



HAZARD COMMUNICATION PROGRAM March 2014

A. SCOPE AND APPLICATION

The Hazard Communication Program is established in accordance with 29 CFR 1910.1200, "Hazard Communication," and describes the required program elements to prevent exposures that result in injury and/or illness; and to comply with all applicable state health and safety rules.

B. COMPLIANCE WITH PROGRAM

This procedure applies to all UNLV employees, designated volunteers, and multi-employers who works with and/or stores chemicals at UNLV. The written program is available for review at the Occupational tab on the UNLV Risk Management and Safety website.

Employees are defined as those who are filling a position in one of the following categories: academic faculty, administrative faculty, clinical faculty, adjunct faculty, classified employee, student employee, graduate assistant, postdoctoral fellows, paid residents, and designated volunteers.

C. DUTIES AND RESPONSIBILITIES

(1) Risk Management and Safety (RMS)

- a. Establish the Hazard Communication Program for UNLV.
- b. Process and distribute routine hazardous chemical deliveries to the campus.
- c. Serve as a resource for departments when evaluating non-routine tasks.

(2) Departments

- a. Ensure employees and student workers have completed required training.

- b. Provide information to employees as specified in section I (6) of this procedure.
- c. Notify RMS when there are material or process changes occurring within their area of responsibility.

(3) **Employees and Student Workers**

- a. Complete required training.
- b. Wear all personal protective equipment properly.

D. INVENTORY

- (1) RMS performs an annual inventory of all buildings on campus.
- (2) Results of the inventory are posted to the Chemical Inventory Management & Electronic Reporting Application (CHIMERA) database.
- (3) The database is available on the UNLV Risk Management and Safety website.
 - a. Located at the Chemical Inventory tab.
 - b. Inventory is searchable by building and room location.

E. SAFETY DATA SHEETS

- (1) Chemical Inventory staff members check that Safety Data Sheets (SDS) is available for all chemicals currently in the inventory.
- (2) SDS can be accessed at one of three locations on the RMS website:
 - a. Clicking on the "Search for a MSDS" icon on the home page.
 - b. Clicking on the MSDS link under the Chemical Inventory tab.
 - c. Logging into CHIMERA.
- (3) A CD is created annually and provided to departments whose employees may not have the capability of accessing SDS on line.
- (4) Employees who bring in chemicals from off campus are required to provide their supervisor with a copy of the SDS for these chemicals.

- (5) All employees have a responsibility to read, understand, and follow the instruction on warning labels and SDS for hazardous materials.

F. CONTAINER LABELING

- (1) The RMS staff will evaluate chemical labeling on campus:
 - a. When processing hazardous chemical deliveries to the campus.
 - b. During the annual chemical inventory.
 - c. When reports indicate that problems exist with the proper handling, use, or storage of chemicals.
 - d. During routine RMS inspections.
- (2) The labeling system used at UNLV will be the original primary container labeling.
- (3) Each department will apply labeling to the containers they will be using. Labels will:
 - a. Contain appropriate chemical identification and hazard warnings.
 - b. Be firmly affixed to containers during use.
 - c. Be completely readable to avoid misunderstanding of the information listed.
- (4) No containers will be used at UNLV until the procedures listed in this section have been followed.
- (5) Portable containers under the exclusive control and immediate use by an employee do not require labeling as long as the following conditions are met:
 - a. Employee transfers the chemical directly from the primary container.
 - b. Portable container is under their exclusive control.
 - c. The chemical is used entirely by the end of the project or end of shift.

G. ENGINEERING CONTROLS

- (1) Engineering controls will be the primary means to eliminate or minimize hazardous conditions generated from the use of chemicals on campus.
- (2) Departments will instruct employees on the proper use of engineering controls.
- (3) Employees will follow this instruction to ensure that engineering controls are used correctly.
- (4) Each department using engineering controls will:
 - a. Ensure the equipment is checked for proper operation prior to use.
 - b. Establish a method for reporting deficiencies for correction.
 - c. Secure equipment with deficiencies from use by appropriate means, such as lockout/tagout, until servicing or repairs are completed.
 - d. Inform department employees about the status of equipment that is taken out of use.

H. PERSONAL PROTECTIVE EQUIPMENT (PPE)

- (1) PPE will be used when engineering controls fail to provide the needed level of protection from chemical exposure.
- (2) Departments will provide PPE at no cost to employees and ensure employees know how to use it properly.
- (3) Employees will inspect PPE prior to use and then use it properly while working with chemicals.

I. EMPLOYEE INFORMATION AND TRAINING

- (1) RMS will develop and offer training to all employees on the requirements of this plan.
- (2) Hazard Communication (HazCom) awareness training will be provided in the classroom as part of New Employee Orientation, or
- (3) On-line through the RMS website by clicking on the "Training" and "Online Training" tabs.

- (4) The awareness training will include the following:
 - a. Overview of HazCom requirements.
 - b. Determining the presence of chemicals in the work place.
 - c. Reducing exposure to chemicals.
 - d. Accessing SDS and the written UNLV HazCom program.
 - e. Reading labels and reviewing SDS to obtain hazard information.
- (5) RMS will maintain course completion records of all training completed.
- (6) Before assuming work responsibilities, departments are responsible for providing their employees with area-specific hazard chemical information to include the following:
 - a. Physical and health risks from exposure to the chemicals.
 - b. Symptoms of over exposure and the specific steps the department has taken to reduce or prevent exposure.
 - c. The hazardous properties of chemicals added to the inventory and the protection specified to eliminate any hazardous conditions.
 - d. Document the instruction required by this section using the form located at Appendix A.

J. HAZARDOUS NON-ROUTINE TASKS

- (1) Departments will evaluate the processes occurring within their area of responsibility to determine any hazardous non-routine tasks that are performed.
- (2) This evaluation will occur, as necessary, to keep the list of non-routine tasks updated.
- (3) Once the tasks have been identified, departments will ensure:
 - a. Employees receive appropriate information on the non-routine tasks they will be asked to perform.
 - b. Employees are made aware of the chemicals used and how to protect themselves from any hazards encountered.

K. MULTI-EMPLOYER WORK PLACE

- (1) Departments will provide the following information to contractors/vendors:
 - a. Hazardous conditions that contractor/vendor employees may be exposed to at UNLV.
 - b. How to protect their employees from these conditions.
 - c. How to access the SDS for the chemicals used at their work location.
 - d. Information on the precautionary measures needed to protect their employees.
 - e. Labeling system used to identify hazardous chemicals.
 - f. Steps to be taken during emergency situations.

- (2) Contractors/vendors will:
 - a. Provide copies, as needed, of the SDS for the chemicals they will use or store while at UNLV.
 - b. Ensure that all containers brought on campus have proper labeling per OSHA requirements.
 - c. Provide appropriate protective equipment to their employees.
 - d. Ensure their employees follow the specified safety procedures for the job tasks performed.

L. APPENDICES

- (1) Appendix A – “Hazardous Chemical Information Training”

Appendix A Hazardous Chemical Information Training



Hazardous Chemical Information Training

Training Attendance Sheet

Supervisor Name: _____

Date: _____ Time: _____ Location: _____

- Training Outline:
- Location of written Hazard Communication Program
 - Contents of a Safety Data Sheet (SDS) and location of the SDS Library
 - Hazardous Characteristics of Chemical and Required Personal Protective Equipment (PPE)
 - Warning Signs and Labels

Employee Name	Job Title	Signature
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____
6. _____	_____	_____
7. _____	_____	_____
8. _____	_____	_____
9. _____	_____	_____
10. _____	_____	_____

This is to certify that the persons above have acknowledged receipt of information and training in Hazardous Chemical Information training.

Supervisor's Signature

Supervisor's Job Title

Date