

**Three Rivers Community College
574 New London Turnpike
Norwich, CT 06360**

HAZARD COMMUNICATION PROGRAM

I. Introduction

It is the intention of the Three Rivers Community College (TRCC) to comply fully in a prudent manner with all occupational safety and health standards/regulations. Consequently, this program to comply with the Department of Labor, Occupational Safety and Health Administration's Hazard Communication Standard 29 CFR 1910.1200, will be implemented and enforced. The complete Standard (29 CFR 1910.1200) is available on the Occupational Safety and Health Administration (OSHA) web site and can be accessed in its entirety at the following link: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099

This program has been established to provide guidelines for all employees, and for TRCC to meet the requirements of the Hazard Communication Standard. The program applies to any hazardous chemical(s), which is / are known to be present on the premises, that employees may be exposed under normal conditions of use or in a foreseeable emergency. This written Hazard Communication Program will be available to all employees under the Public Safety link on the TRCC Internet home page for review at all times.

The Hazard Communication Program can be accessed from active links listed in the Environmental Health and Safety Table of Contents under the aforementioned Public Safety link. Environmental Health and Safety Sections are posted as PDF files and require a program that can read PDF files, such as Adobe Reader which can be downloaded at no charge from Adobe's web site.

II. Hazardous Chemicals List

TRCC has established and will maintain a list of all the hazardous chemicals used on the premises. The individuals identified in Section IV. Material Safety Data Sheets (MSDS) will be responsible for maintaining the lists. In addition to the individual MSDS books for the respective laboratories listed in Section IV, master MSDS lists for the entire College will be available at the Central Utility Plant (CUP) and in the Security Supervisor's Office, room A-102, located in the main lobby of the College.

Adhering to the waste minimization program already established, no chemical will be purchased, for academic purposes, without the prior approval of James Copeland, Chemical Hygiene Officer; and no chemicals will be purchased for facilities purposes without the prior approval of Marilee H. Cohen, Director of Facilities.

The purchasing officer, Jim Kelly, will verify that any chemical order has been approved and

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will ensure that the applicable MSDS is provided with the order for receiving prior to ordering the chemical.

Upon receipt of a chemical shipment, Olan Angulo, the Shipping and Receiving clerk, will make 3 copies of any MSDS that arrives with a product. Copies will be distributed as follows along with the original MSDS to the destination location of the product.

- Original (shipped with product) to accompany product to destination
- 1 copy to Marilee H. Cohen, Director of Facilities
- 1 copy to Robert Martineau, Coordinator of Public Safety and Environmental Health
- 1 copy retained in Shipping and Receiving

III. Labeling of Hazardous Chemicals

Each container containing a hazardous chemical will be labeled with the identity and the appropriate hazard warning of the contents. In addition, those containers containing hazardous chemical(s) when received from a supplier or shipped to a customer will also have the name and address of the manufacturer or responsible party.

It is the responsibility of the following people to assure that the identity and the hazard warning are placed on all containers to which hazardous chemical have been transferred from the original drum or container:

- Marilee Cohen, Director of Facilities.
- James Copeland, Chemical Hygiene Officer, will maintain a master list for all Academic programs.
- Jessica McGuire, Laboratory Manager for the Sciences.
- Stu Cohen, Laboratory Manager for Technologies.
- Marc Filiatreault, Maintenance Supervisor.
- Tina Koslowski, Food Services Manager.

It is also the responsibility of these same individuals to assure that the identity, the hazard warnings and the name and address of the supplier are on the received and shipped container(s).

IV. Material Safety Data Sheets (MSDS)

This MSDS file will contain an MSDS for every hazardous chemical used on the premises. These sheets will be available to employees at all times. The MSDS files for this facility are kept in the offices of:

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- Marilee Cohen, Director of Facilities, will maintain a complete set of all MSDS in the Central Utility Plant, room G-101.
- Robert Martineau, Coordinator of Public Safety and Environmental Health, will maintain a complete set of all MSDS in the Security Office, room A-102.
- James Copeland, Chemical Hygiene Officer, will maintain a master listing for all Academics.
- Jessica McGuire, Laboratory Manager for the Sciences, will keep a complete set of MSDS for all chemicals used in the science labs in her office, room A-213. She will also maintain MSDS books in each lab specific to that lab.
- Stu Cohen, Laboratory Manager for Technologies, will keep a complete set of MSDS for all chemicals used in the technology labs in his office, room B-105. He will also maintain MSDS books in each lab specific to that lab.
- Marc Filiatreault, Maintenance Supervisor, will be responsible for maintaining individual MSDS books in all custodial closets and maintenance storage locations.
- Tina Koslowski, Food Services Manager will maintain MSDS for the kitchen.
- Olan Angulo, Shipping and Receiving clerk, shall maintain MSDS of all chemicals he has received in his office, room F-101.

Upon receipt of a new chemical, deletion of a chemical formerly present in a specific lab or area of the College, or when a MSDS is updated with new and significant information about the hazards, it is the responsibility of the above identified individuals to assure that the MSDS file or files for which they are responsible is / are kept up to date.

When ordering a new hazardous chemical for an academic program it is the responsibility of James Copeland, the Chemical Hygiene Officer or his designee to assure that the MSDS is kept up to date. The Director of Facilities is responsible for updating the maintenance MSDS file.

Employees wishing to gain access to the MSDS file or a copy of a MSDS for specific chemical(s) should consult the MSDS books for their particular area of interest, or contact the individuals identified above.

It should be noted that other departments of the College where hazardous chemicals could reasonably be encountered, specifically the Art Department and the Nursing Department do not use or possess Hazardous Chemicals as defined by the Standard; and, therefore preclude the necessity of including either department under the Hazardous Communication Program. The Art Department only utilizes ceramic glazes and acrylic paints; and MSDS sheets are maintained by Sandra Jeknavorian, Chair, of the Department of Humanities. The Nursing Department campus laboratories are computer based and do not use hazardous chemicals or generate hazardous waste streams. Any hazardous chemicals utilized by the Nursing Department are used at area hospitals where nursing students conduct their training.

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V. Information & Training

It is the policy of TRCC to provide an information and training program to all employees with the implementation of this program, at the time of a new employee's initial assignment, and whenever a new hazardous chemical is introduced into the working place.

This information and training program will include:

- (1) Requirements of 29 CFR 1910.1200.
- (2) Any operation in employees' work areas where hazardous chemicals are present.
- (3) Location and availability of the written hazard communication program, the list of hazardous chemicals and material safety data sheets.
- (4) Means of detecting the presence or release of hazardous chemicals in the work area.
- (5) Physical and health hazards of the chemicals in the area.
- (6) Measures employees can take to protect themselves from these hazards.
- (7) Explanation of the labeling system and the material safety data sheet.
- (8) Emergency procedures.
- (9) Details of the written hazard communication program developed by the employer.

It will be the responsibility of the Robert Martineau, the Coordinator of Public Safety and Environmental Health, reporting directly to Joseph Anderson, the Dean of Administration, the responsible TRCC Administrator for the program, to implement and maintain the information and training program.

Training will consist of classroom instruction to include, but not limited to written instructions and audiovisual presentations.

VI. Contractor Work

When it is necessary for an outside contractor to perform work at TRCC, it shall be the responsibility of the Director of Facilities, Marilee Cohen to inform the contractor of the identity of any hazardous chemicals to which the contractor may be exposed. The procedure for

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informing the contractor will include the following:

- A. Making the hazardous chemicals inventory of any designated work area where contract work is being performed available to the contractor and advise the contractor of the labeling system.
- B. Making the MSDS's of the identified hazardous chemicals in a designated work area available to the contractor.
- C. Making the contractor aware of the appropriate protective measures taken by TRCC employees in a designated work area.

It is also the responsibility of the Marilee Cohen, Director of Facilities to determine if the contractor will be using any hazardous chemicals and, if so, to take appropriate actions to assure the protection of the TRCC employees.

VII. Hazard of Non-routine Tasks

Prior to starting work on hazardous non routine tasks, every affected employee will be given information by Marilee Cohen, the Director of Facilities, about the hazardous chemical(s) to which they may be exposed. Such information will include, but not be limited to specific hazards associated with the chemical(s), protective measures (i.e. personal protective equipment, work practices, engineering controls etc.) and emergency procedures. Hazardous non routine tasks performed at TRCC are not regularly scheduled and only performed on an ad hoc basis.

It will be the responsibility of the Director of Facilities to document and communicate to the Dean of Administration, the Coordinator of Public Safety and Environmental Health and affected employees the specific hazardous non-routine task to be performed and the hazardous chemical(s) to include as applicable, hazards associated with chemicals contained in unlabeled pipe in the work area involved in such tasks.