Procedure: 7.2.1p4.
Hazard Communication Program Planning and Hazardous Material Inventory

Revised:	November 16, 2020; January 17, 2017; and November 7, 2013.
Last Reviewed:	March 22, 2024; April 11, 2023; September 15, 2022; November 16, 2020; and October 30, 2017.
Adopted:	March 3, 1994.

I. PURPOSE:
A Hazard Communication Program Plan (HCPP) is established to inform employees and students of the hazardous properties of chemicals they work or study, safe handling procedures, and measures to take to protect employees and students from these chemicals. In addition, an HCPP will inform employees of 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.) A Hazardous Material Inventory provides but is not limited to physical and chemical characteristics and health hazard effects. The President is directly responsible for implementing this procedure and shall provide sufficient resources, personnel, and administrative support to accomplish this end.

II. RELATED AUTHORITY: N/A

III. APPLICABILITY:
All work units (where applicable) and Technical Colleges associated with the Technical College System of Georgia.

IV. DEFINITIONS:
Administrative Controls: Those work procedures such as written safety policies, rules, supervision, schedules, and training to reduce the duration, frequency, and severity of exposure to hazards or situations.

Container: A container is any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains hazardous material (e.g., chemicals, gases).

Covered individuals are identified by the Technical College or work unit as 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 and part-time, temporary, contract, and per-diem employees.

Engineering Controls: Engineering controls include those methods built into the design of

a production area, equipment, or process to minimize the risk of exposure to a hazard.

Globally Harmonized System (GHS) of Classification and Labeling of Chemicals: The GHS is a system for standardizing and harmonizing the classification and labeling of materials. GHS is intended to define health, physical and environmental hazards of materials; create classification processes that use available data on chemicals for comparison with the defined hazard criteria; and communicate hazard information, as well as protective measures, on labels and Safety Data Sheets (SDS).

Hazardous Material: Any material that is a health hazard or a physical hazard and includes not only generic chemicals but also paints, cleaning compounds, inks, dyes, and many other common substances.

Hazardous Chemical Standard 2012 (HCS): The Hazard Communication Standard (HCS), often called HazCom or employee Right to Know law, is a set of regulations first promulgated in 1988 and last updated in 2012 by the Office of Occupational Safety and Health Administration (OSHA). The Standard's purpose is to ensure that the hazards of workplace materials are evaluated, and that information on the hazards is provided to employers and covered employees, and covered students.

Health Hazard (Chemical/Material): A chemical/material for which there is statistically significant evidence based on at least one study conducted per established scientific principles that acute or chronic health effects may occur in exposed employees or students.

Label: A label is an appropriate group of written, printed, or graphic information elements concerning a hazardous material that is affixed to, printed on, or attached to the immediate container of hazardous material or the outside packaging.

Occupational Exposure: The exposure through any route of entry (*e.g.,* inhalation, ingestion, skin contact, or absorption) to potentially harmful chemical, physical, or biological agents that occurs as a result of a covered employee or covered employee's occupational tasks.

Physical Hazard (Chemical/Material): A chemical/material for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive), or water-reactive.

Safety Data Sheet (SDS): An SDS contains the written or printed material concerning a hazardous material that is prepared per 29 CFR Occupational Health and Safety Standards: Toxic and Hazardous Substances: Hazard Communication 1910.1200 (g) United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and published it in the Federal Register in March 2012 (77 FR 17574).

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.

V. ATTACHMENTS:

Attachment 7.1.1p4.a1. – TCSG Hazard Communication Program/Right to Know Plan

(HCPP) Template
Attachment 7.1.1p4.a2 – Exposure Incident Report and Follow-Up Form for Exposure to Hazardous Materials Exemplar
Attachment 7.1.1p4.a3. – Hazard Communication Program Planning Resources

IV. PROCEDURE:

a. The President/Executive is directly responsible for the implementation of this procedure. Accordingly, the President/Executive shall provide sufficient resources, personnel, and administrative support to accomplish this end.

b. This procedure intends to develop plans and establish procedures to safeguard the health and safety of employees and students of the work units and Technical Colleges of the Technical College System of Georgia when working in contact with or in proximity to hazardous materials. Each Technical College or work unit shall develop and implement, in coordination with the Georgia Department of Labor, a Hazard Communication Program Plan (HCPP) to address measures to protect and appropriately train covered employees and covered students working in contact with or in proximity to hazardous materials at primary work sites/campus locations, satellite locations, and off-campus sites.

c. The Technical College or work unit shall assign a single individual as the Hazard Communication Program Plan/Right to Know (HCP/RTK) Coordinator to monitor compliance, hazardous material safety practices, incidents, and practical training. The HCP/RTK Coordinator should hold professional credentials and expertise concerning occupational safety and hazard communication in the workplace. Additional personnel and departments may also be identified to fulfill the requirements of the HCPP.

d. The HCPP shall be maintained, reviewed, exercised, and updated at least annually to ensure compliance and protection for covered employees and covered students by the Technical College or work unit concerning compliance with state and federal guidelines, including those of the Occupational Safety and Health Administration as well as of the Georgia Department of Labor.

e. Each Technical College or work unit shall submit a Hazardous Material Inventory of those hazardous materials used, stored, or manufactured by the unit to the TCSG System Office for review no later than June 30 and December 31 of each calendar year.

f. The Technical College or work unit shall document and implement protocols for the containment, labeling, storage, and disposal/removal of hazardous materials.

g. An employee information poster describing employee rights under O.C.G.A. §45-22-1 to §45-22-12 shall be posted in all appropriate workplaces in a prominent manner so that it is routinely visible to all employees. In addition, for those workplaces in geographically dispersed work areas, a poster shall be placed in each work area.

h. The HCP/RTK Coordinator shall make arrangements for and/or ensure training in hazardous materials for all covered employees and students at risk for exposure. Training is required prior to the initial assignment of a covered employee to a workplace, and periodic retraining is required on at least an annual basis. Training for covered students is required prior to initial participation in each applicable course, with periodic retraining if indicated. The HCP/RTK Coordinator shall maintain a master log of all associated training activities, which shall be maintained for at least three (3) years after the training is completed. Employee training on the notification and use of hazardous materials shall be documented in the employee's personnel file. Student training should be similarly documented.

i. Each Technical College or work unit shall provide appropriate personal protective equipment (PPE) for use by covered employees and as required in each work environment. In addition, it shall provide training to covered employees on the use and maintenance of this equipment. PPE for covered students may be made available at the student's expense.

j. All hazardous materials introduced into the workplace by employers and used in the workplace by covered employees or covered students shall be in labeled containers that meet the requirements of the Occupational Safety and Health Administration standard.

k. The President shall submit the reviewed HCPP to the TCSG System Office not later than May 1st of each calendar year and then for subsequent approval by the Georgia Department of Labor.

l. The System Office shall review, coordinate revisions, and approve the HCPP. In addition, the System Office will provide technical assistance for developing and reviewing processes and training, drills, and exercises.

VI. RECORD RETENTION:

The currently implemented HCPP and its revisions shall be retained for three years. Required confidential medical records of covered employees and covered students must be retained for the duration of employment or attendance plus 30 years. Training records of covered employees and students must be retained for three years. An Incident Log must be retained for at least five years following the end of the calendar year covered.

Attachment 7.1.1p4.a1. TCSG Hazard Communication Program/Right to Know Plan (HCPP) Template
Revised 09/17/2018.

Hazard Communication Program Right to Know Plan

{Technical College Name}

{Insert Academic Year}

Hazard Communication Program
Right to Know Plan
{Technical College Name}
{Insert Academic Year}

REVIEWED: _____ **DATE:** _____
HAZARD COMMUNICATION PROGRAM COORDINATOR
{TECHNICAL COLLEGE NAME}

APPROVED: _____ **DATE:** _____
PRESIDENT/EXECUTIVE
{TECHNICAL COLLEGE NAME}

REVIEWED: _____ **DATE:** _____
EMERGENCY MANAGER

TECHNICAL COLLEGE SYSTEM OF GEORGIA

APPROVED: _____ **DATE:** _____
DIRECTOR OF CAMPUS SAFTEY

TECHNICAL COLLEGE SYSTEM OF GEORGIA

Hazard Communication Program/Right to Know Plan
{Technical College Name}
{Insert Academic Year}

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 is known by all affected individuals. This Hazard Communication Program Plan (HCPP) is established to prevent 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. In addition, 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 and 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 is responsible 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

_____
_____
_____
_____

B. Individuals 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 concerning the implementation of exposure control methods, container labeling, safety data sheets, training, and information. Further, adequate supplies of the equipment, as mentioned earlier, will be available in the appropriate sizes/fit. {*May be detailed in an appended document. Include Contact Information for Responsible Person(s) or Department(s) and a list of job and/or student program classifications that have potential for occupational exposure. Include a list of the tasks or activities or groups of closely related tasks or activities in which occupational exposure may occur for these individuals.}*

D. *{Technical College or Work Unit Name}* engages in the following contractual agreements regarding hazardous materials communication *(list here.)*

E. *{Technical College or Work Unit Name}* engages in the following training, drills, and exercises regarding hazard materials communication. *{Describe the training, drills, and exercises performed during the previous academic year.}* The protocol for the retention of training records is _____. *{Describe the protocol for the retention of training records here.}*

F. The protocol for the annual review of the *{Technical College or Work Unit Name}* HCPP is _____. *{Describe the protocols for the annual review of the HCPP.}* The protocol for the retention of the HCPP is _____. *{Describe the protocol for the retention of the HCPP here.}*

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. In addition, a "covered" occupational task or activity is recognized as one in which the risk of exposure is reasonably expected. These individuals include students and 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 students at the student's expense.
2. Training/record keeping in using PPE for specific tasks are provided and maintained.
3. Adequate equipment supplies, as mentioned earlier, 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 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 appropriately discarded after each use.

IV. CONTAINER LABELING

A. The HCP/RTK Coordinator will review labeling procedures periodically and will update labels as required. *{Describe the process here; it may be detailed in an appended document.}*

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 that all containers received for use are 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 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: *{May be detailed in an appended document.}*
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:
   {List stationary process containers and description of labeling system used, i.e., signs, placards, process sheets, batch tickets, operating procedures, or other such written materials; may be detailed in an appended document.}
6. Identify any in-house labeling system in use. *{Describe any in-house system which used numbers or graphics to convey hazard information.}*

C. 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 to review 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: {*Describe the procedure to be followed here.}*
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. *{List location(s).}* If an SDS is not available, contact _____*{insert name of responsible person and/or position}.*

3. SDSs will be readily available to covered individuals in each work area using the following format: *{Describe the format here; if an alternative to paper copies of SDSs is used, describe the format and how covered individuals can access them.}*
4. When revised SDSs are received, the following procedures will be followed to replace old SDSs: *{Describe procedures.}*

VI. TRAINING AND INFORMATION

A. HCP/RTK Coordinator is responsible for the HCCP training and will ensure that all program elements are carried out. In addition, 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 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 the use of control procedures, administrative practices, and personal protective equipment
- steps are 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: *{Describe training formats, such as audiovisuals, interactive computer programs, classroom instructions, etc. here.}*

VII. HAZARDOUS NON-ROUTINE TASKS

Periodically, covered individuals are required to perform hazardous non-routine tasks. Examples of non-routine tasks are confined space entry, tank cleaning, and painting reactor vessels. Before starting such tasks, each affected covered individual will be given information by the individuals identified in I. C. for their respective organizational areas about the hazardous materials that may be encountered. This information includes specific chemical hazards, protective/safety measures, and steps 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**

{May be detailed in an appended document.}

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: *{Describe policy here.}*

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. For example, suppose symbolic or numerical labeling systems are used. In that case, the other employees will be provided with information to understand the labels used for hazardous materials to 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 the quantity if it exceeds the Threshold Planning Quantity (TPQ). The inventory should be arranged to cross-reference with the SDS file and the labels on containers. Additional helpful information, such as the manufacturer's telephone number, 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 and Part B.

B. When new materials are received, the inventory is updated (including the date the materials were introduced) within 30 business days. To ensure any new material is added promptly, the following procedures shall be followed: *(Identify procedures to be followed here.)*

C. The Hazardous Material Inventory is compiled and maintained and submitted to the TCSG System Office by_____ {*insert name of the responsible person} and/or position and telephone number}*.

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

A. Should an exposure incident occur, contact _____ *{insert name of responsible person or department}* at the following telephone number.

B. An immediately 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:
   2. Document the routes of exposure and how the exposure occurred.

C. The following incidents surrounding exposure occurred during the *{insert previous academic year}* HCPP. *{Describe exposure incidents for the previous academic year here.}*

XI. EVALUATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS

A. {*insert name of responsible person or department}* 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. the task being performed when the incident occurred;
   7. training records of a covered employee or covered student.

B. If revisions to this HCPP are necessary, {*insert name of responsible person or department|}* will ensure that appropriate changes are made. (Changes may include evaluating safer practices, reviewing training, etc.)

C. The following protocol is followed for evaluating the circumstances surrounding an exposure incident _____. *{Describe the protocol for evaluating the circumstances*

surrounding an exposure incident here.}

XII. CHEMICALS IN UNLABELED PIPES

Before 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 areas 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 _____. If requested, a hard copy of this HCPP will be provided free of charge within three business days of request. In addition, copies of the Hazard Communication Program Plan are available for review by interested individuals.
B. A copy of this program will be made available, upon request, to employees, students, and their representatives. *{Describe the methods by which the program is made available and identify the individual to whom this responsibility falls.]*

Attachment 7.1.1p4.a2. Exposure Incident Report and Follow-Up Form for Exposure to Hazardous Materials Exemplar

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

INCIDENT REPORT

Date of report: _____

Name of the person exposed:_____

Employee Number or Student Number:_____

If Student: Program/Course:_____

If Employee: Job Title:_____

Location of incident:_____

Date and time of incident:_____

Describe the circumstances of the exposure incident or attach a report:

_____
_____
_____
_____
_____
_____

FOLLOW-UP

- ☐ person involved in the incident was referred to an appropriate health care professional for follow-up.
- ☐ documentation of medical release is on file at the work unit or Technical College and clinical or work site (if appropriate). Alternate employment duties/academic activities assignments 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 the person preparing Exposure Incident Report and Follow-up Form:

_____ _____

(Printed) (Signature)

Attachment 7.1.1p4.a3. Hazard Communication Program Planning Resources

Occupational Safety and Health Administration (OSHA) Hazard Communication Standard 29 CFR 1910.1200 available at https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099

Public Employee Hazardous Chemical Protection and Right to Know Act of 1988 O.C.G.A. §45-22-1 to §45-22-12.

Public Employee Hazardous Chemicals Protection and Right to Know Rules, 300-3-19-01 et seq. http://www.state.ga.us/rules/index.cgi?base=300/3/19