inventory is compiled, maintained, and submitted to the TCSG System Office by Marcus Rogers, HCP/RTK Coordinator, 478-274-7871.

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

A. Should an exposure incident occur, contacts will be made in accordance with the type of and severity level of incident/situation at hand:

1. Serious incidents/situations and emergencies will be reported to 911 immediately for appropriate response(s). Secondary contacts will be made with the Vice President of Facilities, Planning, and Research at 478-274-7775 and the HCP/RTK Coordinator at 274-7871 respectively.
2. Non serious situations will be reported to the HCP/RTK Coordinator at 478-274-7871.
3. After an exposure incident, the appropriate person (exposed person's supervisor/ instructor/dean/coordinator) will complete an OFTC Accident Report Form online, which has been modified to include exposure incident information. The form can be found in Office365, SharePoint, under the Forms & Documents tab, further in the Safety & Security folder.

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: procedures called for/required by SDS, transport for medical evaluation, and medical attention as required/necessary.
2. Document the routes of exposure and how the exposure occurred.

C. During the period of the 2017-2018 ECP the following incidents surrounding exposure occurred: one small (1) bloodborne injury at clinical site in Nov 2017.

XI. EVALUATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS

A. The OFTC Provost and Chief, Security and 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 Provost 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:

1. Review location of exposure
2. Talk with witnesses and individual exposed
3. Review how incident occurred including contributing factors
4. Review controls in place at time of exposure
5. Review extent of contaminated area
6. Review exposure details
7. Review any other information available

XII. CHEMICALS IN UNLABELED PIPES

Prior to starting work in areas where chemicals are transferred through unlabeled pipes, covered individuals should contact the individuals 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 AVAILABILTY

A. All covered individuals can review this HCPP at any time while performing these tasks or activities by contacting the HCP/RTK Coordinator. 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 in the office of the Vice President of Facilities, Planning, and Research, the office of the Chief, Security and Facilities, and on the OFTC website on the Safety and Security page for review any interested individuals.

B. A copy of this program will be made available, upon request, to employees, to students, and their representatives. As stated above, a copy of the plan is posted on the Safety and Security page of the OFTC website; it can be viewed and printed at that location, or from Office 365, Sharepoint, Forms & Documents tab, in the Safety & Security folder. A request for a hard-copy of the HCPP will be made to the HCP/RTK Coordinator, who is responsible for the availability of this plan.