

# NORTHEAST COMMUNITY COLLEGE



# HAZARD COMMUNICATION PLAN

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**NORTHEAST COMMUNITY COLLEGE**

**HAZARD COMMUNICATION PLAN**

Per Administration Policy Code 2070, Environmental Safety and Health, protection of the health and safety of the employees and students of Northeast Community College is an important goal of the Administration. Furthermore, Northeast Community College is committed to achieving compliance with OSHA 29 CFR 1910.1200 regarding Hazard Communication.

A Hazard Communication Plan has been implemented to accomplish the objectives stated above. The plan was developed under the guidance of the Safety Sub-Committee. Each employee will be responsible for compliance with the plan.

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Dr. Bill Path, President

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Date

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# **NORTHEAST COMMUNITY COLLEGE WRITTEN HAZARD COMMUNICATION PLAN**

## **1.0 General**

One of the goals of Northeast Community College is to promote safe work practices in an effort to minimize the incidence of injury and illness experienced by employees. Relative to this goal, Northeast Community College has adopted the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, codified as 29 CFR 1910.1200. The purpose of the Hazard Communication standard is to ensure that the hazards of all chemicals used in the workplace are evaluated and that information concerning their hazards is transmitted to employers and employees.

This plan is written in conjunction with the Policy and Procedures Code 2070, Environmental Safety and Health.

Type of Business: Post-Secondary Education

## **1.1 Location of Hazard Communication Plan**

The written Hazard Communication Plan is available for review by all college employees at the following central locations:

- Library
- Office of the Physical Plant
- Northeast Community College's Internet Site: [www.northeastcollege.com](http://www.northeastcollege.com)

Copies of the plan may be obtained by contacting the Physical Plant office.

A copy of the OSHA Standard 29 CFR 1910.1200 Hazard Communication can be found in the Physical Plant office.

## **1.2 Designated Personnel**

The following employees have been designated as persons responsible for updating and maintaining the hazard communication plan, employee training, student training, labeling and ensuring Material Safety Data Sheets (MSDS) are obtained/maintained.

- a. Hazard Communication Plan:  
The Director of Physical Plant/Safety Director is the overall Hazard Communications coordinator. Each department is responsible for its respective area.
- b. Employee Training:  
Training will be scheduled through a combined effort of the Safety Sub-Committee, Faculty & Staff Education & Development Committee and the General Counsel and Executive Director of Human Resources.

- c. Student Training:  
Individual instructors are responsible for training students of hazardous materials in their areas.
- d. Labeling on In-House Containers:  
It will be the responsibility of the employee in each area to insure proper labeling of containers.
- e. Labeling on Shipped Containers:  
It will be the responsibility of central receiving to insure that all boxes, containers, and cartons which are suspect of containing chemicals are appropriately labeled. Shipments that show damage, leak or spill are to be refused.
- f. Obtaining/Maintaining MSDS:  
A central file of MSDS will be obtained by and maintained within the office of Physical Plant.
- g. Informing Contractors:  
It will be the responsibility of the Director of Physical Plant/Safety Director to inform contractors of the hazards in the work area on campus to which they are assigned.

### **1.3 Updating and Evaluating the Hazard Communication Plan**

At least once per year, the Safety Sub-Committee will review and update its effectiveness to ensure it meets the minimum requirements outlined by the standard. The Safety Sub-Committee, with the assistance of each department, will assess the hazardous chemicals and materials in each work area, develop policies, and implement this written plan on a continuous basis. The update will consist of each of the following elements of the Hazard Communication Plan:

- a. Hazard assessment
- b. Assessment of applicable regulations
- c. Written plan(s)
- d. College Policies
- e. College Discipline/Procedures
- f. Training
- g. Inspection audits
- h. Designated employee accountability

## **2.0 Container Labels**

Container labels will be in accordance with current and accepted OSHA and National Fire Protection Association (NFPA) Standards.

### **2.1 Materials Received**

All containers must enter and be received in the warehouse by shipping/receiving. All containers received for use in each of the work site areas will rely exclusively on the container labels prepared by the chemical manufacturer, importer or distributor. These labels will be checked by the department receiving the material to verify that they are properly and clearly marked in English with the following:

- Name of the product
- Pertinent safety data
- Name and address of the manufacturer

### **2.2 Materials Shipped**

Any manufactured hazardous substances leaving the campus must be accompanied by the data listed in paragraph 2.1 of this document. In addition, if a material is shipped, a MSDS is to be included. Chemical waste will be shipped via a contracted vendor, in compliance with EPA, OSHA and DOT regulations. Records will be maintained in the office of Physical Plant.

### **2.3 Missing Labels**

Missing, defaced or illegible labels will be replaced immediately with clean, properly marked ones. If there are labels missing, contact the Physical Plant office.

### **2.4 Portable Containers**

Portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer are not required to be labeled if completely consumed by the end of the work period. However, on all other portable containers, it will be a college plan to label such containers with a manufacturer's label or generic label that lists the contents of the container and reflects an appropriate hazard warning.

### **3.0 Material Safety Data Sheets**

A MSDS for each hazardous chemical on Northeast Community College campus will be kept at the work area central location in a notebook and will be available for review by all employees during working hours.

A copy of each new MSDS that is received or brought into the facility by any department or employee must be forwarded to the Physical Plant office. The department that received the material should also keep a copy. The chemical will be added to the Master Chemical List. The original MSDS will be stored for future reference. The new MSDS must be received prior to or at the time of the first shipment of any potentially hazardous chemical from a supplier. It is the plan of Northeast Community College to stop purchasing products from any supplier that does not provide an appropriate MSDS in a timely fashion.

The supervisor/instructor in each area where chemicals are used is responsible for maintaining a copy of the MSDS for each hazardous chemical used in that area. MSDSs must be located in the building/area where the chemical is used/prepared.

#### **3.1 Location**

A master list of hazardous chemicals will be maintained for reference in the Physical Plant office. This list will be expanded as new chemicals are ordered and/or received. All new chemical products will be appropriately labeled and a MSDS obtained before receiving material at Northeast Community College. Outdated MSDSs will be kept for a period of 30 years as required by law. These MSDSs will be kept in the Physical Plant office.

#### **3.2 Hazard Determination**

MSDS will be requested for all incoming hazardous substances. Northeast Community College will rely on furnished MSDSs for their hazard determination evaluations.

#### **3.3 MSDS Information**

The designated person will ensure that all MSDS have complete information in each of the following categories:

- a. Identities used on label
- b. Chemical and common names
- c. Physical and chemical characteristics
- d. Physical hazards
- e. Health hazards
- f. Primary routes of entry
- g. Air exposure limits: Permissible Exposure Limits (PELs), Threshold Limit Values (TLVs)
- h. Carcinogenicity

- i. Precautions for safe handling
- j. Control measures
- k. Emergency and first aid procedures
- l. Date of preparation of MSDS
- m. Name/address/phone number of MSDS preparer or distributor

### **3.4 Missing MSDS**

Northeast Community College will provide a system under which the Physical Plant office, with the help of the Purchasing Department, will obtain MSDSs from all suppliers of chemical products. The system would include the following:

- a. Sending form letters to suppliers requesting information/MSDSs.
- b. A flagging system to ensure that MSDSs are received and kept current.
- c. Maintenance of MSDS files that would be available to employees, their representatives, local jurisdictional authorities and health or medical officers as required by regulations.
- d. A purchase requisition noting that the proper labels are either to be attached to all containers received, or to be sent with the order, and that the supplier certifies that all MSDSs and labels comply with the standard.

## **4.0 Employee Information and Training**

### **4.1 Initial Training**

Prior to beginning work with hazardous chemicals, each employee will be required to attend a hazard communications training class. Supervisors will ensure that new employees are trained, and that the training is documented.

### **4.2 Retraining**

Additional training will be conducted when new chemicals are introduced into the work area or when a new employee is assigned or transferred to a work area in which chemical products are used. Retraining is not required if the new chemical contains hazards similar to previously existing chemicals for which training has already been conducted. Attendance is mandatory.

### **4.3 Record Keeping**

The college's designated trainer will ask employees attending the hazard communications training class to sign a sheet verifying attendance and receipt of the hazard communication material. Documentation of training will be kept in the Human Resource office.

#### **4.4 Training Format**

Each employee attending the safety course will receive hazard communication material. The training will consist of a lecture and/or audio/visual aids in accordance with 29 CFR 1910.1200 (h). Training will include the following information:

- a. An overview of the requirements contained in the Hazard Communication Standard.
- b. Chemicals present in their workplace operations.
- c. The location and availability of the written hazard communication plan.
- d. Physical and health effect of the hazardous chemicals.
- e. Methods and observation techniques used to determine the presence or accidental release of hazardous chemicals in the work area.
- f. How to lessen or prevent exposure to these chemicals through usage of control/work practices and personal protective equipment.
- g. How to read labels and review MSDSs to obtain appropriate hazard information.
- h. The location of MSDS files and hazardous chemical list.
- i. The Instructional Division will provide hazard communication training for all students as required.

#### **5.0 Hazardous Non-Routine Tasks**

##### **5.1 Northeast Community College Guidelines**

It is Northeast Community College's plan that no employees will begin work in or on any non-routine task without first notifying his/her supervisor and without first receiving a safety briefing.

##### **5.2 Specific Training**

Any non-routine task will require specific training concerning the hazards associated with the task. This training information will include:

- a. Specific chemical hazard.
- b. Protective/Safety measures the employee can take.
- c. Measures the College has taken to lessen the hazards including: administrative controls, engineering controls, and personal protective equipment (PPE) needed.

##### **5.3 Non-Routine Tasks**

The college has not determined any known non-routine tasks involving hazardous chemicals/materials in the work place. If an employee suspects a task to be hazardous and no specific training has been received, the supervisor must be contacted before proceeding.

## **6.0 Chemicals in Unlabeled Pipes**

Prior to beginning any work on unlabeled pipes, employees will contact Director of Physical Plant/Safety Director. Specific training regarding potential hazards and safety precautions must be conducted. Information for the piping system which identifies the location of all pipes and their contents is available from the Physical Plant.

## **7.0 List of Hazardous Chemicals**

Inventories of hazardous chemicals and materials used at Northeast Community College are located in the Physical Plant office. Due to the large inventory throughout the campus, individual inventories per location are not attached.

## **8.0 Northeast Community College Plan**

Northeast Community College has set forth the Hazard Communication Plan to be adhered to by all employees and contractors working on college property. Employees found to be knowingly violating the plan set forth will be subject to disciplinary actions, up to and including immediate termination.

## **9.0 Informing Contractors**

It is the responsibility of the Director of Physical Plant/Safety Director to provide contractors and employees information about the hazards which they may be exposed to while on the job site. Please refer to the "Contractor Notification Plan" for detailed information.