# Risk Management and Safety (RMS) Hazard Communication Program

**December 1, 2009**

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<th>Prepared By:</th>
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<td>Bill Murray</td>
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<td>Occupational Safety Program Officer, RMS</td>
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<td>Karl Reynolds, Director</td>
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<td>Bob Batten, Chief Engineer</td>
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<td>Thomas &amp; Mack Center</td>
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<td>Jeffrey Chaffant, Stadium Manager</td>
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<td>Tim Robitz, Executive Director</td>
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<td>Johnny Centineo, Executive Director</td>
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<td>Risk Management and Safety</td>
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A. SCOPE AND APPLICATION

The purpose of this Written Workplace Safety Program (WWSP) is to establish the minimum requirements and procedures for informing employees of the hazards associated with chemicals to which they may be exposed. This includes chemical usage during normal activities as well as unanticipated spills, leaks, and foreseeable emergencies.

Mission/Goal Statement – The mission of the UNLV Risk Management and Safety (RMS) Department is to provide assistance and guidance for the development, implementation, and monitoring of departmental policies and procedures. The goal of the department is to protect the staff, students, visitors and the institution from injury and/or financial loss.

B. COMPLIANCE WITH PROGRAM

All UNLV employees and private contractors are required to comply with the program elements described herein. This program is based in part upon the elements of the following references:

(1) 29 CFR 1910.1200 – Hazard Communication

(2) Nevada Administrative Code (NAC) 618.538 – Establishment of Written Safety Program

(3) UNLV Industrial Hygiene Plan

C. HAZARD DETERMINATION

UNLV relies on hazard evaluations performed by manufacturers and suppliers of chemicals as provided on the MSDS and product labels. Industrial hygiene sampling may be performed by RMS for particular chemicals and/or work processes. Specific controls will be based on analytical results. Refer to the Industrial Hygiene Plan posted on the RMS website.

D. DEFINITIONS

(1) Foreseeable Emergency – Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control
equipment which could result in an uncontrolled release of a hazardous chemical in the workplace.

(2) **Hazardous Chemical** – A chemical that is a physical or health hazard.

(3) **Hazard Warning** – Any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical and health hazards, including target organ effects, of the chemical(s) in the container.

(4) **Health Hazard** – A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.

(5) **Immediate Use** – The concept that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work-shift in which it is transferred.

(6) **Label** – Any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

(7) **Material Safety Data Sheet (MSDS)** – Written documentation of a chemical prepared in accordance with 29 CFR 1910.1200.

(8) **Physical Hazard** – A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, and organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

(9) **Primary Container** – The pre-labeled container purchased from the manufacturer.

(10) **Secondary Container** – The container used when an employee transfers a hazardous chemical from its primary container.

(11) **Work Area** – A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

(12) **Workplace** – An establishment, job site, or project, at one geographic location containing one or more work areas.

E. **DUTIES AND RESPONSIBILITIES**

(1) **Risk Management and Safety (RMS)**
a. Develop, implement, and maintain a written Hazard Communication Program that complies with the requirements of federal, state, and local regulations.

b. Compile and maintain a chemical inventory for all UNLV properties. Refer to the Chimera Website (https://rms.unlv.edu/chimera/) to access the chemical inventory program.

c. Maintain a database of Material Safety Data Sheets (MSDSs) for all hazardous chemicals used at UNLV. Refer to the RMS website (https://domdoc1.nevada.edu/ehs/msds) to access MSDSs.

d. Provide initial Hazard Communication safety training as part of the New Employee Orientation for those employees who could be exposed to hazardous chemicals as part of their projected duties.

e. Process and distribute hazardous chemicals as they are received on campus.

(2) Departmental Managers and Supervisors

a. Attend initial Hazard Communication safety training as part of New Employee Orientation.

b. Ensure the employees under their supervision attend initial Hazard Communication safety training.

c. Ensure that MSDSs are readily available during each work shift for employees when they are in their work areas. This is accomplished by providing computer access to the RMS website and informing employees that a disc is available where hard copies of each MSDS may be obtained.

d. Provide area-specific hazard chemical information for all employees whose job assignments involve the use of hazardous chemicals.

e. Provide training to employees assigned to non-routine tasks that could potentially expose them to hazardous chemicals. Topics shall include the potential hazards involved with the task and the proper procedures for conducting the task.

f. Notify RMS of changes of materials and/or processes within their area of responsibility.
g. Ensure that available engineering controls are in good working order and are used properly.

h. Ensure that personal protective equipment is available and used when required.

(3) **Affected Employees**

a. Attend Hazardous Communication safety training at the time of their initial assignment.

b. Know where to find a copy of the UNLV written Hazardous Communication Program.

c. Know how and where to access the UNLV MSDS database and disc (for hard copies).

d. Read, understand, and follow warning labels on hazardous material containers.

e. Read and understand the contents of MSDSs for the materials in use or stored in their work areas.

**F. CONTRACTORS**

Contractors who work on UNLV property shall:

(1) Submit a copy of their company Hazard Communication Program to the appropriate project manager.

(2) Ensure that copies of MSDSs are available for all hazardous chemicals used while working on UNLV property. The contractor shall maintain copies at each job site.

(3) Ensure that all containers have proper labeling per OSHA requirements.

**G. EMPLOYEE TRAINING - INITIAL**

(1) All affected employees shall receive information and training before assignments involving hazardous chemicals or processes. Information shall include, but not be limited to:

a. How to access the Hazard Communication program and applicable regulatory standards.
b. An explanation of the labeling system and MSDSs and how employees can access this information.

c. Information on how to detect the presence of hazardous chemicals in the work area.

d. Measures employees must take to protect themselves for site-specific hazards to include work practices, personal protective equipment, and engineering controls.

H. RECORDS MANAGEMENT

(1) Training materials will be maintained by the RMS Safety Training Officer.

(2) Individual employee training records (hard copies) will be maintained by the RMS Safety Training Officer for three years.

(3) MSDSs will be maintained indefinitely by the Chemical Inventory division of RMS.

I. NOTE

(1) OSHA is proposing to modify the current Hazard Communication Standard (HCS) to align with the provisions of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). RMS shall prepare and addendum at the appropriate time to describe how our program will be modified to meet the pending revised OSHA standard.

Prepared by Risk Management and Safety
895-4226