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:	May 27, 2025
Adopted:	March 3, 1994

I. PURPOSE:

Hazard Communication Program planning informs students and employees of the risk of hazardous materials with which they work or study, of safe handling procedures and of measures to take to protect them from hazardous materials. Each technical college or work unit shall develop, review, and submit, at least annually, a Hazard Communication Program Plan (HCPP) to the TCSG System Office. The HCPP will inform students and 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, those materials, which may present physical and/or health hazard concerns. The President/Executive is directly responsible for the implementation of this procedure and shall provide sufficient resources, personnel, and administrative support to accomplish this end.

II. RELATED AUTHORITY:

Occupational Safety and Health Administration (OSHA) Hazard Communications Standard 29 CFR 1910.1200

Occupational Safety and Health Standards Standard Number: 1910.133 Subpart:1910 Subpart I Subpart Title: Personal Protective Equipment. Title: Eye and face protection.

Occupational Safety and Health Standards Standard Number: 1910.134 Subpart:1910 Subpart I Subpart Title: Personal Protective Equipment Title: Respiratory protection.

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

Georgia Public Employee Hazardous Chemicals Protection and Right to Know Rules, 300-3-19-01 et seq.

III. APPLICABILITY:

All Technical Colleges and work units (where applicable) 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 with the goal of reducing the duration, frequency, and severity of exposure to hazards or situations.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank containing a hazardous material.

Covered: Covered individuals are identified by the technical college or work unit as those students or employees 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 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.

Engineering Controls: Those methods or equipment 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 standardizes and harmonizes the classification and labeling of materials. GHS defines health, physical and environmental hazards of materials; classifies processes that use available data on materials for comparison with defined hazard criteria; and communicate hazard information and 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 (HCS) 2012: The HCS (or Employee Right to Know law) promulgated by the Office of Occupational Safety and Health Administration (OSHA) ensures hazards of workplace materials are evaluated and information on the hazards is provided to employers and covered students and covered employees.

Health Hazard: A material 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: Written, printed or graphic information elements concerning a hazardous material and is affixed to, printed on, or attached to the immediate container of a hazardous material, or to the outside packaging.

Occupational Exposure: Exposure through any route of entry (*e.g.,* inhalation, ingestion, skin contact or absorption) to potentially harmful hazardous material that occurs in the performance of covered student's or covered employee's occupational tasks. Occupational exposure occur in many different settings, including an instructional laboratory activity, a clinical rotation or other work site.

Personal Protective Equipment (PPE): Protective clothing, helmets, gloves, face shields, goggles, facemasks and/or respirators or other equipment designed to protect the wearer from injury or the spread of infection or illness.

Physical Hazard: A material 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 when contact with water emits flammable gas.

Safety Data Sheet (SDS): Written or printed material concerning a hazardous material prepared in accordance with 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. These standard precautions include adhering to appropriate prescribed engineering and administrative controls, personal protective equipment, housekeeping, and laundry.

V. ATTACHMENTS:

A. Attachment 7.2.1p4.a1. TCSG Hazard Communication Program/Right to Know Plan (HCPP) Template
B. Attachment 7.2.1p4.a2. Exposure Incident Report and Follow-Up Form for Exposure to Hazardous Materials
C. Attachment 7.2.1p4.a3. Hazard Communication Program Planning Resources

VI. PROCEDURE:

A. The President/Executive shall be directly responsible for the implementation of this procedure and shall provide sufficient resources, personnel, and administrative support to accomplish this end.
B. Each technical college or work unit shall develop and implement a Hazard Communication Program Plan (HCPP) to address measures to protect and appropriately train covered students and covered employees working in contact with or in proximity to hazardous materials at primary work sites/campus locations, satellite locations and off-campus sites.
C. The President/Executive of the technical college or work unit shall assign a single individual to serve as the Hazard Communication Program Plan/Right to Know (HCP/RTK) Coordinator to monitor compliance, hazardous material safety practices, incidents, and applicable training. The HCP/RTK Coordinator should hold professional credentials and expertise with

regard to occupational safety and hazard communication in the workplace, Incident Command System (ICS) and National Incident Command System (NIMS).

D. The HCPP shall be maintained, reviewed, exercised, and updated at least annually to ensure compliance and protection for covered students and covered employees by the technical college or work unit with regard to 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 to the TCSG System Office for review no later than June 30 and December 31 of each calendar year. Hazardous Material Inventories should, at minimum, include notations of the following for each product: product name; manufacturer; date added &/or revised; location identifier.
F. The technical college or work unit shall document and implement protocols according to its HCPP for the containment, labeling, storage, and disposal/removal of hazardous materials.
G. An information poster describing rights under O.C.G.A. §45-22-1 to §45-22-12 shall be posted in all appropriate settings in a prominent manner so that it is routinely visible to all students and employees. For those workplaces in geographically dispersed work areas, a poster shall be placed in each work area.
H. The HCP/RTK Coordinator shall monitor training in the area of hazardous materials for all covered students and covered employees who are at risk for exposure. Training is required prior to 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 experience with periodic retraining if indicated. The HCP/RTK Coordinator shall maintain a master training log of all associated training activities. 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. The technical college or work unit shall provide appropriate personal protective equipment (PPE) at no cost for covered employees as required in each workplace environment and shall provide training to covered employees on the use and maintenance of this equipment. Covered students shall be provided with similar training regarding PPE; PPE may be made available at the expense to the student.
J. All hazardous materials introduced into technical college or work unit educational or workplace environments for use by covered students or covered employees shall be stored in labeled containers that meet the standards of the Occupational Safety and Health Administration.
K. The TCSG System Office shall provide technical assistance to support the development and implementation of hazardous communication program planning as well as for execution of training, drills, and exercises.
L. Technical colleges or work units shall approve and submit the reviewed HCPP to the TCSG System Office on or before May 1 of each calendar year for periodic assessment.

VII. RECORD RETENTION:

HCPPs and supporting documentation shall be retained for a period of three years. Required confidential medical records of covered students and covered employees must be retained for the duration of employment or attendance plus 30 years. Training records of covered students and covered employees and corresponding master training logs must be retained for a three-

year period. An Exposure Log must be retained for at least five years following the end of the calendar year covered.

Attachment 7.2.1p4.a1. TCSG Hazard Communication Program/Right to Know Plan (HCPP) Template

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

REVIEWED: _____ **DATE:** _____
HAZARD COMMUNICATION PROGRAM COORDINATOR
{Technical College or Work Unit Name}

APPROVED: _____ **DATE:** _____
PRESIDENT/EXECUTIVE
{Technical College or Work Unit Name}

REVIEWED: _____ **DATE:** _____
EMERGENCY MANAGER
TECHNICAL COLLEGE SYSTEM OF GEORGIA

APPROVED: _____ **DATE:** _____
DIRECTOR OF PUBLIC SAFTEY
TECHNICAL COLLEGE SYSTEM OF GEORGIA

Hazard Communication Program 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. 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 students and employees.

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, has the overall responsibility for the Hazard Communication Program. The HCP/RTK Coordinator will review and update and then subsequently submit the HCPP to the TCSG System Office annually, or more frequently if necessary to reflect any new or modified tasks or activities; new or revised employee classifications or new instructional programs with potential injurious exposure to hazardous materials to ensure compliance and protection for all individuals.

Contact Information for HCP/RTK Coordinator

_____
_____
_____
_____

B. Those individuals who are determined to be at risk of exposure to hazardous materials must comply with the procedures and practices outlined in this HCPP.

C. The assigned designees listed below are responsible for the implementation, documentation, review, training, and record keeping with respect to the areas of implementation of methods of exposure control, container labeling, safety data sheets, training, and information. Further, adequate supplies of the aforementioned equipment will be available in the appropriate sizes/fit. {*May be detailed in an appended document. Include: Contact Information for Responsible Person(s) or Department(s) as well as a list of job and/or student program classifications which 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 students or employees who are at risk or

vulnerable in the normal conduct of their tasks or activities for potentially injurious exposure to hazardous materials. A “covered” occupational task or activity is recognized as one in which risk of exposure is reasonably expected. These individuals include students as well as part-time, temporary, contract, and per-diem employees.

III. IMPLEMENTATION OF METHODS TO REDUCE EXPOSURE RISK

The individuals identified in I. C. are responsible for implementing and documenting the following methods to reduce exposure risk:

A. Standard Precautions: All covered individuals will use hazardous materials standard precautions as dictated by the task or activity. These standard precautions include adhering to appropriate prescribed engineering and administrative controls, personal protective equipment, housekeeping, and laundry.

B. Personal Protective Equipment:

1. Appropriate personal protective equipment (PPE), including but not limited to: respiratory, gloves, protective clothing, eye, and face protection, is provided to covered employees at no cost and available to covered students at the students’ expense.
2. Training/record keeping in the use of PPE for specific tasks is provided and maintained.
3. Adequate supplies of the aforementioned equipment will be available in the appropriate size/fit.
4. All covered employees and covered students using PPE must observe the following precautions:
    a. Wear appropriate PPE when it is reasonably anticipated that there may be contact with hazardous materials; replace gloves or other protective clothing if torn or punctured, or if their ability to function as a barrier is compromised.
    b. Utility gloves or other protective clothing may be reused if their integrity is not compromised. Utility gloves or other protective clothing should be discarded if they show signs of cracking, peeling, tearing, puncturing or deterioration.
    c. Appropriate face and eye protection should be donned when splashes, sprays, spatters, or droplets of hazardous material pose 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 discarded properly after each use.

IV. CONTAINER LABELING

A. The HCP/RTK Coordinator will review labeling procedures periodically and will update labels as required. *{Describe process here; 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 all containers received for use are clearly labeled as to contents, appropriate hazard warning (both physical and health) and manufacturer's name and address.
2. Defaced or missing labels are replaced quickly with an appropriate secondary label.
3. All secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning(s). For assistance with labeling, contact the HCP/RTK Coordinator.
4. Additional secondary labeling methods used by the technical college/work unit are described here: *{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.}*

V. 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 for the review of incoming SDSs for new or significant health and safety information. Any new information is communicated to affected students or employees. An alternate procedure will be followed when an SDS is not received at the time of initial shipment: {*Describe 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 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. 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 use of control procedures, administrative practices, and personal protective equipment
- steps taken to reduce or prevent exposure to hazardous materials
- procedures to follow if covered individuals are overexposed to hazardous materials
- how to read labels and SDSs to obtain hazard information
- location(s) of the SDSs and written Hazard Communication Program Plan

3. Prior to introducing a new hazard into any organizational unit, each covered individual in that organizational unit will be given information and training as outlined above for the new hazard. The training format will be as follows: *{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 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/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 students/employees may be exposed to on a given technical college/work unit site as well as suggested precautions for those students/employees. The HCP/RTK Coordinator is also responsible for obtaining information about hazardous materials used by other employers to which students/employees 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 students/employees 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. If symbolic or numerical labeling systems are used, the other students/employees will be provided with information to understand the labels used for hazardous materials for which their students/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, can be included.

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: *(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 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 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:
   2. Document the routes of exposure and how the exposure occurred.
C. During the period of the *{insert the previous academic year}* HCPP the following incidents surrounding exposure occurred. *{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. task being performed when the incident occurred;
   7. training records of 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 an evaluation of safer practices, review of 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

Prior to 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 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 _____. If requested, a hard copy of this HCPP will be provided free of charge within 3 business days of request. Copies of the Hazard Communication Program Plan are available _____ for review by any interested individuals.
B. A copy of this program will be made available, upon request, to students, to employees, and their representatives. *{Describe the methods by which the program is made available and identify the individual to whom this responsibility falls.]*

Attachment 7.2.1p4.a2. Exposure Incident Report and Follow-Up Form for Exposure to Hazardous Materials

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

INCIDENT REPORT

Date of report: _____

Name of person exposed:_____

Employee Number or Student Number:_____

If Student:
Program/Course:_____

If Employee: Job Title:_____

Location of incident:_____

Date and time of incident:_____

Describe circumstances of exposure incident or attach report:

_____
_____
_____
_____
_____
_____

FOLLOW-UP

- ☐ Person involved in incident referred to appropriate health care professional for follow-up.
- ☐ Documentation of medical release is on file at work unit or technical college and clinical or work site (if appropriate). Alternate employment duties/academic activities assignment 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 person preparing Exposure Incident Report and Follow-up Form:

_____ _____

(Printed) (Signature)

Attachment 7.2.1p4.a3. Hazard Communication Program Planning Resources

Occupational Safety and Health Administration (OSHA) Hazard Communication Standard 29 CFR 1910.1200 available at

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.