



LANSING COMMUNITY COLLEGE

# Hazard Communication Program

This document provides the minimum requirements for developing, implementing, and maintaining Lansing Community College's Hazard Communications program. Specifically, it details the safety control measures the college has implemented to protect employees, students, visitors, vendors, and contractors. Lansing Community College's Hazard Communication Program conforms to MIOSHA General Industry Safety And Health Standard Part 92 & 430: Hazard Communication and Lansing Community College Board of Trustees Policy 6.090.

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Occupational and Environmental Safety Department, Administrative Services Division

REVISION DATE: 12/2/2024

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## Change Log

Change Number	Description of Change	Date of Change	Changes Made By

## 1.0 Introduction

Lansing Community College (LCC) is required to comply with the Michigan Occupational Safety and Health Administration (MIOSHA) Hazard Communication Standard for areas that expose or have the potential to expose members of the LCC Community to hazardous chemicals. All divisions, departments, and programs that use hazardous chemicals must comply with this program.

In accordance with the MIOSHA Hazard Communication Standard, the college has established LCC's Written Hazard Communication Program.

For assistance in implementing the LCC Hazard Communication Program, please review the LCC GUIDE - Implementation of a Hazcom Program for further information.

## 2.0 Definitions

- **Contractors:** Hired external workers.
- **Employees:** Company staff members (full-time, part-time, student employees, faculty members).
- **LCC Community:** Employees, students, visitors, vendors, and contractors.
- **Supervisor:** Manager of employees.
- **Temporary Agency Employees:** Workers from staffing agencies.
- **Vendors:** Product or service providers.
- **Visitors:** Non-staff guests.

## 3.0 Responsibility

Below are the roles and responsibilities of supervisors, employees, faculty, students, contractors, and vendors. For additional information, refer to Sections 4.0 - 11.0.

### 3.1 Occupational and Environmental Safety (OES) Department

Responsible for:

- Developing and providing administrative oversight of LCC's Written Hazard Communication Program.
- Providing subject matter expertise and technical resources to Executive Leadership Team (ELT) members and supervisors.
- Acting as a liaison with local, state, and federal regulatory agencies.

### 3.2 Executive Leadership Team (ELT) Member

Responsible for:

- Implementing and sustaining LCC's Written Hazard Communication Program.
- Ensuring supervisors have the authority to act to protect the safety of the LCC Community as assigned within their divisions, departments, or programs.
- Providing adequate financial resources and personnel to maintain safe work environments and instructional spaces.
- Acting when the LCC Community is not complying with LCC's Written Hazard Communication Program.

### 3.3 Supervisors

Responsible for:

- Representing their division, department, or program in maintaining a safe and healthy learning and working environment for the affected LCC Community.
- Implementing the Right to Know and Hazard Communication Program at the division, department, or program level that includes:
  - Inform the affected LCC Community if a contractor will be performing work involving hazardous chemicals.
- Ensuring a chemical inventory is created and maintained.
- Ensuring an SDS catalog is created and maintained.
- Ensuring that all received or shipped hazardous chemicals are labeled according to this program.
- Ensuring all secondary containers that are used are labeled with the proper product identifier and information regarding the chemical's physical and health hazards.
- Determining the contents of unlabeled containers and properly labeling the container.
- Ensuring employees are assigned the appropriate LMS training and creating and documenting site-specific employee training.
- Ensuring programs that have hazardous chemicals have a method for ensuring students are properly trained.
- Identifying and implementing corrective/preventive actions.
- Ensuring controlled contractors and vendors comply with this program's requirements by notifying the contractor if their employees may be exposed to LCC's chemical hazards and following section 3.7.
- Following the employee role as well as their primary supervisor role.

### 3.4 Faculty

Responsible for:

- Ensuring the instructional spaces are safe and free of recognized hazards.
- Consistently practice safety procedures.
- Following the employee role as well as their primary faculty role with responsibility to students.
- Ensuring students understand the hazard communication program, the location and use of eye wash stations, and the use of proper personal protective equipment.
- Ensuring that all students who may be exposed to hazardous chemicals know where to find SDSs and who to notify in case of exposure.
- Ensuring that all received or shipped hazardous chemicals are labeled according to this program.
- Ensuring all secondary containers are labeled.
- Determining the contents of unlabeled containers and properly labeling the container.
- Identifying and implementing corrective/preventive actions.

### 3.5 Employees

Responsible for:

- Ensuring their safety. Once informed about the extent of risk and safe procedures for their activities, all individuals working with hazardous chemicals must accept a shared responsibility for operating safely.
- Informing their supervisors of accidents and work practices or working conditions they believe are hazardous to their health or the health of others.
- Completing the designated training.
- Labeling containers.
- Knowing how and where to obtain an SDS.

### 3.6 Students

Responsible for:

- Adhering to all safety protocols and rules, including wearing appropriate personal protective equipment when engaging in or observing activities involving exposure to hazardous materials.
- Being responsible for ensuring a safe learning environment where physical well-being and educational pursuits are protected.
- Familiarizing themselves with the safety measures.
- Actively participate in safety training relevant to their courses or activities
- Immediately report any accidents or unsafe conditions to their faculty members.

### 3.7 Vendors and Contractors

Responsible for:

- Complying with all local, state, and federal safety requirements.
- Ensuring that all their employees working on LCC properties have been trained suitably.
- Coordinating activities and procedures with the facilities department, division, department, or program, providing oversight before work begins.
- Understanding the hazardous chemicals in the college area where they will be working.
- Understanding where applicable SDSs are located for each hazardous chemical their employees may be exposed to.
- Taking preventive measures to protect their employees under normal operating conditions and in foreseeable emergencies.
- Understanding the labeling used in the area of the college where they will be working.
- Eliminating hazardous chemical exposure to the LCC Community from their work when possible.
- Prior to starting their work, communicate hazardous chemicals that will be used during their work activity at the college.
- Posting the location of their SDSs in a visible place prior to starting their work activity at the college.
- Having copies of the SDSs onsite during the duration of the project.

### 3.8 Temporary Agency Employees

Responsible for:

- Follow the same requirements as employees.

## 4.0 Chemical Inventory

A chemical inventory of each hazardous chemical and SDS shall be maintained within each division, department, or program and be readily accessible to all affected LCC Community members. The chemical inventory must be updated annually or whenever new chemicals are introduced. The inventory will include the chemical or product name, the amount present, and the work area(s) where it is used. An electronic inventory can also be kept on a shared drive to allow access to other places across the college. Refer to [Appendix A](#) for an example.

## 5.0 Safety Data Sheets (SDS)

An SDS is written information about a specific hazardous chemical. SDSs are legally required to be issued for designated hazardous chemicals manufactured and distributed. The SDS will contain known safety information on the chemical or the product's hazards, which may contain more than one hazardous chemical. Supervisors or their designee of divisions, departments, and programs that have hazardous chemicals must also do the following:

- Designate where the SDSs for all hazardous chemicals will be kept.
- Ensure that SDSs are systematically organized.
- Obtain and maintain SDSs from the manufacturer or other sources.
- Properly fill out and display the required MIOSHA Right to Know poster. Supervisors or their designees are the parties listed as responsible on the forms. ([Appendix B - SDS Locator Poster](#))
- Post the notice of new or revised SDSs in their areas in the workplace five days after receipt and remain in place for ten days. ([Appendix B - New or Revised SDS Poster](#))

SDSs are not required for different applications. For further information, review the LCC Guide When SDSs Are Not Required.

## 6.0 Hazardous Chemical Evaluation

When the Chemical Inventory is created, and SDSs are obtained, the divisions, departments, and programs should:

- Review the supplier-supplied SDS
- Determine the **severity** of the hazards (Sections 2 and 9 of the SDS)
- Determine the usage of the hazardous chemical, including volume and frequency
- Evaluate if PPE will be required for use (Section 8 of the SDS)
- Verify that pictogram labels in Section 2 are present on the containers (see [Appendix D](#))

## 7.0 Labeling

The Right to Know Law requires labeling any container containing hazardous materials. Labels are to provide immediate information on the identity of a container's chemical constituents and the inherent danger. Ensure incoming bottles are appropriately labeled. If hazardous materials are transferred to secondary containers, ensure the container is labeled with the constituents and hazards, including acute or chronic and well-known hazards.

All labeling will be in conformance with Michigan Right-to-Know legislation and the following:

- Labels on incoming containers of hazardous chemicals may not be removed or defaced unless the container is immediately marked with all the required information.
- The labels on all containers will include:
  - The identity of the hazardous chemical(s), all hazardous chemical labels must be clearly legible
  - Appropriate hazard warnings or combination of words, pictures, and symbols that provide at least general information regarding the hazards of the chemicals and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards. The hazard warnings and information must also follow the labeling requirements of any substance-specific standards applicable to the chemical. For an example of labeling requirements, see [Appendix C](#).
- All secondary containers used should be labeled with the proper product identifier and information regarding the chemical's physical and health hazards. For examples of secondary container labeling, see [Appendix D](#).
- Building utility pipes will be labeled with the common name of their contents, for example, natural gas, steam, hot water, etc. The facilities department is responsible for maintaining these.

## 8.0 Training

All employees who work in areas where there is a possibility of exposure to hazardous chemicals during use or an emergency shall receive hazard communication training. Training must be provided during the initial assignment before beginning work and whenever a new physical or health hazard has been introduced into the work area.

Each division, department, or program ensures that initial and refresher training is conducted and documented for employees as required.

There are two different types of required employee training:

- A. Learning Management System (LMS) (this is assigned to all employees upon hire) training that includes the following:
  1. Overview of Hazard Communication Right-To-Know regulations, including employees' rights under the rules.
  2. How to read an SDS and use it to identify (at a minimum)
    - a. Physical and Health Hazards
    - b. First Aid Procedures
    - c. Protective Measures
    - d. Storage and Handling Procedures
    - e. Spill Response Procedures
- B. Division, department, or programs that have employees exposed to hazardous chemicals must conduct and document division, department, or program-specific training which will cover, at a minimum, the following:
  1. Location and availability of this written Hazard Communication Program and SDSs.



2. Methods and observations may be used to detect the presence or release of a hazardous chemical in the work area. Examples include air monitoring devices, visual appearance, or odor.
3. Hazardous materials inventory lists specific to the division, department, or program.
4. The physical and health hazards of the chemicals typically found in work areas.
5. How to read warning labels and identify the presence or release of hazardous materials.
6. Informing employees of the standard operating procedures for safe handling and disposal of any hazardous chemical with which an employee may come in contact.
7. Measures employees can take to protect themselves from hazards. Examples include appropriate work practices, emergency procedures, and personal protective equipment.
8. Emergency procedures for spills/accidents, including fire hazards, first aid, clean-up, disposal, and storm drain protection.
9. Ensuring that employees generating hazardous waste are adequately trained.
10. Location and how to use personal protective equipment, eye wash, showers, and portable fire extinguishers.

## 9.0 Non-Routine Tasks

A non-routine task is one that the LCC Community does not typically perform and for which they have not previously been trained.

Before beginning any non-routine task involving actual or potential exposure to hazardous chemicals, exposed LCC Community members will be informed of the hazards present and trained in appropriate work practices and the use of any necessary personal protective equipment. Required personal protective equipment will be provided to these individuals before starting the task. The supervisor will select personal protective equipment, clothing, and training related to non-routine tasks.

## 10.0 Employee-owned Chemicals

The LCC Community may not bring hazardous chemicals to LCC. Division, department, or program supervisors should take adequate steps to ensure the LCC Community does not bring hazardous chemicals into the workplace.

## 11.0 Recordkeeping

LMS training records will be maintained within the LMS system.

Each division, department, or program will maintain the most recent division, department, or program-specific training record for each affected employee for the duration of employment. The training record shall include the topics covered, the instructor's name, the training date, and the signature of each employee trained.

Divisions, departments, or programs will maintain SDSs for a minimum of 30 years after the last use of the chemical. SDSs for chemicals still in use or storage shall be replaced by updated sheets when they become available.

Each division, department, or program will conduct an annual Hazard Communication Program Evaluation ([Appendix E](#)) and maintain it for at least two years.

This document provides the minimum requirements for developing, implementing, and maintaining Lansing Community College's Hazard Communications program. Specifically, it details the safety control measures the college has implemented to protect employees, students, visitors, vendors, and contractors. Lansing Community College's Hazard Communication Program conforms to MIOSHA General Industry Safety And Health Standard Part 92 & 430: Hazard Communication and Lansing Community College Board of Trustees Policy 6.090.




## Chemical Inventory Example

[illegible]

## Appendix B:

### MIOSHA SDS Locator Poster –

Posted in communal areas where chemical products are used or stored.

<h1>This Workplace Covered by the Michigan Right To Know Law</h1> 	 <b>LARA</b> LICENSING AND REGULATORY AFFAIRS CUSTOMER DRIVEN. BUSINESS MINDED.				
<p>Employers must make available for employees in a readily accessible manner, Safety Data Sheets (SDS) for those hazardous chemicals in their workplace.</p> <p>Employees cannot be discharged or discriminated against for exercising their rights including the request for information on hazardous chemicals.</p> <p>Employees must be notified and given direction (by employer posting) for locating Safety Data Sheets and the receipt of new or revised SDS(s).</p> <p>When the employer has not provided a SDS, employees may request assistance in obtaining SDS from the:</p> <p>Michigan Department of Licensing and Regulatory Affairs Michigan Occupational Safety and Health Administration General Industry Safety and Health Division (517) 284-7750 Construction Safety and Health Division and Asbestos Licensing (517) 284-7680 <a href="http://www.michigan.gov/miosha">www.michigan.gov/miosha</a> MIOSHACET #2106 (Rev. 05/18)</p> 	<h2>SDS(s) For This Workplace Are Located At</h2> <table><tr><td>Location(s)</td></tr><tr><td>Location(s)</td></tr><tr><td>Person(s) responsible for SDS(s)</td></tr><tr><td>Phone</td></tr></table>	Location(s)	Location(s)	Person(s) responsible for SDS(s)	Phone
Location(s)					
Location(s)					
Person(s) responsible for SDS(s)					
Phone					


LARA is an equal opportunity employer/program.

Posted in areas where chemical products are used or stored.










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## Appendix C:

### Sample GHS (Globally Harmonized System) Label

<b>EPICHLOROHYDRIN</b> <b>1</b>	
UN No. 2023 CAS No. 106-89-8	
<b>2</b> <b>DANGER</b>	
<b>4</b> Flammable liquid and vapor. Toxic if swallowed. Toxic in contact with skin. Causes severe skin burns and eye damage. May cause an allergic skin reaction. May cause cancer.	
<b>5</b> Do not breathe dust/fume/gas/mist/vapors/spray. Wear protective gloves/protective clothing/eye protection.	
Fill Weight: 18.52 lbs. Gross Weight: 20 lbs Expiration Date: 1/15/2018	Lot Number: A0323111323 Fill Date: 1/15/2012
<b>6</b> JACKSON CHEMICAL COMPANY - City of Industry, Los Angeles, California, USA (800)-444-456-8989	

## Pictogram Labels

Hazard Symbols (to be used in pictograms for substances of the particular class)		
		
<b>FLAME OVER CIRCLE—USED FOR THESE CLASSES :</b> <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<b>FLAME—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Flammables</li> <li>▪ Self Reactives</li> <li>▪ Pyrophorics</li> <li>▪ Self-Heating</li> <li>▪ Emits Flammable Gas</li> <li>▪ Organic Peroxides</li> </ul>	<b>EXPLODING BOMB—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ Self Reactives</li> <li>▪ Organic Peroxides</li> </ul>
		
<b>SKULL &amp; CROSSBONES—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Acute toxicity (severe)</li> </ul>	<b>CORROSION—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Corrosives</li> </ul>	<b>GAS CYLINDER—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>
		
<b>HEALTH HAZARD—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Reproductive Toxicity</li> <li>▪ Target Organ Toxicity</li> <li>▪ Mutagenicity</li> <li>▪ Aspiration Toxicity</li> </ul>	<b>ENVIRONMENTAL HAZARD—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Environmental Toxicity</li> </ul>	<b>EXCLAMATION MARK—USED FOR THESE CLASSES:</b> <ul style="list-style-type: none"> <li>▪ Irritant</li> <li>▪ Dermal Sensitizer</li> <li>▪ Acute toxicity (harmful)</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritation</li> </ul>



## Appendix D:

Examples of secondary container labels

CHEMICAL NAME	
HEALTH	1
FLAMMABILITY	2
REACTIVITY	3
PERSONAL PROTECTION	A
HEALTH HAZARDS:	


Product ID: DIESEL FUEL

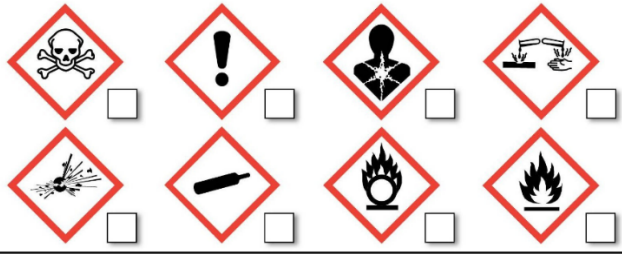
Signal Word:  
☒ DANGER  
☐ WARNING  
☐ N/A

HAZARD DIAMOND:  
HEALTH: 1  
FIRE: 2  
REACTIVITY: 3  
INSTABILITY: 0

Precautionary and Other Information: Keep away from heat. Keep container closed tightly.

PPE Code: 400



CHEMICAL NAME		See Safety Data Sheet
SIGNAL WORD Use Only One <input type="checkbox"/> DANGER <input type="checkbox"/> WARNING		
		
HAZARD STATEMENT		
PRECAUTIONARY STATEMENT		
reorder - 440.777.6660		GHS 5.0x6.0



## Appendix E:

### Hazard Communication Program Annual Review

## Hazard Communication Program Annual Evaluation

Evaluation completed by: \_\_\_\_\_ Date: \_\_\_\_\_

Division, department, or program evaluation completed for: \_\_\_\_\_

A review of the written program was conducted. \_\_\_\_ Yes \_\_\_\_ No

The following specific sections have been modified:

\_\_\_\_\_

A review of the inventory of hazardous chemicals was conducted. \_\_\_\_ Yes \_\_\_\_ No

All hazardous chemicals have been appropriately added to, archived, or have changed locations in the facility:

\_\_\_\_\_

A review of the available SDS was conducted. \_\_\_\_ Yes \_\_\_\_ No

Note any SDS not available:

\_\_\_\_\_

Was a review of labeling conducted? \_\_\_\_ Yes \_\_\_\_ No

Note any label deficiencies and corrective actions:

\_\_\_\_\_

A review of student and employee training was conducted. \_\_\_\_ Yes \_\_\_\_ No

Note any deficiencies:

\_\_\_\_\_

A review of the injuries/illness was conducted. \_\_\_\_ Yes \_\_\_\_ No

Any injuries/illnesses related to Hazard Communication:

\_\_\_\_\_