

County College of Morris
Hazard Communication Program

March 2024

County College of Morris

Written Hazard Communication Program

Policy and Administration

It is the intention of County College of Morris (CCM) to comply fully with the Public Employees Occupational Safety and Health (PEOSH) Hazard Communication Standard (HCS), 29 CFR 1910.1200/N.J.A.C. 12:100-7.

New Jersey PEOSH adopted the OSHA HCS of 2012, which incorporates the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). GHS provides a uniform approach for the classification and presentation of hazard information.

Effective June 5, 2017, PEOSH added additional HCS requirements for training and documentation, providing stronger protection for New Jersey's public employees.

CCM provides information to employees about the hazardous chemicals in its workplace, their associated hazards, and the methods for controlling these hazards. CCM has established the following required elements of the Standard:

- (1) A list of hazardous chemicals;
- (2) Safety Data Sheets (SDSs) and Hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals;
- (3) Labeled containers to meet Right to Know (RTK) and Hazard Communication requirements; and
- (4) A training program for employees who work with or have a potential for exposure to hazardous chemicals.

This written program applies to work operations at CCM where employees are or may be exposed to hazardous chemicals under normal working operations or during foreseeable emergency situations.

The College President and the Vice Presidents are responsible for ensuring that the applicable operations of the college are conducted in accordance with the Hazard Communication Standard.

Under the direction of the Director of Public Safety, the Environmental Safety Coordinator, located in Building 675, has overall responsibility for the written HCS program and responsibility for the annual review and update. The written program is available to employees on the Public Safety website. The Environmental Safety Coordinator also makes available the written program to employees upon their request within three business days of receiving the request in writing

As required under the HCS, employees are informed of the contents of this program, the location and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from the hazardous chemicals. The methods of communicating hazard information include:

- Labels
- Safety Data Sheets (SDS's)
- Hazardous Substance Fact Sheets (HSFS's)
- Warning signs
- Training.

Employees performing non-routine tasks involving hazardous chemicals receive training on the hazards of the chemicals, precautions to be implemented to reduce exposure, personal protective equipment required and other relevant information prior to use. Training is conducted by a technically qualified person (i.e. Environmental Safety Coordinator or supervisor). Employees can obtain additional information regarding Hazard Communication and the RTK program from the resources listed in Appendix A.

Inventory/Survey of Hazardous Chemicals

CCM utilizes the annual NJ Right to Know (RTK) Survey as the list of hazardous chemicals at CCM. Each year the Environmental Safety Coordinator updates the RTK Survey in coordination with departments.

Each department must inform the Environmental Safety Coordinator if a new hazardous material is being introduced to the department prior to purchase. The Environmental Safety Coordinator reviews the proposed material and use, and the safety data sheet is added to CCM's central on-line SDS database. The Environmental Safety Coordinator maintains a list of new materials that is then added to the RTK Survey during the next annual reporting.

Safety Data Sheets (SDSs) and Hazardous Substance Fact Sheets (HSFSs)

SDSs and HSFSs provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the SDSs are maintained in an on-line database which is readily accessible to employees on CCM's intranet website <http://ccm.kha.com/>. The SDS database can be searched by product name, chemical name or department, and SDSs can be viewed or downloaded. The third-party provider of the on-line system regularly reviews the database to ensure the most recent revision is maintained.

CCM obtains and maintains SDSs on all products containing hazardous chemicals and HSFSs are available for all hazardous chemicals. The Environmental Safety Coordinator manages the uploading of new SDSs to the on-line database. HSFSs are available to employees directly from the Department of Health website at <http://web.doh.state.nj.us/rtkhsfs/indexfs.aspx>. If additional information is needed about a hazardous chemical or product, if an SDS is missing, or if an SDS

has not been supplied with the initial shipment, the Environmental Safety Coordinator will contact the manufacturer or supplier.

Each department is responsible for ensuring the SDS files contained within their department's on-line "binder" are updated as needed. As a policy of CCM, an SDS and HSFS hard copy will be provided to the requesting employee immediately upon request, or within 5 working days of the request if the SDS or HSFS is not immediately available.

Any new products that are planned to be used in this workplace must be reviewed by the Environmental Safety Coordinator to ensure that the SDS's are obtained and reviewed before purchase and use.

The Environmental Safety Coordinator maintains a copy of the CCM safety data sheets on a disc as a backup to the online system in the event of a loss of the intranet. The disc is maintained in the Public Safety office in Building 675.

Label Systems

Each department at CCM ensures that all containers of hazardous chemicals in its workplace are properly labeled as required by the PEOSH HCS and NJ RTK, and updates the labels as necessary if they should become illegible, fall off the container, or are obscured in any manner. All containers will be checked for proper labeling requirements when received by the ordering department. Containers not bearing a PEOSH HCS label are not accepted by our facility. If NJ RTK labeling is not on the manufacturer's label, the departments ensure the information is added to the container labeling. CCM has provided employees with training on GHS, and has implemented the labeling system for secondary containers at CCM. Since some older containers of materials on site may still contain National Fire Protection Association (NFPA) or Hazardous Materials Identification System (HMIS) labeling systems, CCM's HCS training includes a review of these labeling systems as well.

- ◆ Stationary containers in an area with similar contents and hazards have signs posted on or above them to convey the hazard information.
- ◆ Employees transferring hazardous materials from a labeled container to a portable or process container intended only for their immediate use during the work shift do not have to label the portable container.
- ◆ If a portable container is stored beyond the employee's shift, or will be used by other workers, the employee labels the portable container with the PEOSH HCS information from the properly labeled larger container.
- ◆ Minimally, the secondary label should include the following **GHS labeling** elements:
 - Identity of the chemical or product
 - Signal Word (Danger or Warning)

- Hazard Statement
- Pictogram(s) – note that secondary container pictogram labels can have black borders.
- ◆ In addition, the secondary label must include the following **NJ RTK labeling** elements:
 - Chemical names and Chemical Abstract Service (CAS) registry numbers of all hazardous substances and
 - Top 5 predominant ingredients.
- ◆ PEOSH HCS, GHS and NJ RTK labeling requirements are explained during employee training.
- ◆ The manufacturer shall be relied upon to provide the hazard ratings for each hazardous product.
- ◆ Labels are maintained on all containers and must remain legible.
- ◆ Faculty and staff may not deface or remove existing labels on incoming chemicals or chemicals in use.
- ◆ To ensure a thorough labeling program, secondary containers of products that are non-hazardous are labeled “Non-hazardous”. RTK labeling is still required. If contents are unknown, the label will state “Contents Unknown”.
- ◆ Pipes containing hazardous substances shall be labeled, and tags specifying the identity of the hazardous substance shall be affixed to the point at which a substance enters the pipeline and at normally operated valves, outlets, vents, drains and sampling connections.

Hazardous Non-Routine Tasks

Faculty or staff performing any non-routine tasks involving hazardous chemicals, receive training on the hazards of the chemicals, precautions to be implemented to reduce exposure, personal protective equipment required and other relevant information prior to use. The training is conducted by a technically qualified person (Environmental Safety Coordinator, faculty member, etc.).

Employee Training

All faculty and staff who work with or have the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies receive training initially and every two years on the safe use of those hazardous chemicals. The Environmental Safety Coordinator will provide the new employee training and bi-annual refresher training. Department supervisors

will provide initial department specific (walk through) training and supplemental training when the department introduces a new product containing hazardous chemicals.

- ◆ Training is mandatory for those employees identified as exposed or having the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies.
- ◆ Human Resources (HR) provides Appendix B “New Jersey Worker & Community RTK CCM Compliance Program Pre-Employment Workers’ Right Notice” to new employees during HR orientation and maintains copies.
- ◆ The Environmental Safety Coordinator reviews the job title and department and determines whether the employee requires HCS initial training, and if so, adds them to the HCS training roster.
- ◆ The Environmental Safety Coordinator e-mails the employee instructions on accessing the HCS New Employee training on-line and tracks completion.
- ◆ The Environmental Safety Coordinator e-mails the department chair or designee to complete the Departmental Initial Training and return training documentation to Public Safety. A suggested form is in Appendix C.
- ◆ The Environmental Safety Coordinator meets the definition of a technically qualified person through his/her education, credentials and experience.
- ◆ Training is provided at no cost to the employee and is provided during working hours. The training is appropriate in content and vocabulary to the educational level, literacy and language of the employees.
- ◆ The documentation of training required by PEOSH HCS is maintained in the Public Safety Office in Building 675.
- ◆ The initial and refresher training programs for employees are reviewed annually by the Environmental Safety Coordinator who will notify area supervisors of the training needs of their employees.

The **Hazard Communication Standard training** includes the following topics:

1. An explanation of the PEOSH HCS and CCMs written plan, including location and access;
2. Chemical and physical properties of hazardous materials and methods used to detect the presence or release of hazardous chemicals;
3. Physical hazards of chemicals such as the potential for fire and explosion;
4. Health hazards (both acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical;
5. Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks;
6. Standard operating procedures to ensure protection when cleaning hazardous chemical spills and leaks;
7. The location of and responsible person for maintaining SDSs, HSFs, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;

8. An explanation of the applicable provisions of the Worker and Community Right-to- Know Act;
9. How to read and interpret the information on PEOSH HCS and RTK labels, HSFSs and SDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL.
10. A copy of the RTK brochure that can be printed by the employee.

CCM's Hazard Communication training is available on-line on Blackboard at <https://courses.ccm.edu/> and at Safe Colleges at <http://ccm-nj.safecolleges.com/>

The **Department HCS initial training** includes a walk-through of the workplace and addresses chemical hazards the employee may encounter through the performance of their duties. The Department initial training consists of:

1. A physical walk-through of the location of the hazardous materials present in the employee's work area. Employees assigned campus wide or to more than one location may be shown representative work areas.
2. How to access the on-line SDS system, if applicable, the location of hard copy SDS's, and a review of the proper use, storage and disposal of hazardous materials.
3. Proper use of personal protective equipment required for job tasks.
4. Location of emergency equipment including emergency eye wash, safety shower, ventilation equipment, emergency call boxes, etc.

A training form to be completed and returned to Human Resources is included in Appendix C. Training must be documented with a signature sheet with a summary of topics covered.

Contractor Employees

The sponsoring department at CCM is required to advise outside contractors of any chemical hazards that may be encountered in the normal course of their work on the site, the labeling systems in use, protective measures to be taken, the location and availability of SDS's, and HSFSs.

It is also the responsibility of the sponsoring department to determine if the contractor will be using any hazardous materials at CCM. Each outside contractor who will be bringing hazardous chemicals on the site will provide the Environmental Safety Coordinator with copies of SDS's for the hazardous chemicals, information on any special labels used, and precautionary measures to be taken while working with or around their hazardous chemicals or products prior to the start of the work.

Contractors will be required to maintain labeling on all hazardous chemicals in accordance with the PEOSH HCS and RTK standards and in a legible condition.

All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS, applicable SDS's and HSFS's, and other chemical information from the Environmental Safety Coordinator, Public Safety, Building 675, Room 155, x5551.



Appendix A

Agency Sources of Right to Know and Hazard Communication Information

For	Contact
<ul style="list-style-type: none"> • Right to Know Surveys completed by Public Employers • Hazardous Substance Fact Sheets 	<p>New Jersey Department of Health Workplace Health and Safety PO Box 368 Trenton, NJ 08625-0368 Phone: (609) 984-2202 Fax: (609) 984-7407 email: rtk@doh.nj.gov Web: www.nj.gov/workplacehealthandsafety/right-to-know/</p>
<ul style="list-style-type: none"> • Community RTK Surveys completed by Private Employers 	<p>New Jersey Department of Environmental Protection Office of Pollution Prevention and Right-to Know PO Box 420 Trenton, NJ 08625-0420 Phone: (609) 292-6714 Fax: (609) 292-1816 Web: https://nj.gov/dep/enforcement/opppc.html</p>
<ul style="list-style-type: none"> • OSHA Hazard Communication Standard 	<p>U.S. Department of Labor Occupational Safety and Health Administration (OSHA) http://www.osha.gov/dsg/hazcom/index.html</p>
<ul style="list-style-type: none"> • PEOSH Hazard Communication Standard 	<p>New Jersey Department of Health https://www.nj.gov/health/workplacehealthandsafety/peosh/peosh-health-standards/hazcom.shtml</p>
<ul style="list-style-type: none"> • HCS Pictograms and Hazards 	<p>U.S. Department of Labor - OSHA www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html</p>



Appendix B

New Jersey Worker and Community Right to Know Act County College of Morris Compliance Program Pre-employment Workers' Rights Notice

The New Jersey Worker and Community Right to Know (RTK) Act requires public employers to provide information about the hazardous substances at their workplaces. As an employee of the County College of Morris (CCM), you may encounter products that contain chemicals defined as hazardous by the New Jersey Department of Health.

The rights of a public employee under the Act include:

1. The right to work with labeled containers which identify their chemical contents.
2. The right to obtain a copy of the RTK Survey of hazardous substances for their workplace.
3. The right to get Hazardous Substance Fact Sheets and Safety Data Sheets about chemicals they may be exposed to or potentially exposed to from their employer.
4. The right to exercise any rights provided by the RTK Act without reprisals from their employer.
5. The right to file a complaint against their employer for not complying with the Act. Their name will be kept confidential.
6. The right to refuse to work with a substance if their employer has not given them the information they requested in writing within 5 working days. BEFORE they refuse to work with the substance, employees should call the NJ Department of Health at 609-984-2202.

You can obtain information about hazardous substances in your workplace from CCM's Right to Know Central File located in the Environmental Safety Coordinator's office in Public Safety.. Within five days of a written notice, you will be given access to CCM's annual Right-to-Know Survey, Hazardous Substance Fact Sheets and Safety Data Sheets.

If your position at CCM involves the use or possible exposure to hazardous substances, you will be required to complete **Hazard Communication Standard** training prior to the handling of any hazardous substance. You will receive information regarding the training from the Environmental Safety Coordinator.

CCM has made a commitment to promote your safety and well-being. We encourage you to review the information in the Right to Know Central File and ask questions as they arise. In addition, you may request any information relevant to your safety in the workplace by contacting the Environmental Safety Coordinator at x5551.



**New Jersey Worker and Community Right-to-Know Act
County College of Morris Compliance Program
Pre-employment Workers' Rights Notice**

I have read and understand the information provided regarding my rights under the New Jersey Worker and Community Right to Know Act.

Employee's Name

Employee's Signature

Date

.....
TO BE COMPLETED BY THE HUMAN RESOURCES DEPARTMENT

JOB TITLE _____

HIRE DATE _____

DEPARTMENT _____

****Please forward completed form to the Environmental Safety
Coordinator, Building 675, Room 155**



Appendix C

County College of Morris

Hazard Communication

Departmental Training Verification Form

<p>Department Specific Hazards and Procedures Review To be completed by employee’s supervisor/designated trainer.</p>
<p>Employee Name:</p>
<p>Job Title:</p>
<p>Department:</p>
<p>The employee identified above has received a review of the following department specific hazard communication information:</p> <ul style="list-style-type: none"> • The location of and means of access to the <i>CCM Hazard Communication Written Plan</i> and the hazardous chemical inventory for the department (RTK Survey); • The location of the Safety Data Sheet management system for the department; • The hazardous chemical container labeling systems used within the department; • The health and physical hazards of the chemicals used within the department (either chemical specific or by hazard group); • The exposure control methods/procedures in place including engineering, work practice and personal protective equipment (PPE); • The use and availability of personal protective equipment; • Procedures to follow in emergency situations: <ul style="list-style-type: none"> __ Evacuations __ Injuries/Illnesses __ Locations of safety equipment: Emergency safety showers and eyewashes __ Location of pull stations and emergency call boxes
<p>Supervisor/designated trainer name (print):</p>
<p>Supervisor/designated trainer’s signature:</p>
<p>Employee signature:</p>
<p>Date:</p>

Return a copy of the completed form to: Environmental Safety Coordinator, Public Safety, Building 675, Room 155.