

# Hazard Communication Program

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## Purpose

The purpose of this program is to describe the means by which Carroll Community College (CCC) will ensure information concerning the hazards of chemicals present in the workplace is transmitted and/ or made readily available to employees. This program is intended to address the requirements of the Occupational Safety and Health Act (OSHA) Hazard Communication Standard (HCS) found at 29 CFR 1910.1200. A hazard communication program describes how the criteria specified for labels and other forms of warning, safety data sheets, and employee information and training will be met. It must include a list of the hazardous chemicals known to be present, the methods the employer will use to inform employees of the hazards of non-routine tasks, hazardous chemical training programs, and effective protective measures. Classifying the potential hazards of chemicals and communicating same to employers is the responsibility of the chemical manufacturer. Communicating and making that information available to the workforce is the responsibility of the employer. The following written Hazard Communication Program, which is established for CCC, is to be reviewed and revised annually and as needed to reflect current conditions and practices.

The written hazard communication program is included in Carroll Community College's Occupational Safety and Health Manual. Copies of the written program will be available to all interested employees and their representatives upon request.

## Definitions

1. Article - a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of 1910.1200), and does not pose a physical hazard or health risk to employees.
2. Chemical - any substance, or mixture of substances.
3. Chemical manufacturer - an employer with a workplace where chemical(s) are produced for use or distribution.

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4. 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.
5. Classification - to identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical in 1910.1200. In addition, classification for health and physical hazards includes the determination of the degree of hazard, where appropriate, by comparing the data with the criteria for health and physical hazards.
6. Common name - any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.
7. Container - any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of 1910.1200, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
8. Employee - a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.
9. Employer - a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.
10. Exposure or exposed - that 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. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)
11. Foreseeable emergency - any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace. Hazard class means the nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.

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12. Hazard - not otherwise classified (HNOC) means an adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in 1910.1200. This does not extend coverage to adverse physical and health effects for which there is a hazard class addressed in 1910.1200, but the effect either falls below the cut-off value/concentration limit of the hazard class or is under a Globally Harmonized System (GHS) hazard category that has not been adopted by OSHA (e.g., acute toxicity Category 5).
  13. Hazard statement - 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.
  14. 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.
  15. 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. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to 1910.1200—Health Hazard Criteria.
  16. Immediate use - that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
  17. Importer - the first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.
  18. Label - an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.
  19. Label elements - the specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.
  20. Mixture - a combination or a solution composed of two or more substances in which they do not react.

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21. Physical hazard - 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. See Appendix B to 1910.1200—Physical Hazard Criteria.
22. 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 under this standard for application to a hazard category.
23. 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 or handling.
24. Primary container - the container provided by the manufacturer or distributor and used to ship the purchased material to the end user.
25. Produce - to manufacture, process, formulate, blend, extract, generate, emit, or repack.
26. Product identifier - the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.
27. Responsible Parties- positions of the department purchasing, storing, and using substances for which an SDS is published. They serve as representatives of their department and have a role related to departmental compliance of the Hazard Communication standard.
28. Safety data sheet (SDS) - written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of 1910.1200.
29. Secondary container - a container to which or from which a chemical is transferred from the primary container.

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30. 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 in 1910.1200 are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.
  31. Simple asphyxiant - a substance or mixture that displaces oxygen in the ambient atmosphere and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.
  32. Specific chemical identity - the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.
  33. Substance - chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.
  34. Use - to package, handle, react, emit, extract, generate as a byproduct, or transfer.
  35. Work area - a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.
  36. Workplace - an establishment, job site, or project, at one geographical location containing one or more work areas.

## Responsibilities

To facilitate compliance with this program, the following levels of responsibility have been established:

1. Senior Manager of Facilities Safety, Compliance, and Training
  - a. Responsible for administering and maintaining this program and ensuring that it meets all requirements of 29 CFR 1910.1200
  - b. Responsible for management of employee hazard communication training and training records

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## 2. Departmental Supervisors/ Chemical Hygiene Officer/Laboratory Technicians

- a. Responsible for collecting the SDSs of materials used in their work area, and providing an electronic copy to the Senior Manager of Facilities Safety, Compliance, and Training for inclusion in Vector Solutions, Vector SDS and Chemical Management system
- b. Responsible for container labeling
- c. Responsible for enforcing safe work practices including the use of Personal Protective Equipment (PPE)

## 3. Responsible Parties (a list of which is appended to this document) are responsible to:

- a. Understand and comply with the College's regulatory obligation to have and make accessible to employees, the safety data developed and published by manufacturers of hazardous substances.
- b. Act as a resource for the departments they represent to help others understand the College's obligations and how safety data is collected, stored, and retrieved.
- c. Collect and provide to the Senior Manager of Facilities Safety, Compliance, and Training the SDS for any chemical or substance under their control, for which an SDS exists:
  - i. With first shipment, and,
  - ii. Each time a manufacturer updates existing safety data for a product.
- d. Perform annual departmental inventory inspection to identify substances for which an SDS has not been secured:
  - i. Obtain missing SDSs, and,
  - ii. Provide the SDSs to the Senior Manager of Facilities Safety, Compliance, and Training, and,
  - iii. Identify procedural missteps.
- e. Communicate with the Senior Manager of Facilities Safety, Compliance, and Training on an ongoing basis regarding SDS program procedures.
- f. Successfully complete initial SDS training at the time Responsible Party status is assigned, and ongoing as needed.

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## 4. Individual employees

- a. Responsible for receiving and understanding training and following safe practices and procedures as instructed

## 5. Contractors

- a. All contractors shall, on request, make available to the College their Chemical Information Lists and copies of SDS for all hazardous substances they plan to bring on campus
- b. The College employee responsible for the hiring of a contractor to work on College property is responsible for communicating the request for exchange of chemical hazard information and SDS
- c. Independent contractors shall not perform any work until requested information is exchanged between the College supervisor and the independent contractor.

## Exemptions

This program does not apply to the following:

- 1. Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), when subject to regulations issued under that Act by the Environmental Protection Agency.
- 2. Any hazardous substance as such term is defined by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. 9601 et seq.) when the hazardous substance is the focus of remedial or removal action being conducted under CERCLA in accordance with Environmental Protection Agency regulations.
- 3. Tobacco or tobacco products.
- 4. Wood or wood products, including lumber which will not be processed, where the chemical manufacturer or importer can establish that the only hazard they pose to employees is the potential for flammability or combustibility (wood or wood products which have been treated with a hazardous chemical covered by this standard, and wood which may be subsequently sawed or cut, generating dust, are not exempted).

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5. Articles (as that term is defined in paragraph (c) of 1910.1200).
6. Food or alcoholic beverages which are sold, used, or prepared in a retail establishment (such as a grocery store, restaurant, or drinking place), and foods intended for personal consumption by employees while in the workplace.
7. Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies).
8. Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace.
9. Any consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended.
10. Nuisance particulates where the chemical manufacturer or importer can establish that they do not pose any physical or health hazard covered under 1910.1200.
11. Ionizing and nonionizing radiation.
12. Biological hazards.

## Workplace Chemical List

1. CCC develops and maintains lists of hazardous chemicals present in all work areas. Chemical lists can be generated and made available electronically by a QR Code via a request to the Senior Manager of Facilities Safety, Compliance, and Training or by viewing: [Vector SDS and Chemical Management](#). Hazardous chemical lists consist of the chemical manufacturer's name and the chemical identity referenced on the SDS and on the container shipping label, often being a product or trade name. The Standard does not require that the hazards of each chemical be included on the list. Employees are informed of hazards through SDSs, labels, and training.

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2. Departmental Supervisors/ Chemical Hygiene Officer/Laboratory Technicians are responsible for reviewing and updating the workplace chemical list for their department as necessary, but at least annually.
3. Chemical-specific information for each listed chemical can be obtained by reviewing the [Vector SDS and Chemical Management](#).

## Safety Data Sheets

1. A manufacturer-published or distributor-supplied SDS for each hazardous chemical purchased is available at the [Vector SDS and Chemical Management](#) or by scan of a QR code poster.
2. Departmental Supervisors/Chemical Hygiene Officer/Laboratory Technicians are responsible for SDS management and will ensure that:
  - a. Incoming SDSs are reviewed for new and significant health/safety information and that any new information is passed on to affected employees.
  - b. Incoming SDSs are forwarded to the office of the Senior Manager of Facilities Safety, Compliance, and Training.
  - c. Hazardous chemicals are not received without an SDS.
  - d. Hazardous chemicals mistakenly received without an SDS are withheld from use until a current SDS is obtained.
  - e. Missing SDSs are requested from an appropriate source (e.g., chemical manufacturer, distributor, or electronic database).
  - f. Affected employees are provided a description of any alternative system (such as electronic databases) being used in lieu of manufacturer's SDSs.
  - g. SDS files for each work area will be kept in the control of the laboratory supervisor.
  - h. SDSs will be readily available for review by employees or their designated representatives upon request during the requestor's work shift.

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- i. Chemical inventory lists are updated automatically in the [Vector SDS and Chemical Management](#) site. These lists are alphabetic listings based on the chemical identifier as contained on the SDS.
- j. Any time a chemical is removed from inventory, the chemical is automatically removed from the inventory listing.
- k. Each time a new chemical is received it is added to the inventory listing.
- l. Chemical inventory lists are audited for accuracy on an annual basis and outdated lists are retained for the duration of use plus thirty (30) years in accordance federal standards.

## Chemical Container Labels

1. All primary containers of hazardous chemicals used or stored by CCC will be labeled using the manufacturer-published or distributor-supplied label. No other labelling system is in use.
2. Departmental Supervisors/Chemical Hygiene Officer/Laboratory Technicians are responsible for maintaining legible and clean hazardous chemical labeling and will verify that all containers, both primary and secondary, of hazardous chemicals are clearly labeled to include:
  - a. Product identifier
  - b. Signal word
  - c. Hazard statement(s)
  - d. Pictogram(s)
  - e. Precautionary statement(s)
  - f. Name, address, telephone number of the chemical manufacturer, importer, or other responsible party.

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3. A description of alternative labeling systems, if used, must be provided to employees. Examples of acceptable alternative labeling systems are the National Fire Protective Association (NFPA) 704m Standard and the Hazardous Materials Information Systems (HMIS) Standard.
  4. CCC will rely on manufacturers and/or distributors to provide labels which meet the above requirements for all containers of purchased hazardous chemicals and will re-label containers only when a manufacturer-published or distributor-supplied label is illegible but where the identity of the chemical is absolutely known. The College will rely on the labels as supplied by the chemical manufacturer for all products purchased. Any product delivered with a missing, damaged, or illegible label must be withheld from use, secured and returned to the vendor.

## Personal Protective Equipment

1. CCC will provide appropriate personal protective equipment (PPE) to all employees who use or handle hazardous chemicals.
2. Departmental Supervisors/Chemical Hygiene Officer/Laboratory Technicians are responsible for enforcing the wearing of PPE, ensuring appropriate equipment is available, and conducting training which includes the following:
  - a. Proper selection of PPE based on:
    - i. Routes of entry
    - ii. Permeability of PPE material
    - iii. Duties being performed by the employee
    - iv. Hazardous chemicals present
  - b. Proper fit and functionality of PPE as described by the manufacturer's specifications.
  - c. Appropriate maintenance and storage of PPE.

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## Training

1. CCC will provide an education and training program involving classroom presentation of commercially available content, accompanied by an assessment of our employee's understanding of the material. Training will be conducted for all workers who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.
2. Covered employees are routinely identified and included in the training program.
3. Covered employees are provided information concerning the hazardous chemicals to which they may be exposed during the performance of non-routine tasks.
4. New employees are trained prior to being required to use or handle a hazardous chemical.
5. Employees must receive refresher training whenever a new chemical hazard is introduced to their individual work assignment.
6. The need and frequency for additional refresher training is assessed based on observation of work practices.
7. Employees subject to these training requirements sign an attendance roster for each training session attended, verifying that they received and understood the information.
8. The Senior Manager of Facilities Safety, Compliance, and Training is responsible for the employee training program and will ensure appropriate training is provided to all covered employees and includes:
  - a. The location of hazardous chemicals in the employee's work areas.
  - b. The location and availability of the written hazard communication program.
  - c. The location of area-specific chemical lists and SDSs.
  - d. Methods that may be used to detect the presence or release of a hazardous chemical.

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- e. The information provided on SDSs and chemical container labels, such as:
    - i. The physical and health effects of exposure.
    - ii. Safe handling of hazardous chemicals.
    - iii. First aid treatment for exposure to hazardous chemicals.
    - iv. Safety instructions for clean-up and disposal of hazardous chemicals.
    - v. Appropriate personal protective equipment.

## Record Keeping and Certification

1. Safety Training records for Carroll Community College employees shall include the following:
  - a. Names of training attendees.
  - b. The dates of the training sessions.
  - c. The contents or a summary of the training sessions.
  - d. The name(s) and title(s) of person(s) conducting the training sessions.
2. Safety Training records shall be maintained for a length of time in accordance with industry and OSHA standards.
3. All third-party contractors are responsible to maintain safety training records for their employees in accordance with industry and OSHA standards.

Revision Notes:

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Revised – 9/17/25, titles, rewrite for Vector SDS, nh/la