In the five years I have been traveling the great state of North Carolina and visiting all of your campuses, I have met some of the finest people, and toured some of the most amazing learning institutions in the world. It is both an honor and a privilege to take on the position as director of EHSI, and I look forward to fulfilling our role as an important component of the community college system.

Every year, we look for opportunities to increase the effectiveness of services available to each community college based on the findings of our inspections and feedback we receive from you. It is important to us that our efforts at each college provide a lasting benefit, and we strongly support the development of a positive safety culture that is apparent to employees and students the moment they arrive at your campuses.

While putting together a comprehensive community college safety management program is an important albeit daunting task, it will never evolve into a full-fledged safety culture without the support of all stakeholders including, most importantly, upper management. Management commitment is the single most important factor that will lead to the buy-in and behavioral changes that evolve into a positive safety culture. Without commitment from upper management, safety programs have a tendency to become nothing more than a notebook on a bookshelf.

There are some actions that Presidents and Vice Presidents can take that will begin the culture building process without ever having to look at OSHA requirements. Simply getting involved and expressing a sincere commitment to safety will encourage deans, directors and supervisors to make the same commitment. As faculty and staff adopt these same attitudes from their supervisors, a true safety culture begins to emerge. Because everyone takes some responsibility for maintaining a safe campus, the result will obviously be fewer accidents, but it doesn’t end there. Some of the proven side effects include increased job satisfaction, increased productivity and reduced employee turnover.

The following are some of the best opportunities for management to get involved in the safety management programs at their institutions:

- **Attend Safety Training** - Safety training is an important part of all safety management programs. By attending training with faculty and staff members, you are demonstrating your commitment to campus safety rules and willingness to set time aside for the safety program.
- **Attend Safety Committee Meetings** - This is the best way to get involved and find out what your committee members see as priorities for the continuous improvement of your safety program.
- **Participate in Safety Inspections** - By taking part in safety inspections, you not only get a chance to see through the eyes of

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Moving Forward (continued from page 1)

Developing a positive safety culture is a long-term effort and will not happen overnight. It is important to remain committed and hold the belief that a proactive approach to safety will not only provide a safe environment for our employees and students, but will also benefit the college as a whole. EHSI is proud to assist North Carolina Community Colleges achieve their safety goals and is willing to help any way we can. Please call (828) 694-1749 or email jamesmc@blueridge.edu if you would like to schedule training, inspections, or if you just have a question.

Chemical Secondary Container Labeling

In 2008, the Hazard Communication standard ranked second on the list of OSHA citations nationwide with a total of 6,662 violations. EHSI stresses the importance of complying with the hazard communication standard because it regulates one of the highest risk areas found at a community college, exposure to hazardous chemicals. One part of the standard where there are almost always problems is secondary container labeling. It is not uncommon, while doing a safety inspection, to find unlabeled spray bottles in custodian closets, improperly labeled jugs and cans in maintenance areas and insufficient labeling in science labs.

OSHA does not dictate the label format; so each school’s written hazard communication program is required to describe how secondary containers are to be labeled. There is no specific size or color requirement for the label. Colleges can design their own label or use one that is already available. But once chosen all secondary labeling on campus must conform to the same format. The label must remain legible and be prominently displayed on the container. The information on the label must include the identity of the chemical and the it’s hazard warning(s).

The name of the chemical can be the common or trade name or the chemical name. But the name listed on the MSDS, chemical inventory, and label should match. Hazard warnings might include “flammable” or “irritant.”

The NFPA (National Fire Protection Association) or HMIS (Hazardous Materials Information System) hazard warning indices are also acceptable. Both systems use a 0-4 index to rate the flammability (red), health (blue), and reactivity (yellow) hazards.

The difference is the NFPA index, developed for firefighters, assumes the chemical is being exposed to an active fire and the number, 0-4, reflects that. This is why on some MSDSs both NFPA and HMIS indices are listed and there are differences. So make sure you are using the matching index and label. EHSI recommends the HMIS system for container labeling and the NFPA system to warn of hazards in a building.

Each area of the campus that uses chemicals (custodial, maintenance, chemistry, etc.) should designate a responsible person to oversee the labeling along with MSDS files and chemical inventory for their area. This job is way too big for one person to be responsible for the entire campus. Each person’s duties should be listed in the written plan.

The last component of the Hazard Communication Standard is employee training. EHSI is ready and available to train college employees on the hazards, ways to protect themselves, and how to label secondary containers and use the MSDS. Contact your EHSI technician to schedule hazard communication training at your school.
An Environmental Management System

With the push to become “green” come many challenges. The issues are often complex and interdependent, and knowing where to begin is often not as easy as it might appear. Industry has for many years now understood the value of a well planned system or plan to achieve a high state of environmental consciousness. Hazards are reduced, money is saved, a reputation of caring is created, environmental compliance is attained, and in the end, the environment and our health is better off for it. A prevalent system used by industry is ISO 14000. This system has five core principles: commitment and policy, planning, implementation and operation, checking/corrective action, and review and improvement. These are certainly not new concepts and work well for many management systems. The policy must contain, at a minimum, the commitment to continual improvement, pollution prevention, compliance with regulations, and compliance with other requirements. After the policy is developed the facility identifies aspects and impacts, that is any element of an organization’s activities, products or services which can interact with the environment and its effect. For example, the storm water runoff from your parking lot would be an aspect that has the impact of adding petroleum contaminants to surrounding streams. This step is extremely important and can help guide the institution in selecting impacts it has control over and prioritizing the aspects to begin studying and altering. Many industries start either by department or by the environmental media that may be affected such as air, water and soil. After aspects and impacts have been identified and prioritized, planning begins by identifying the specific goal, target, unit to measure, departments involved, responsible person, resources needed, budget, and of course, a schedule. Procedures are then created to reach the goal. After implementation, follow-up is necessary to track attainment of the goal, and corrective action made if needed. Finally, the review team responsible assesses success and changes policy and procedures as necessary.

Keep in mind that the path to sustainability is a long, winding road. Persistence, in this case, is extremely important. Not only must procedures change but a whole way of doing things. In the end we’ll all be better for it. For more information, please contact me or your designated EHSI Specialist.

By James Hutcherson
Endowed Chair of Sustainability and Environmental Science Technology at Blue Ridge Community College

Hazcom’s Total Makeover – Part 1

If you felt the earth move recently it may have been due to the shifting of the tectonic plate commonly known as OSHA. It occurred in September when OSHA proposed a modification to the Hazard Communication Standard (HCS) known as the Globally Harmonized System of Classification and Labeling of Chemicals, or GHS. But calling it a modification would be like suggesting that the replacement of a VW bug’s stock engine with a 396-cubic-inch, 425-hp Mark IV big-block engine is also just a modification. At first glance it may look no different, but once you look under the hood its obvious that there has been a major overhaul.

As with any change, you can expect there to be good news and bad news. The bad news is OSHA has introduced a host of new terms, added more requirements, and adopted several new procedures. The good news is that very few of the changes will alter the way you do business – how you manage MSDSs or provide training, for example. But the changes are noteworthy and, in some instances, detailed and counterintuitive. Therefore, the aim of this article is to provide a broad-brush overview of the new GHS requirements as they apply to community colleges.

From its inception 26 years ago there have been three core elements of a hazcom program: container labels, material safety data sheets (MSDSs), and employee training. And to implement the program, a knowledge of which items are covered by the standard is a prerequisite.

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The Environmental Health and Safety Institute is proud to welcome David Martin to our staff as a Health and Safety Specialist. He has been with EHSI since 2007 as a safety trainer for our continuing education classes. Dave received his BSME from Oklahoma University in 1971. He has worked in industry for 30 plus years in Environmental Health and Safety and Facilities Engineering. Dave worked for Danaher Controls in Elizabethtown, NC for 18 years. Dave and his wife Jackie relocated to the Henderson/Buncombe county area in 2006 where he began working part time at BRCC. Dave and Jackie have two children, Kimberly and Michelle. They enjoy traveling along and around the Blue Ridge Parkway and planting flowers and shrubs around their house. Please join us in welcoming David to our team!

EHSI Welcomes David Martin

The adjustments OSHA has made to the definition of what GHS covers is premature, but an introduction to some new terminology is not. Currently, an HCS-covered item is referred to as a “hazardous chemical.” In GHS-speak, a regulated item will be called either a hazardous “substance” or a hazardous “mixture.” Hazardous chemical will then morph into a generic term to mean any regulated substance or mixture. These are the most basic GHS terms, and the next issue of Safety Measures will provide further exposure and insight into new and important terminology.

- **Labels** - The rules for an HCS-labeled container are rather open-ended. A label must show chemical identity, manufacturer name and address, and appropriate hazard warnings (which allows for a wide spread of interpretation). A GHS label will have to include six basic elements The language used for the hazard statements, precautionary statements and signal words will be drawn from a set of standardized verbiage mandated by OSHA.

- **MSDSs** - Under GHS rules, the MSDS will be a thing of the past. Or, at least the acronym will be. In the future, the document will be called a Safety Data Sheet, or SDS. Whoop-dee-do, you say? Wait, there’s more. OSHA intends to standardize the document’s format with 16 sections in a prescribed order. Furthermore, they have spelled out the specific type of information that must be included in each section.

- **Training** - There are only two differences between the HCS and GHS training requirements. First, if the regulations go into effect as currently written, you will have a 2-year window to retrain your employees. Second, your hazard communication training program will have to include an explanation both of the GHS labeling requirements and the format of the SDS (as well as how to use the information).

While this change to the HCS clearly constitutes a significant overhaul, the view provided by this summary will enable you to understand how all of GHS’ many pieces interlock. Not to mention that it will move you one step closer to completing your GHS training.