HAGERSTOWN COMMUNITY COLLEGE

HAZARD COMMUNICATION PLAN

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I. INTRODUCTION

Hagerstown Community College is committed to preventing accidents and protecting the health and safety of all employees. The Hazard Communication Plan provides guidance on the identification, classification, and communication of chemical hazards in the workplace. The program includes requirements for employee training, Safety Data Sheets (SDSs), labeling, and other hazard warning methods to ensure employees have the information necessary to work safely with hazardous chemicals.

II. SCOPE

This program applies to all Hagerstown Community College (HCC) personnel who may be exposed to hazardous substances under normal working conditions or during an emergency situation.

The following divisions and departments have been identified as having routine contact with hazardous chemicals and are covered by this program:

- 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

III. REGULATIONS AND GUIDELINES

This written program is intended to comply with the requirements of the federal Occupational Safety and Health Administration (OSHA) Hazard Communication (29 CFR 1910.1200). This standard is enforced by the state of Maryland through the Access to Information about Hazardous and Toxic Substances Act.

IV. DEFINITIONS

The definitions contained in this program are based on OSHA's Hazard Communication Standard, 29 CFR 1910.1200(c), and are used for the purposes of administering this Hazard Communication Program

Chemical: Any substance, or mixture of substances

Chemical name: The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name that will clearly identify the chemical for the purpose of conducting a hazard classification.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like that contains a hazardous chemical.

Exposure: An employee is subjected in the course of employment to a chemical that is a physical or health hazard and includes potential (e.g. accidental or possible) exposure.

Hazard Class: The nature of the physical or health hazards, e.g. flammable solid, carcinogen, oral acute toxicity.

Hazard Statements: A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

Hazardous Chemical: Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas or hazard not otherwise classified.

Health Hazard: A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Label Elements: The specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.

Pictogram: A composition that may include a symbol plus other graphic elements such as a border, background pattern or color that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated for application to a hazard category. See Appendix A for specific pictograms.

Physical Hazard: means a chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

Precautionary Statement: A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage of handling.

Product Identifier: The name or number used for a hazardous chemical on a label and in the SDS. It provides a unique means by which the chemical can be identified.

Safety Data Sheet (SDS): Written or printed material concerning a hazardous chemical that is prepared in accordance with the OSHA Hazard Communication Standard. Formerly known as a Material Safety Data Sheet.

Signal Word: A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are "danger" and "warning." "Danger is used for the more severe hazards, while "warning" is used for the less severe.

Work area: A room or defined space in a work area where hazardous chemicals are produced or used, and where employees are present.

V. RESPONSIBILITIES

The Department of Public Safety & Environment, Health, and Safety (EHS) Coordinator

The EHS Coordinator is responsible for administering the Hazard Communication Program and has the following responsibilities:

- Providing oversight for the College's Hazard Communication Program and chemical safety management initiatives.
- Establishing, implementing, and maintaining institutional policies and procedures governing the storage, handling, use, and disposal of hazardous chemicals.
- Ensuring compliance with applicable Occupational Health and Safety (OSHA) Hazard Communication requirements and other relevant regulatory standards.
- Providing technical guidance and consultation to departments on chemical hazard identification, risk assessment, exposure control measures, waste management requirements, and safe work practices to ensure regulatory compliance and minimize risk.

- Developing Job Hazard Analyses (JHAs) that identify hazards, required safeguards, safe chemical handling practices, and appropriate PPE.
- Ensuring Hazard Communication training and associated educational resources are developed, delivered, and maintained for affected employees in accordance with regulatory requirements.
- Monitoring program effectiveness through inspections, audits, incident reviews, and continuous improvement initiatives.

Division Directors and Supervisors

Division Directors and Supervisors are responsible for:

- Identifying and assessing hazardous chemicals used within their department or work area.
- Assigning a department inventory clerk, when applicable, to maintain chemical inventory records, update additions and deletions of hazardous chemicals, and assist with annual inventory reviews.
- Ensuring employees have immediate access to SDSs during their work shift.
- Reviewing chemical hazards and safe handling procedures with employees.
- Determining and implementing appropriate engineering controls, administrative controls, safe work practices, and personal protective equipment (PPE) requirements. The EHS Coordinator may be consulted for assistance.
- Ensuring all chemical containers, storage areas, and workspaces are properly labeled.
- Providing Hazard Communication training to employees and other affected individuals, including information on chemical hazards, labeling, and SDSs.
- Supporting the development and implementation of Job Hazard Analyses (JHAs) and other risk management processes involving hazardous materials.
- Providing appropriate PPE and ensuring its proper use when required.
- Retraining employees whenever new chemicals, hazards, equipment, or work procedures are introduced.
- Informing contractors of chemical hazards and required safety precautions within their work areas.

Inventory Clerk

The Inventory Clerk, or designated department employee responsible for ordering and receiving chemicals, is responsible for:

- Maintaining and updating required chemical inventory records, including binders and CampusOptics.
- Ensuring that all chemical containers have clear labels that state the product identifier, appropriate hazard warnings, and manufacturer information.
- Ensuring that all secondary containers are labeled with either the original manufacturer's label or an approved workplace label that identifies the chemical and communicates the appropriate hazard information.
- Reviewing the College's chemical container labeling procedures annually and updating or replacing labels as necessary to maintain compliance.

Employees

Employees are responsible for:

- Knowing the chemicals you are working with and the potential hazards; reading safety data sheets (SDSs).
- Taking Hazard Communication training and obtaining chemical-specific training from your supervisor.

- Knowing where to find SDS binder.
- Following a standard operating procedure (SOP) and/or a job hazard analysis (JHA) developed for operations in your work area that describe hazards and safeguards.
- Following safe use practices when working with chemicals, including engineering controls, administrative controls, good work practices and use of proper personal protective equipment (PPE) as required.
- Helping your supervisor ensure all chemical containers are labeled.
- Follow manufacturer's recommendations for safe use, storage, and disposal of all hazardous products.
- Knowing what to do for a chemical spill.
- Asking questions if you are unsure about any procedures or chemical hazards.
- Reporting any accidents or injuries immediately to your supervisor.

Contractors & visitors

The Director of Facilities Management is responsible for communicating hazard information to contractors and other employers whose employees may be exposed to hazardous chemicals while working on College property. This includes obtaining information about hazardous chemicals used by contractors that may expose College employees.

Contractors and other employees will be responsible for:

- Asking about chemicals and potential hazards they may encounter in the work area where they will work or visit.
- Following proper procedures of the work area and wearing personal protective equipment as needed.

VI. TRAINING

The EHS Coordinator is responsible for administering the Hazard Communication Program and ensuring that all required training elements are implemented and maintained.

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. Additional training will be provided whenever a new chemical hazard is introduced into the workplace. 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 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

All related training will be documented with the employee's name and date. Training records will be maintained in the College's online training management system and made available upon request for regulatory review or compliance audits.

VII. HAZARDOUS NON-ROUTINE TASKS

Employees are occasionally 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.

VIII. CONTAINER LABELING

OSHA requires that manufacturers, distributors, employers, and employees observe specific requirements for container labeling and posting warning signage.

Manufacturer's Container Labels

All containers delivered to HCC that contain hazardous chemicals should be labeled and marked with the manufacturer's labels and warnings. Manufacturer's labels and warnings must contain signal words, hazard statements, precautionary statements, pictograms, product identification, and supplier identification.

Under no conditions may the manufacturer's label be defaced, removed, covered up, or otherwise obstructed so long as the container contains the corresponding hazardous chemical. Once the container is empty, the label should be removed or otherwise obstructed to prevent the false representation of a hazard.

Secondary Container Labeling

Hazardous chemicals should remain in the manufacturer's container throughout the use of that container. However, if this is not feasible and the hazardous chemical must be transferred to another container, or if one or more hazardous chemicals are mixed in a container, the container must be labeled with the following:

- Complete chemical name, trade name, or common name found on the SDS (abbreviations and chemical symbols do not meet the regulations to label the container.
- The chemical name written in English and clearly legible.
- Appropriate hazard warning, or alternatively, words, pictures, symbols, or combination thereof which provides at least general information regarding the hazards of the chemicals.
- If an employee who is expected to use the hazardous chemical does not speak English, additional labels must be provided in the appropriate language that accurately reflects the hazards associated with the chemical.

All chemical containers must have a label attached to them that communicates the hazards of that chemical to the user.

IX. 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. Dispose of any and all expired chemicals.

X. SAFETY DATA SHEETS (SDS)

Safety Data Sheets (SDS), formerly known as Material Safety Data Sheets (MSDS), are documents supplied by the manufacturer that outline specific details about the chemical and its hazards, including physical and health hazards, reactivity, flammability, safe handling practices, storage requirements, spill response procedures, first aid measures, and regulatory information. SDSs are available to all employees upon request.

Hagerstown Community College utilizes CampusOptics, an EH&S management platform administered by the EHS Coordinator, to maintain chemical inventories and SDS records. CampusOptics is used to track chemicals from receipt through disposal and provides information necessary for the safe storage and use of hazardous chemicals. Individuals requiring system access may request it through the EHS Coordinator. Chemical inventory and SDS information are also available through CampusOptics and the College's website.

Each division is responsible for maintaining SDSs for all chemicals currently in use and ensuring that employees have immediate access to them. Hard-copy SDS binders shall be maintained within each division. Obsolete SDSs, including those for chemicals that are no longer used, shall be retained for a minimum of 30 years in accordance with recordkeeping requirements.

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.

XI. 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.

XII. EXPOSURE CONTROL

Each division is expected to implement engineering controls and administrative controls before relying upon PPE to protect employees from exposure to hazardous chemicals.

Engineering Controls

Engineering controls are physical or mechanical measures designed to eliminate or reduce employee exposure to hazardous chemicals at the source. Examples include local exhaust ventilation, chemical fume hoods, machine guards, enclosed processes, and automated safety equipment. Engineering controls will be used whenever possible to reduce exposure to hazardous chemicals.

Administrative Controls

Administrative controls are management-directed work practices and procedures intended to reduce the frequency, duration, or severity of employee exposure to hazardous chemicals. Examples include written safety procedures, employee training, supervision, job rotation, restricted access to hazardous areas, and safe work practices.

Personal Protective Equi[ment (PPE):

Personal protective equipment (PPE) serves as the last line of defense when engineering and administrative controls do not adequately eliminate or reduce exposure to hazardous chemicals. PPE may include, but is not limited to, safety glasses, chemical splash goggles, face shields, gloves, protective clothing, lab coats, and respiratory protection. Any employee expected to work with hazardous chemicals must review the SDS to determine what PPE is required to be worn. Supervisors are responsible for evaluating routine and non-routine work activities, ensuring appropriate PPE is provided, and verifying that employees are trained in its proper use, care, and maintenance.

XIII. 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 Environmental Health and Safety Coordinator. 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.

Refer to COMAR 26.13.01 for more information.

XIX. 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. Call 911 and when safe to do so, contact HCC Police and Security to alert them of the incident. Report all incidents to HCC Police.

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 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. HCC 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. BTC security
   - Dial 240-500-2508 from any cell phone or 2508 from any campus landline phone.
3. The Director of Public Safety's contact information can be found below:
   Chief Eric C. Byers
   Office: 240-500-2501
   Cell: 240-675-0619
   Email: ecbyers@hagerstowncc.edu

XX. 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 HCC Environmental Health & Safety webpage.