



# Hagerstown Community College

## Hazard Communication Plan

### **INTRODUCTION:**

The administration of Hagerstown Community College is committed to preventing accidents and ensuring the safety and health of our employees. The College will comply with all applicable federal and state health and safety regulations. This Hazard Communication Program is based on the requirements of the Standard (HazCom 2012), 29 CFR 1910.1200. Occupational Safety Health Administration (OSHA) Hazard Communication Standard protects employees (and student workers) who may be exposed to hazardous chemicals. Hagerstown Community College has developed written procedures that meet the standards set forth by OSHA.

### **POLICY:**

Under this program HCC employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. These chemicals may be physical or health-related.

This program applies to all work operations on the HCC College Campus where there is the possibility of exposure to hazardous chemicals under normal working conditions or during an emergency situation. All the appropriate departments from the College will participate in the Hazard Communication Program. Hagerstown Community College has identified primary divisions on campus that have direct contact with hazardous chemicals. The College realizes other divisions and employees on campus may have a limited amount of exposure or involvement with hazardous chemical. The primary divisions at HCC have been identified as follows:

- Mathematics and Science Division, STEM Building (faculty and staff)
- Allied Health, Career Programs Building (faculty and staff)
- Facilities Management, Campus Wide - Facilities, Custodial & Grounds Keeping (staff)
- Continuing Education, Career Programs Building (faculty and staff)
- Technology and Computer Studies, Advanced Training Center, Faculty and Staff
- Public Safety, Campus Wide (police and security)
- Visual Art and Kepler Theater - (faculty and staff)
- Food Services, Student Center, Career Programs Building, and ARCC (staff)
- CBES Wet Labs - non-college employees

Copies of the Hazard Communication Program can be found on the HCC Campus Police and Security webpage. The Director of Public Safety is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary. The Director of Public Safety will work in conjunction with the Director of the Mathematics and Science division to ensure all policies and procedures related to hazardous chemicals are being followed.

## CONTAINER LABELING:

The labeling system used by Hagerstown Community College will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements. All chemicals must be labeled with the contents inside the container. Abbreviations and chemical symbols do not meet the regulations to label the container. Household grade chemicals do not need to be relabeled. The manufacturer's labeling is a sufficient explanation of the hazards of said chemical. The manufacturer is required to provide a label that aligns with the Globally Harmonized System (GHS) for the Classification and Labeling of Chemicals.

The Globally Harmonized System (GHS) for the Classification and Labeling of Chemicals was developed by the United Nations to regulate guidelines worldwide. All primary chemical containers on campus from both manufacturers and distributors must have appropriate GHS labels. The criteria is as follows:

### A. Classification of Hazards

- i. According to the OSHA Hazard Communication Standard, a hazardous chemical is a chemical that meets the definition of a health hazard class, a physical hazard class, a simple asphyxiant, combustible dust, or pyrophoric (spontaneous combustible) gas. The majority of the health and physical hazard classes also include category classifications within each specified class.

### B. Communication of the Hazards

- i. The use of Safety Data Sheets (see Safety Data Sheet (SDS) section below)
- ii. Chemical labeling - There are six different sections that must appear on the GHS compliant label.
  - a. Product Identifiers - Unique names or numbers used on a hazardous product label or in a safety data sheet.
  - b. Signal Words - One word used to indicate the relative level of severity of a hazard and alert the user.
    - “Warning” for less severe hazard categories.
    - “Danger” for more severe hazard categories.
  - c. Hazard Statements - Phrase assigned to each hazard class and category that describes the nature of the hazard.
  - d. Precautionary Statements - Phrases that describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product, or improper storage or handling of a hazardous product.
  - e. Supplier Identification - Must include the name, address, and telephone number of the manufacturer or supplier of the substance.
  - f. Pictograms - A symbol with other graphic elements intended to convey specific health, physical, and environmental hazards of a chemical.

GHS - Hazard Pictograms and Related Hazard Classes		
		
<b>Expanding Bomb</b> • Explosive • Self-reactives • Organic Peroxides	<b>Corrosion</b> • Skin corrosion/burns • Eye damage • Corrosive to metals	<b>Flame Over Circle</b> • Oxidizing gases • Oxidizing liquids • Oxidizing solids
		
<b>Gas Cylinder</b> • Gases under pressure	<b>Environment</b> • Aquatic toxicity	<b>Skull &amp; Crossbones</b> • Acute toxicity (fatal or toxic)
		
<b>Exclamation Mark</b> • Irritant (eye & skin) • Skin sensitizer • Acute toxicity • Narcotic effects • Respiratory tract irritant • Hazardous to ozone layer (non-mandatory)	<b>Health Hazard</b> • Carcinogen • Mutagenicity • Reproductive toxicity • Respiratory sensitizer • Target organ toxicity • Aspiration toxicity	<b>Flame</b> • Flammables • Pyrophorics • Self-heating • Emits flammable gas • Self-reactives • Organic peroxides

The Inventory Clerk at HCC is the department employee that orders and receives chemicals. The Inventory Clerk in each department is responsible for the following:

- Make sure that all chemical containers have clear labels that state the correct hazard warning and lists the manufacturer's name and address.
- 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.
- Review the College's chemical container labeling procedures every year and will update labels as required.

## CHEMICAL STORAGE :

### General Storage Information

1. All chemicals must be properly labeled in storage according to the Chemical Labeling section.
2. Chemicals must be arranged by hazard class. Straying from this requirement may cause other issues, such as an adverse reaction.
3. All caps and lids must be tightly closed
4. Never store chemicals under sinks, with the exception of cleaning chemicals. However, incompatible cleaning chemicals must be separated from one another.
5. Never store chemicals above five feet. Chemicals should be within reach from the ground to prevent accidents from occurring.
6. Throw out any and all expired chemicals.

## **CHEMICAL SAFETY'S ENVIRONMENTAL MANAGEMENT SYSTEM (EMS):**

Chemical Safety is a company that provides an environmental software used to manage chemical inventory and Safety Data Sheet (SDS) on the HCC campus. The EMS is used to track chemicals from delivery to disposal. This EMS will address all of the special issues with storing and using hazardous chemicals. Anyone with access to the campus internet can also view the SDS section of the system via the following link: <https://cloud.chemicalsafety.com/chemsafe/client/WFADBR>. The EMS System is managed by the Director of Public Safety and the Director of Mathematics and Science Division.

If you would like to request login access, submit a request to the Director of Public Safety.

A chemical inventory reconciliation will be completed on an annual basis to ensure updated inventory. Hard copies of SDSs should be maintained, even after the chemical has been used, by Division Directors. SDSs binders can be found inside the respective divisions on campus.

## **SAFETY DATA SHEETS (SDSS):**

Safety Data Sheets (SDS), previously called Material Safety Data Sheets (MSDS), are documents supplied by the manufacturer of the chemical or biological that outline specific details about the chemical and its hazards, such as the reactivity, flammability levels, first aid, storage and spill instructions, and regulatory information. SDSs are available to all employees upon request.

At Hagerstown Community College many different departments on campus utilize hazardous chemicals in the performances of their duties. Hazardous chemicals are used by both faculty and staff on the college campus. It is the responsibility of the Division Directors to ensure that all incoming chemical containers are added to the Environmental Management System. Each division will have an inventory clerk that has access to the Chemical Safety management software to add the necessary information. A list of all the directors and inventory clerks will be updated and maintained by the Director of Public Safety. The procedures below will be followed when an SDS is not received at the time of initial shipment:

- The SDS will be requested by calling, emailing or requesting via the website of the company and or supplier.
- Copies of the SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in paper form by the Division Directors. Those copies should remain in the respective work areas where the chemicals are being used. In addition to this, the SDS can also be found in the Environmental Management System software. A link to this database can be found on the Campus Police and Security webpage.
- SDS will be readily available to all employees during each work shift, if an SDS is not available, contact your Division Director or the Director of Public Safety.

When revised SDSs are received, the following procedure will be followed to replace the old SDSs:

- The respective division directors will ensure the inventory clerk has updated the SDS in the folder and on the Chemical Safety inventory management software.

The SDSs are updated and managed by the office of Director of Public Safety in conjunction with the Director of the Mathematics and Science Division. They will ensure that procedures are developed to obtain the necessary SDSs and all incoming chemical containers are added to the SDS Pro database. If an SDS is not immediately available for a chemical, employees can still obtain the required information by calling the Poison Control Center or 911.

## **EMPLOYEE TRAINING AND INFORMATION:**

The Director of Public Safety is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

All Hagerstown Community College employees who work with or are potentially exposed to hazardous chemicals will receive initial and annual training on the Hazard Communication Standard and this Plan. Training will include the following information:

- An overview of the OSHA Hazard Communication Standard
- Hazardous chemical container labeling, to include the Globally Harmonized System
- Chemical inventory and Safety Data Sheets (SDS)
- Chemical storage guidelines
- Hazardous material entry routes
- Physical and health risks of the hazardous chemicals
- Symptoms and ways to minimize overexposure
- Hierarchy of exposure control methods
- Personal protective equipment (PPE)
- Hazardous Waste and Universal Waste guidelines
- Emergency procedures and spill response

Before bringing a new chemical hazard onto a campus location, each employee in that area will be given information and training for the new chemical hazard. Use of online course management systems to present relevant audiovisuals, videos, and instructional materials. A link to the Hazard Communication Training can also be found on the Campus Police and Security webpage.

## **HAZARDOUS NON-ROUTINE TASKS**

Employees occasionally are required to perform non-routine tasks that are hazardous. Examples of such are: tank cleaning and painting in elevated locations. The employee will be given information by their supervisor about the hazardous chemicals they may encounter during such activity. This information will entail: specific chemical hazards, protective and safety measures the employee should use, and steps the College is taking to reduce the hazards, and emergency procedures.

## **GAS CYLINDER SAFETY**

Gas cylinders are dangerous and can become a hazard if not handled and stored properly. They can cause explosions, fire, and health hazards, and can become projectiles that have the ability to go through walls. The following information will help ensure safe and proper use and storage of gas cylinders:

1. Do not use gas cylinders if you are not familiar with them. Ask your supervisor or a staff or faculty member for assistance.
2. Gas cylinders must always be stored upright and secured with straps or chains connected to a wall bracket or fixed surface, or in suitable racks or cages. A cylinder may not be secured to another cylinder.
3. Separated gas cylinders according to hazard compatibility and stored in cool, dry, well-ventilated areas. A gas cylinder should never be stored or kept in an area that is above 125°F.
4. All gas cylinders must be labeled with the full gas name and have a status usage tag attached, explaining if the cylinder is “full,” “in use,” or “empty.”
5. Read labels and the SDS carefully before using or storing gas cylinders.
6. When a cylinder is empty or not being used, ensure that the valve is closed.

7. Do not store any items on a gas cylinder (i.e. lab coats).
8. Ensure the cap is securely in place to protect the stem when storing or moving a cylinder. (A pressurized cylinder can become a rocket when the stem is broken)
9. Store oxygen cylinders at least 20 feet from flammable or combustible materials, or separate cylinder and materials via a 5-foot, fire-resistant barrier.
10. Always use the correct regulator. Do not use a regulator adaptor.
11. Use an appropriate cart to move cylinders. Never drag or roll a cylinder. Before transporting, close the cylinder valve and screw on the cylinder cap.
12. Do not place cylinders where they may become part of an electric circuit.
13. Gas cylinders may not be transported to or from campus via personal vehicles.

## **PERSONAL PROTECTIVE EQUIPMENT (PPE):**

Proper PPE is required when working with hazardous chemicals, and the kind used depends on the chemical that is being worked with. Examples of PPE may include gloves, safety goggles, Tyvek coveralls, and more. There are also a variety of different types of each category of PPE. For example, nitrile gloves may be used for one type of chemical, but may not be resistant to another and could cause harm to the user. There are also variations on the breakthrough time, or amount of time that PPE can be used before the chemical degrades the material and breaks through to come in contact with the user's skin. The SDS should be consulted to ensure the proper PPE is being used for the specific chemical and to understand the breakthrough time of the PPE being used. Any questions on the selection of proper PPE should be directed to the respective Division Directors.

## **WASTE DISPOSAL:**

The different kinds of waste are hazardous waste, biohazardous waste, universal waste, and nonhazardous waste. Each type is disposed of differently. It is important to be conscious of all types of waste. If you are unsure of how to properly dispose of your waste or have any type of regulated waste that must be picked up for disposal, contact the Director of Mathematics and Science Division. Hagerstown Community College has contracted with an outside vendor that is certified in the removal and/or disposal of hazardous chemicals and/or hazardous waste.

1. **Hazardous Waste:** All hazardous waste must be labeled properly with the contents of the container, the accumulation start date, and the words "Hazardous Waste" clearly written out. Chemical symbols or abbreviations are not permitted when filling in the contents. All hazardous waste containers must be in good condition and placed in secondary containers. Incompatible waste should be segregated by hazard class. Containers must be closed unless waste is being added. If the waste bottle has a hinged lid funnel attached, the funnel must be kept closed unless adding waste to the container. HCC will contract out with a company that is certified to dispose of hazardous waste.
2. **Biological Waste:** Needles, syringes, scalpel blades, razor blades, blood tubes, slides, and other contaminated items that can puncture or pierce a bag must be placed in the red sharps containers. Do not fill the container beyond the designated line on the Sharps container. HCC will contract out with a company that is certified to dispose of Biological waste.
3. **Universal Waste:** Batteries, bulbs, and other mercury containing devices must be disposed of as universal waste.

## **INFORMING OTHER EMPLOYERS/CONTRACTORS:**

It is the responsibility of the Office of the Director of Facilities Management, Planning & Construction to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees. Furthermore, the Director of Facilities Management must obtain information about hazardous chemicals used by other employers to which employees of the College may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by the College's operations in the following manner: access to the College's records in the office of Facilities Management, or the electronic archive of SDS's will be provided to the supervisory point person for any outside contractor upon request to the Director of Facilities Management.

In addition to providing a copy of the SDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by the College. Other employers will be informed of the hazard labels used by the College.

## **EMERGENCY PROCEDURES:**

Emergencies can happen and it is important to understand how to respond appropriately. If you have spill response training for hazardous substances and feel comfortable responding to the incident, follow the training protocols to clean up the spill. If the spill is severe, do not attempt to contain and clean the spill. Regardless, contact Campus Police and Security to alert them of the incident.

Any incident involving a hazardous substance, physical or chemical, mild or severe, to include incidents involving first aid or CPR must be immediately reported to HCC Campus Police and Security and the Office of the Vice President of Finance. The office of the Vice President of Finance will complete all of the necessary paperwork for workplace incident.

1. Campus Police and Security can be reached in the following ways:
  - Pick up any emergency phone located across campus and dial 2308
  - Dial 240-500-2308 from any cellphone or 2308 from any campus landline phone
  - Please dial 911 if the emergency is severe. Be prepared to tell the dispatcher your location and the current situation.
2. The Director of Public Safety's contact information can be found below:  
Chief Eric C. Byers (O) 240-500-2501, Cell 240-675-0619, [ecbyers@hagerstowncc.edu](mailto:ecbyers@hagerstowncc.edu)

## **PROGRAM AVAILABILITY:**

A copy of this plan will be made available, upon request, to employees and their representatives. This plan can also be found on the Campus Police and Security webpage: <https://www.hagerstowncc.edu/hcc-campus-police-security>.