

Hazard Communication Plan

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Scope

This **Hazard Communication (“HazCom”) Plan** is required by the Occupational Safety and Health Administration’s (OSHA) *Hazard Communication Standard* (29 CFR 1910.1200). The General HazCom Plan covers all College of Southern Nevada (CSN) employees, including staff, faculty, as well as any other parties that work with chemicals and/or may be exposed to the effects of such chemicals at CSN. Department-specific HazCom Plans are also to be incorporated into the overall plan, as needed (Appendix B). The scope includes all facilities owned or operated by CSN.

Purpose

The purpose of this HazCom Plan is to ensure that all persons who handle, use or store chemicals in the workplace are familiar with the hazards associated with such chemicals. They shall be also be advised of methods that may be used to reduce the risk of accidents or illness resulting from the use of hazardous materials. This information shall be communicated to all personnel by various means, including (but not limited to):

- Maintenance of accurate chemical inventories in each work area
- Utilization of proper chemical labeling.
- Material Safety Data Sheets (SDSs), which contain detailed hazard information on each chemical product. SDSs shall be available for all chemicals used or stored at CSN.
- Employee training regarding the General HazCom Plan, department/program-specific HazCom Plans, chemical hazards, protective measures, and emergency procedures.

Responsibilities

The College President has been granted the authority and responsibility for institutional level health and safety planning by the NSHE Board of Regents.

The CSN Director of Environmental Health & Safety is responsible for developing, reviewing, updating and overseeing implementation of the HazCom plan. This includes activities such as acting as a consultant/resource for departments and programs within

the College regarding implementation and enforcement, evaluating work practices and

use of personal protective equipment (PPE), providing relevant safety program materials, providing and documenting related training, recommending environmental monitoring and response actions, and coordinating any compliance activities, as appropriate.

Division Deans and department/program Directors are ultimately responsible for compliance with HazCom requirements within their functional units, and for coordination with the CSN Department of Environmental Health & Safety, regarding compliance with the plan. Responsibility for compliance with all HazCom programs shall not be delegated to unqualified personnel.

Supervisors and Managers are responsible for ensuring that all requirements of the HazCom plan that apply to their functional work areas are carried out properly. Responsibility for ensuring adherence to the HazCom plan shall not be delegated to non-management personnel without prior consultation with Environmental Health & Safety.

Supervisors, with assistance from Environmental Health & Safety, shall ensure that all appropriate personal protective equipment (PPE) is available to employees, shall review safe work practices with their employees and, if necessary, post signage in appropriate areas to indicate the hazards and to limit access if necessary.

Each functional work area shall have a responsible (managerial) person designated to:

- Ensure that the HazCom plan is followed in their work area.
- Conduct chemical inventories and update the chemical inventory in their work area as needed (Environmental Health & Safety is available for assistance).
- Maintain SDSs for all chemicals in their work areas, and ensure their availability to employees and students.
- Review and update any site specific HazCom information annually, at a minimum, or more frequently as needed.
- Ensure that appropriate safety training is conducted for all employees within the functional work unit

Outside Contractors

Contractors conducting any work on the premises of any CSN facilities shall provide the Department of Environmental Health & Safety with an inventory and copies of SDS(s) for all chemicals and/or hazardous materials being brought on CSN campuses or other facilities. Upon completion of its work, the Contractor shall be responsible for removal of any chemicals and/or hazardous materials brought onto CSN premises This

requirement shall be incorporated into all appropriate contracts

The Contractors are to provide a copy of their HazCom Plan to CSN Environmental Health & Safety prior to commencement of work involving the use of chemical products on campus.

Environmental Health & Safety will provide the necessary information on the chemicals and/or hazardous materials to which the Contractor or their employees may be exposed while working in areas of the College where CSN chemicals and/or hazardous materials may be stored or used. A copy of the College Hazard Communication Plan will be provided to Contractors upon request.

Hazard Communication Methods

A. Chemical Inventories

1. All work areas will keep a current and up-to-date chemical inventory of chemicals used or stored.
2. Inventories will be updated as materials, or operational processes change.
3. The information will include: The name of the chemical (as it appears on the SDS); quantity on hand; and if the SDS is on file. Use the inventory form in Appendix A.
4. The inventory from each work area shall be provided to CSN Environmental Health & Safety for incorporation into a College-wide chemical inventory/recordkeeping system.

B. Container Labels

1. All chemicals shall be stored in original containers, when feasible, with the manufacturer's label attached. All labels, including secondary containers, shall include, at a minimum, the chemical or trade name of the product, the name and address of the manufacturer, and a statement of health/target organ effect (e.g., "skin irritant").
2. Small quantities intended for immediate use may be placed in a container without a label, provided the individual using the unmarked container keeps it in their possession continuously, and the product is entirely used up during the work shift or properly disposed of by the end of the work shift.

3. Proper labels are to be maintained on all containers. In the event a label may be damaged, removed, or unreadable, the container must be relabeled immediately with the contents of the container, and the manufacturer's name and address and a statement of health effect of overexposure. The SDS will be consulted to aid in correct and complete labeling.
4. **Unmarked containers** will be brought to the attention of the appropriate CSN Supervisor or Environmental Health & Safety and **may not be used until properly labeled.**

C. Material Safety Data Sheets (SDSs)

1. SDSs shall be available to all employees, at the work site
2. Whenever chemicals are ordered, whether for restocking or new procurement, the SDS shall be requested on the purchase order.
3. The SDS for restocked chemicals will be reviewed against SDS on file for any information change. If there is a change in information (e.g., newer date), the most current SDS will be copied, filed onsite as required (the previous SDS may be sent to Environmental Health & Safety for archiving).

All chemical product purchases, regardless of quantity or nature of hazards, shall include provision of a product SDS, and copies will be provided, when received, to the work area, and to Environmental Health & Safety, so that the master files/inventories may be kept current. Employees or students shall not bring their own chemical products on to campus facilities without prior consultation/approval from CSN Environmental Health & Safety.

D. Employee Training

1. Employee HazCom training will be conducted annually, at a minimum, or more frequently as needed.
2. New employees will be given HazCom information as part of their initial orientation and indoctrination.

Employee training will consist of, but not be limited to:

- Goals and provisions of the "Right-to-Know" laws/OSHA *Hazard Communication Standard*.

- Definitions of, types, and characteristics of hazardous agents.
- Identification of hazardous materials.
- Chemical products and processes.
- Type of information available on a product Material Safety Data Sheet (SDS)
- Appropriate work practices, personal protection methods, exposure limits, handling spills/waste disposal.
- Emergency procedures involving hazardous materials.

Non-routine Tasks

Supervisors shall inform employees or students of any special tasks which may involve hazardous materials. The supervisor and other affected personnel will review the SDS and follow all recommended procedures in order to minimize any chemical exposure.

Supervisors, with assistance from Environmental Health & Safety, will ensure that all appropriate personal protective equipment (PPE) is available, review safe work practices with all involved employees and, if necessary, shall post appropriate signage in the work area to indicate the nature of the hazard(s) and to limit access.

Emergency Procedures

In the event of a hazardous material(s) spill or release:

- Evacuate the immediate area. But remain in a location where you may safely direct emergency responders to the problem area.
- Report any spill or release to CSN Police (**Public Safety**) at **651-7911** and to Environmental Health & Safety (**651-7445**), as well as to the appropriate work area Supervisor at the earliest opportunity.
- Avoid contact with the spill, unless appropriate PPE is available and used, and you have been trained on its usage.
- Control the spill only to the level of your training. If untrained/unqualified, do not expose yourself to the chemical/substance. Leave it for qualified personnel.

In the event of a suspected overexposure to a hazardous substance:

- Seek medical attention immediately. **Call 9-911** if unsure of severity.
You may utilize any appropriate medical care provider initially, but any subsequent utilization of health care should be coordinated with the NSHE Worker's Compensation office. Be sure to inform the health care providers that the illness or injury may have been sustained in the workplace.
- Report the incident to the department/program supervisor.
- Supervisors are to notify CSN Environmental Health & Safety and CSN Human Resources as soon as possible. A C-1 Workers Comp form should also be submitted as soon as possible.
- All reports of exposure to chemical/hazardous substances must be kept on file for at least 30 years and made available to the employee on request.

Appendix A

Chemical Product Inventory Form (sample)

Page _____ of _____ Date _____

Campus _____

Department _____ Building _____ Room# _____

Name of (work area) responsible party/Supervisor _____

Completed by (Signature) _____

PRODUCT NAME (Chemical or Trade Name)	MANUFACTURER (Name and Address)	QUANTITY	SDS AVAILABLE? (Y/N)	SDS Date and Location

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Appendix B

Department or Site-Specific HazCom Information

To incorporate site-specific data into the *Hazard Communication (HAZCOM) Plan*, the responsible party for the department, program or other functional unit shall fill in and maintain/update this form.

Date: _____ Department: _____

Section/Building: _____ Area/Room Number: _____

Responsible Party: _____

Material Safety Data Sheets (SDSs) are accessible at/by: _____

SDSs and chemical inventories are considered records of potential exposure. These records must therefore, under OSHA regulations, be maintained for a minimum of 30 years following the last product usage.

Emergency Procedures (departmental-specific) –describe:

Location of Nearest First Aid

Kit: _____

Location of Eye Wash: _____

Location of Emergency Shower: _____