ATHENS TECHNICAL COLLEGE

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ATHENS - ELBERT - WALTON

Hazard Communication Program Plan 2024 - 2025

The following Hazard Communication Program Plan has been established to inform employees and students of the hazardous properties of chemicals with which they work or study, of safe handling procedures and of measures to take to protect employees and students from these chemicals.

Submitted By:

Scott Anderson
Executive Director of Facilities

ATHENS TECHNICAL COLLEGE

HAZARD COMMUNICATION PROGRAM PLAN

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Hazard Communication Program Plan
Athens Technical College
2024-2025

REVIEWED: _____ DATE: 4/10/24
HAZARD COMMUNICATION PROGRAM COORDINATOR
ATHENS TECHNICAL COLLEGE

APPROVED: _____ DATE: 4/17/2024
PRESIDENT/EXECUTIVE
ATHENS TECHNICAL COLLEGE

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

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

ATHENS TECHNICAL COLLEGE

HAZARD COMMUNICATION PROGRAM PLAN

INTRODUCTION

The State Board of the Technical College System of Georgia (SBTCSG), along with its technical colleges and work units, is committed to providing a safe and healthful environment for its employees, students, volunteers, visitors, vendors and contractors. SBTCSG Policy II.D. Emergency Preparedness, Health, Safety and Security compels technical colleges and work units to ensure that information about the dangers of all hazardous materials used are known by all affected individuals. This Hazard Communication Program Plan (HCPP) is established to prevent the potentially injurious exposure to hazardous materials through the improper use, handling, transportation, containment, storage, or disposal of such materials under normal operating conditions or potentially during an emergency situation. This HCPP provides guidance for training regarding the contents of the Occupational Safety and Health Administration (OSHA) Hazard Communications Standard, 29 CFR 1910.1200 (along with the Georgia Public Employee Hazardous Chemical Protection and Right to Know Act of 1988 O.C.G.A. §45-22-1 to §45-22-12 as well as the Georgia Public Employee Hazardous Chemicals Protection and Right to Know Rules, 300-3-19-01 et seq. To this end, the HCPP is maintained, reviewed, exercised and updated at least annually to ensure compliance and protection for employees and students.

This Hazard Communication Program Plan includes the following topics:

- program administration
- exposure determination
- implementation of methods of exposure control
    - 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 academic programs with potential injurious exposure to hazardous materials to ensure compliance and protection for all individuals.

HCCP 1.A Program Administration				
	Responsible Authority	**Office Number**	**Cell Number**	**Email**
HCP/RTK Coordinator	Scott Anderson	706-355-5120	706-612-7595	sanderson@athenstech.edu
Assistant HCP/RTK Coordinator	John Echols	706-355-5120	706-612-1969	jechols@athenstech.edu

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.

Job/Program Classification	Responsible Authority
ATC College Coordinator	Scott Anderson
Elbert Campus Coordinator	Al McCall
Walton Campus Coordinator	Jeffrey Fletcher
Adult Education Coordinator	Fabersha Flynt
Dean of Business, Education, Technology & Manufacturing	Christina Wolfe
Dean of Health & Life Science	Stuart Frew
Dean of General Education & Online Learning	Shawana Stanford
Chief of Police	John Gaissert
Exec Director of Facilities	Scott Anderson
PC Agriculture Science	Dr. Chris Morgan
PC Air Conditioning Technology	Coleman Simmons
PC Automotive Collision	Greg Thomas
PC Automotive Technology	Arlen Hart
PC Commercial Truck Driving	Billy Byrd
PC Cosmetology	Teresa Bowles
PC Dental Assisting	Jennifer Burrell
PC Diesel Technology	Charles Dawson
PC Engineering Technology	Aaron Watwood
PC Nursing	Andraa Perrin
PC Paramedicine	Don Pruitt
PC Radiology	Amanda Stanley

PC Surgery Technology	Denelle White
PC Veterinary Technology	Dr. Lara Vaughn
PC Welding Technology	Billy Moyers

D. Athens Technical College engages in the following contractual agreements regarding hazardous materials communication:

1. Safety Clean
2. Viola
3. Branch Environmental

E. Athens Technical College engages in the following training, drills and exercises. The Athens Technical College Police Department provides training each year that specifically includes the Hazardous Communications Plan. The Police Department has conducted drills and multi-discipline training exercises and staff development training in 2023 on all four Athens Technical College Campuses that included the Hazardous Communication Plan. In addition to this training, Athens Technical College Police conducted a Tornado Drill, Active Shooter Training, Fire Drill and Evacuation Drill on all four campuses. The protocol for the retention of training records is that Staff Development is set up on the College intranet that is accessed from the College website. The records are stored and maintained by the Dean of Dean of Academic Technology. The Human Resources Department also requires annual training on Hazardous Material for all Staff and Faculty. All Records are kept on file for three years.

F. The protocol for the annual review of the Athens Technical College HCPP is that the Chief of Police and the Executive Director of Facilities reviews the HCPP plan and makes any needed adjustments or additions to the plan. Once the review is complete the Plan is reviewed by the College President and submitted to the Emergency Manager at TCSG by May 1st of each year. The protocol for the retention of the HCPP is that all Emergency Plans including the Hazardous Communications Plan is three years. The Plans will be stored on the College Intranet and the Chief of Police will retain a copy of the plan at the Police Department Headquarters for three years as well.

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 work unit or technical college as those employees or students who are at risk or vulnerable in the normal conduct of their tasks or activities for potentially injurious exposure to hazardous materials. A "covered" occupational task or activity is recognized as one in which risk of exposure is reasonably expected. These individuals include part-time, temporary, contract, and per-diem employees.

The following is a list of student program classifications that present the opportunity for potentially injurious exposure to hazardous materials.

Programs

- Agricultural Science
- Air Conditioning Technology
- Automotive Collision Repair
- Automotive Technology
- Commercial Truck Driving
- Cosmetology
- Dental Assisting
- Diesel Equipment Technology
- Engineering Technology
- Nursing
- Paramedicine
- Radiological Technology
- Surgery Technology
- Veterinary Technology
- Welding Technology

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 student's expense.
2. Training/record keeping in the use of PPE for specific tasks is provided and maintained.
3. Adequate supplies of the aforementioned equipment will be available in the appropriate size/fit.
4. All covered employees and covered students using PPE must observe the following precautions:
   - **a.** Wear appropriate PPE when it is reasonably anticipated that there may be contact with hazardous materials; replace gloves or other protective clothing if torn or punctured, or if their ability to function as a barrier is compromised.
   - **b.** Utility gloves or other protective clothing may be reused if their integrity is not compromised. Utility gloves or other protective clothing should be discarded if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
   - **c.** Appropriate face and eye protection should be donned when splashes, sprays, spatters, or droplets of hazardous material pose as risk to the eye, nose, or mouth.
   - **d.** Respiratory protection devices should be donned when the vapors of fumes pose a risk to the respiratory system.
   - **e.** Disposable PPE should be discarded properly after each use.

IV. CONTAINER LABELING

A. The **HCP/RTK Coordinator** will review labeling procedures periodically and will update labels as required.

B. **Program Chairs** will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address.

C. The **Program Chair/Instructor** in each section will 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. For help with labeling, see your **Program Chair.** On the following individual stationary process containers (such as storage tanks), we are using **signs, placards, or other written materials** rather than a label to convey the required information:

D. 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: 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: Mark the container with the following minimum information taken directly from the label and/or MSDS:

    - Product Name
    - Manufacturer
    - Location of SDS
    - Any applicable warnings
    - Emergency Medical Phone Number

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: On such containers, Athens Technical College uses signs, placards, process sheets, batch tickets, operating procedures, or other such written materials, rather than a label to convey the required information:

6. Athens Technical College does not use an in-house labeling system.

V. SAFETY DATA SHEETS

A. The HCP/RTK Coordinator, Scott Anderson, Executive Director of Facilities, is responsible for establishing and monitoring the technical college or work unit SDS program.

B. The individuals identified in I. C. along with Program Chairs 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 employees. An alternate procedure will be followed when an SDS is not received at the time of initial shipment:

- **Program Chair** will contact the manufacturer and request that a SDS be provided.
- **Program Chair** will notify employees/students about products that there are no MSDS for and prohibit their use until such time an SDS is obtained.

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. Copies will be kept in Program Chairs office and a copy will be forwarded to Scott Anderson, Executive Director of Facilities. If an SDS is not available, contact **Scott Anderson, Executive Director of Facilities.**

3. SDSs will be readily available to covered individuals in each work area using the following format:

- If an SDS is not available, contact the Program Chair. If the Program Chair is unavailable the employee may contact Scott Anderson, Executive Director of Facilities for copies of the SDS..

4. When revised SDSs are received, the following procedures will be followed to replace old SDSs:

- **Program Chairs** shall review all newly received SDS for changes and replace existing MSDS in their binder.
- **Program Chairs** will provide any new copies of SDS to the Executive Director of Facilities for the Campus binder.
- **Program Chairs** will notify Scott Anderson, Executive Director of Facilities of any changes, additions, or deletions within three business days.

VI. TRAINING AND INFORMATION

A.The HCP/RTK Coordinator is responsible for the HCCP training and will ensure that all program elements are carried out. The HCP/RTK Coordinator is responsible for maintaining the Master Training Log.

B. The individuals identified in I. C. and Program Chairs 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. Everyone who works with or is 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 employee in that organizational unit will be given information and training as outlined above for the new hazard. The training format will be as follows:

- **Each newly hired employee shall take the online interactive Hazardous Material Training on the Athens Technical College intranet. All employees will take the online interactive Hazardous Material Training annually as a refresher.**

VII. HAZARDOUS NON-ROUTINE TASKS

Periodically, covered individuals are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting such tasks, each affected covered individual will be given information by the individuals identified in I. C. for their respective organizational area about the hazardous materials which may be encountered. This information includes specific chemical hazards, protective/safety measures, and steps being taken to reduce hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

Examples of non-routine tasks performed by covered individuals of the company are:

Task	Hazardous Material
Housekeeping	**Rigging**
Keep work area and access clear	Inspect rigging before each use
Clean work area daily	Do not work under suspended load
	Proper use of tagline/positioning pole
Fall Protection	Do not exceed load limits
	Check tags and chokers for load limits
100% Tie off, where fall hazard exist	
Lifeline installed	**Confined Space**
Full body harness/lanyard	
Equipment inspected before use	All employees trained
Lifting	**Lockout / Tag Out**
Lift with legs and back straight	Make sure equipment is properly locked out
Get help with heavy loads	Drained, vented and energy released
Use material handling equipment	Proper documentation completed
Ladders	**Power / Hand Tools**
Tie off ladder using 4 to 1 rule	Use guards and handles
Face ladder when climbing	Wear eye/ear protection as required
Use both hands when climbing (3 Point Rule)	GFIC or double insolated cords/tools
Extend ladder 36” above landing	Unplug tools not in use
Use hand line to raise and lower tools	Proper tool for job
One employee on ladder at a time	Inspect tool prior to use

Guarding / Pinch Points

Wear Gloves when required
Be aware of swing radius of machinery
Proper use of guards
Star up horns and emergency stop cords

Personal Protective Equipment

Hard Hat, Safety Glasses, and steel toed boots
Proper Gloves, when required
Hearing and Eye protection, when required
Respirator / Dusk Mask, when required
Googles / Face Shield, when required

Welding / Burning

Wear gloves and protective clothing
Use cutting goggles
Use and inspect fire extinguishers
Ground welding machine
Post "Hot Work" permits as required
Move or cover combustibles
Leads inspected prior to use for damage

VIII. INFORMING OTHER EMPLOYERS/CONTRACTORS

A. The HCP/RTK Coordinator is responsible for providing other employers and contractors with information about hazardous materials that their employees may be exposed to on a given work unit/technical college site as well as suggested precautions for those employees. The HCP/RTK Coordinator is also responsible for obtaining information about hazardous materials used by other employers to which employees of the work unit or technical college may be exposed.

B. Other employers and contractors will be provided with SDSs for hazardous materials generated by the operations of the work unit or technical college in the following manner:

- **All other employers or contractors shall check in with Executive Director of Facilities before performing any task on campus to ensure that all hazards are addressed.**
- **Program Chairs/Instructors will notify the Exec Director of Facilities of any pending visits by other employers or contractors**

C. In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by the work unit or technical college.

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 employees will be provided with information to understand the labels used for hazardous materials for which their employees may have exposure.

IX. HAZARDOUS MATERIAL INVENTORIES

A. A biennial inventory of all known hazardous materials used by covered individuals is associated with this HCPP. This inventory includes the name of the chemical, the manufacturer, the work/study area in which the material is used, and quantity if it exceeds the Threshold Planning Quantity (TPQ). The inventory should be arranged to be able to cross-reference it with the SDS file and the labels on containers. Additional useful information, such as the manufacturer's telephone number, and emergency number, scientific name, CAS number, the associated task, tec., can be included. ((See these links for further information on TPQ:
http://www.gpo.gov/fdsys/pkg/CFR-2013-title40-vol29/pdf/CFR-2013-title40-vol29-part355-appB.pdf

http://www.gpo.gov/fdsys/pkg/CFR-2013-title40-vol29/pdf/CFR-2013-title40-vol29-part355-appA.pdf))

B. When new materials are received, the inventory is updated (including date the materials were introduced) within three (3) business days. To ensure any new material is added in a timely manner, the following procedures shall be followed:

- Shipping and Receiving shall provide the Executive Director of Facilities copies of SDS that arrive with a shipment.
- Executive Director of Facilities will update the Campus Binder with any changes, additions, or deletions immediately upon receipt or within three business days.
- Program Chairs will update their Program Binder with any changes, additions, or deletions immediately upon receipt or within three business days.
- Program Chairs will notify their Program Hazcom Coordinator of any changes, additions, or deletions immediately upon receipt.
- Program Hazcom Coordinators will provide a list of changes, additions, or deletions semiannually (Dec/Jun) to the Exec Director of Facilities.
- Exec Director of Facilities will submit a master list of changes, additions, or deletions semiannually (Jan/Jul) to TCSG

C. The Hazardous Material Inventory is compiled and maintained and submitted to the TCSG System Office by Scott Anderson, Executive Director of Facilities.

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

A. Scott Anderson, Executive Director of Facilities 706-355-5120 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 Scott Anderson, Executive Director of Facilities will ensure that appropriate changes are made. (Changes may include an evaluation of safer practices, review of training etc.)

C. During the period of the 2023-2024 ECP the following incidents surrounding exposure occurred. No reports of exposure were reported at Athens Technical College.

XI. EVALUATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS

A. Scott Anderson, Executive Director of Facilities will review the circumstances of all exposure incidents to determine:

1. engineering controls in use at the time
2. administrative practices followed
3. a description of the material being used (including type and brand)
4. protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
5. location of the incident
6. task being performed when the incident occurred
7. training records of covered employee or student

B. If revisions to this HCPP are necessary Scott Anderson, Executive Director of Facilities will ensure that appropriate changes are made.

C. The following protocol is followed for evaluating the circumstances surrounding an exposure incident. All exposure incidents will be evaluated by Scott Anderson, Executive Director of Facilities. The exposure incident will be investigated and all facts will be reviewed to ensure all safety protocols were followed and that proper medical attention was provided.

Recommendations and corrective action will be initiated when warranted by Scott Anderson.

XII. CHEMICALS IN UNLABELED PIPES

Prior to starting work in areas where chemicals are transferred through unlabeled pipes, covered individuals should contact A. Scott Anderson, Executive Director of Facilities 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 Scott Anderson, Executive Director of Facilities. 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 by contacting Scott Anderson, Executive Director of Facilities for review by any interested employee.

B. A copy of this program will be made available, upon request, to employees, to students and their representatives. The Hazard Communication Program Plan is available by contacting Scott Anderson, Executive Director of Facilities for review. It is also maintained on the College intranet for staff review.