

 CSN Procedure	Facilities Management
Category: Environmental Health and Safety	Effective Date: 02/09/2022
Hazard Communication Plan	

1.0 SCOPE

This *Hazard Communication Plan* is required by the Occupational Safety and Health Administration's (OSHA) *Hazard Communication Standard* (29 CFR 1910.1200). This Hazard Communication 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.

EXCLUSIONS

While OSHA has a broad definition of a chemical substance, there are certain categories of chemicals that are not covered by the standard. Provisions of this Plan do not apply to the following:

- Use of hazardous chemicals in laboratories is covered by the CSN Chemical Hygiene Plan.
- Hazardous waste regulated under the Federal Resource Conservation and Recovery Act.
- Wood or wood products. NOTE: Wood treated with hazardous chemicals and wood dusts are not exempt.
- Articles that are formed to a specific shape or design during manufacture, that have end use functions dependent in whole or in part of its shape or design during end use, and that does not release or otherwise result in exposure to a hazardous chemical under normal conditions of use (e.g., tires, PVC piping).
- Any drug as defined in the Federal Food, Drug, and Cosmetic Act when it is in solid, final form (no alteration or preparation required prior to administration).
- Any consumer product (e.g., pens, printer toner, etc.) or hazardous substance if the product is used in the workplace in the same manner as normal consumer use and if the use results in a duration and frequency of exposure that is not greater than exposures experienced by consumers.
- Labeling of pesticides that are covered by labeling requirements of the Federal Insecticide, Fungicide, and Rodenticide Act.
- Labeling of medical or veterinary devices or products that are covered by labeling requirements of the Food and Drug Administration or Department of Agriculture.
- Ionizing and non-ionizing radiation, and radioactive waste*.
- Biological hazards*.

*Other policies, procedures, and programs apply at CSN.

2.0 PURPOSE

The purpose of this 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 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.
- 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 Hazard Communication Plan, chemical hazards, protective measures, and emergency procedures.

3.0 RESPONSIBILITIES

3.1 Environmental Health & Safety Department

CSN Environmental Health and Safety (EHS) is responsible for developing, reviewing, updating, and overseeing implementation of the Hazard Communication Plan. This includes activities such as acting as a consultant/resource for departments and programs within the College regarding the implementation and enforcement, evaluating work practices 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.

3.2 Deans and Department/Program Directors

Division Deans and Department/Program Directors are responsible for compliance with Hazard Communication requirements within their functional units, and for coordination with the CSN Department of Environmental Health & Safety, regarding compliance with the plan.

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

- Ensure that the Hazard Communication 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 hazard communication information annually, at a minimum or more frequently as needed.

- Ensure that appropriate safety training is conducted for all employees within their functional work unit.

3.3 Supervisors and Managers

Supervisors and Managers are responsible for ensuring that all requirements of the Hazard Communication Plan that apply to their functional work areas are carried out properly. Responsibility for ensuring adherence to the Hazard Communication 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.

3.4 Employees

Employees are responsible for protecting themselves against injury from hazardous chemicals and follow directions for use of hazardous materials, including familiarizing themselves with the contents of the appropriate Safety Data Sheets (SDS) prior to using any chemical.

4.0 EMPLOYEE TRAINING

All CSN employees who work with or may be exposed to hazardous chemicals will receive initial training as part of their initial orientation through the CAPE online learning system. Additional training will be provided by the division/work group whenever new chemicals or new hazards are introduced into the workplace.

Supervisors will provide training to new employees on the safe use of chemicals in their workplace. Safe use practices will be completed prior to the employee being exposed to any hazardous chemical.

Hazard communication training for employees shall include:

- 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 Safety Data Sheet (SDS)
- Appropriate work practices, personal protection methods, exposure limits, handling spills/waste disposal.
- Emergency procedures involving hazardous materials.

5.0 OUTSIDE CONTRACTORS

Contractors conducting any work on the premises of any CSN facilities shall provide 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.

Contractors are to provide a copy of their Hazard Communication 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 to while working in areas of the College where CSN chemicals and/or hazardous materials may be stored or used. A copy of the CSN Hazard Communication Plan will be provided to Contractors upon request.

6.0 PROCEDURES

6.1 Chemical Inventories and Safety Data Sheets

An electronic online library is available to employees through the CSN Environmental Health and Safety website to provide access to a list of hazardous materials and SDS's that are located at all CSN facilities. This online library will serve as the primary list of hazardous materials located at all CSN campuses and is updated when new Safety Data Sheets are received. Access to the database is through MSDSONline system at: <https://chemmanagement.ehs.com/9/38af4f49-b93c-46ce-a46f-3944e8d27fde/msdsonline-search>.

In addition, all work areas will keep a current and up-to-date chemical inventory of chemicals used or stored. Inventories will be updated as materials, or operational processes change. 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. The inventory from each work area may be incorporated into the electronic online library by the CSN Environmental Health & Safety Department.

Safety Data Sheets are fact sheets for chemicals that may pose a physical or health hazard in the workplace. They provide CSN employees with specific safety information about chemicals used in the workplace. The information contained in a Safety Data Sheet presents the information in a standard sixteen section format and the most important information is listed first.

An SDS can be found by searching in the electronic online library for the product name, product code, manufacturer, or product CAS# and click the "Hourglass" button to find an SDS. An SDS can also be found for a chemical located in a specific room or building. Instructions on how to use the electronic online library can be found in Appendix A.

6.2 Container Labels

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"). Labels must be legible and prominently displayed

on the container, though the size and colors may vary. The chemical identity on the label must be the same as the chemical identified on the SDS.

Small quantities intended for immediate use may be placed in a secondary 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, returned to the primary labeled container, or properly disposed of by the end of the work shift.

All labels must be maintained in a readable condition. Damaged labels or labels lacking the appropriate information should be reported to their Department Supervisor, or EH&S representative immediately and new labels procured. Hazard warning labels, tags, or markings on containers may not be removed or defaced unless a new label or marking with the appropriate information is immediately replaced or attached.

All areas and classrooms storing hazardous chemicals greater than the Maximum Allowed Quantity per Control Area listed in the International Fire Code (IFC) Section 5001.1, must be labeled using the NFPA 704M Hazard Identification Labeling System. Shipping containers such as boxes, carboys, tanks, cylinders, or drums labeled using the DOT hazard classification labeling system according to 49 CFR Part 173 shall not be removed from the container if any product remains in the container.

6.3 Non-routine Tasks

Supervisors shall inform employees of any special tasks which may involve a hazardous material. The supervisor and other affected personnel will review the SDS and follow all recommended procedures 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.

6.4 Chemical Purchasing Guidelines

Divisions, Departments, and Programs will, on occasion, make purchases of chemicals requiring an SDS. New chemical purchases must be approved by the CSN Environmental Health and Safety Director. A *New Chemical Approval Form* (see Appendix B) must be sent to the CSN EHS Director along with the SDS for each chemical for review/approval prior to completing the purchase requisition. The form will be returned promptly to the sender indicating 'approval' or 'disapproval' along with a short explanation, if the request is disapproved. Copies of approved requests should be kept on file by the initiator.

In addition, once a chemical is purchased, the purchaser must first check to see if the material is already listed in their location's eBinder inventory in the MSDSOnline system. If it is not listed, the chemical and its associated SDS must be added to their location's eBinder inventory. Instructions on how to view and add a new SDS in a location's eBinder on the MSDSOnline system can be found in Appendix A.

7.0 EMERGENCY PROCEDURES

7.1 Hazardous Material Spill or Release

- In the event of a chemical or biologic spill, leak, or other emergencies; immediately alert others in the area and your supervisor, and evacuate the area, if necessary.
- If there is a fire or medical attention is needed, call University Police Services at 702-895-3669 (cell phone) or 7-911 (campus phone) for emergency assistance. Do NOT use a cellular phone near the presence of combustible vapors. Be prepared to provide the dispatcher with the following information:
 - Your name and telephone number
 - Nature of the emergency
 - Location of the emergency on campus (building, floor, and room number)
 - Number of people involved: Is victim(s) conscious, breathing, bleeding?
 - Remain on the line until the dispatcher has asked you all the questions and follow their instructions

Report the incident to EH&S at 702-651-7445.

- If a volatile, flammable material is spilled, immediately warn everyone, control sources of ignition, and ventilate the area.
- If a biohazard contamination occurs, isolate the pathogen either within the biosafety hood or immediately vacate and seal off the area if the spill is uncontrolled.
- Wear appropriate personal protective equipment before controlling the source of the contamination.
- Don't become a victim. Refer to the SDS other references for information as needed.
- Wear appropriate PPE before attending to people who may be contaminated.
- For additional information on Chemical Spills and Releases refer to the *Incident Reporting and Investigation Procedure* at:
https://at.csn.edu/sites/default/files/documents/incident_reporting_and_investigation_aug-20.pdf
- Follow decontamination procedures in accordance with the type of material and the extent of exposure. Refer to the CSN Laboratory Safety Manual (section 9.0) for additional information.

7.2 Suspected Overexposure to a Hazardous Substance

- Seek medical attention immediately. Call 7-911 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 exposure incident to the department/program supervisor. All accidents must be reported by the employee's supervisor or department to the CSN Department of Environmental Health & Safety (EH&S) at 702-651-7445, and NSHE Business Center South - UNLV Risk Management and Safety at 702-895-5404. Incidents involving employee hospitalization or fatality must be reported immediately so the appropriate actions can be taken. If University Police Services records an employee injury report, a copy of that report should be forwarded to EHS.
- Supervisors are to notify CSN Human Resources as soon as possible. Fill out and submit a *C-1 Notice of Injury Form*. For additional information on injury reporting refer to the *Incident Reporting and Investigation Procedure* at: https://at.csn.edu/sites/default/files/documents/incident_reporting_and_investigation_aug-20.pdf
- 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.

Accessing CSN Safety Data Sheets Library

CSN Safety Data Sheets (SDS) Library can be accessed on the Environmental Health and Safety webpage:
<https://www.csn.edu/environmental-health-safety>

Alternatively, follow this link to access CSN SDS Library:

<https://chemmanagement.ehs.com/9/38af4f49-b93c-46ce-a46f-3944e8d27fde/msdsonline-search>

I. Definitions

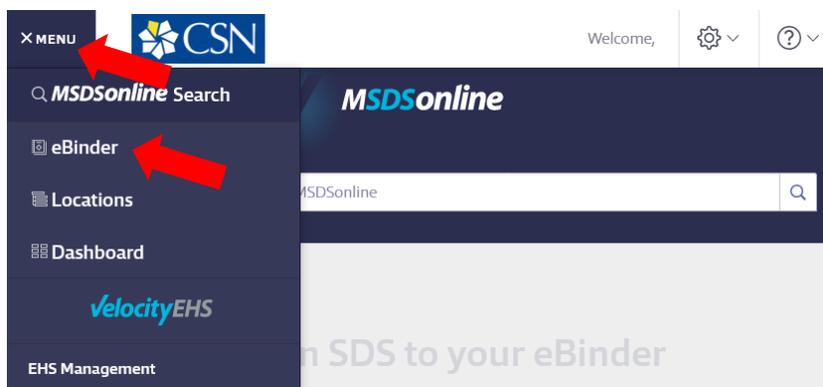
MSDSonline (Search) – cloud-based SDS database hosted by VelocityEHS

eBinder – CSN’s SDS library

II. Accessing eBinder

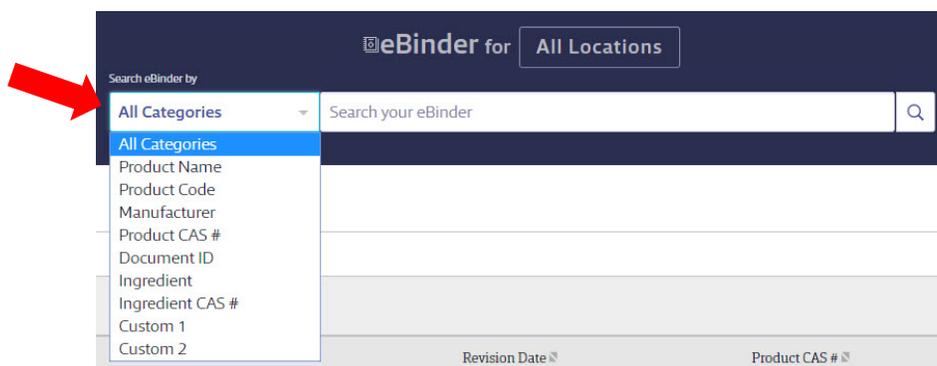
If your account does not default to your eBinder:

1. click on the Menu button in the upper left corner of the screen,
2. then click on the eBinder button.



III. Searching for an SDS within the eBinder

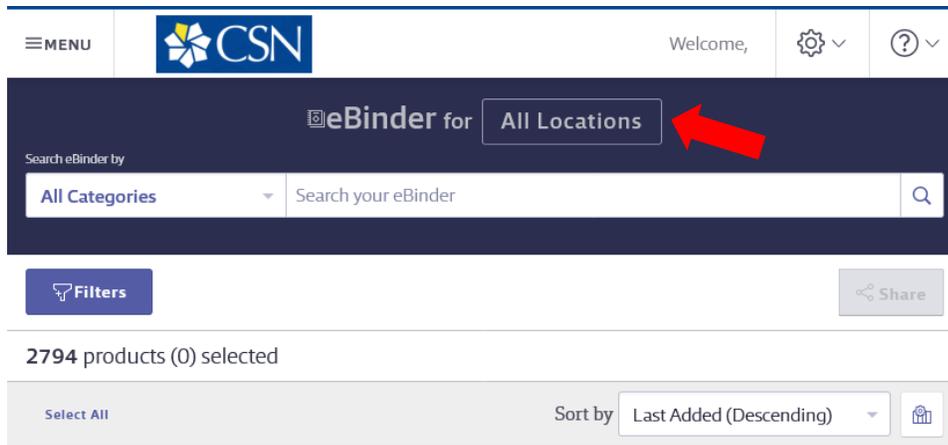
- Type the product information into the single search field and click Search. The single search field allows you to search by product details, including Product Name, Manufacturer, CAS#, and Product Code.
 - After you type at least three characters of your search term into the Search Bar, you will see suggested search results and categories. You can either click on one of these options, click the Search button, or press Enter on your keyboard.
- You can pre-filter your search results by selecting a category from the All Categories drop-down. By default, the eBinder will search by “All Categories”. If you want to search in only one category, click on the Categories menu and select the category in which you want to search. Then type your search term into the Search Bar and click the Search Icon or press Enter on your keyboard.



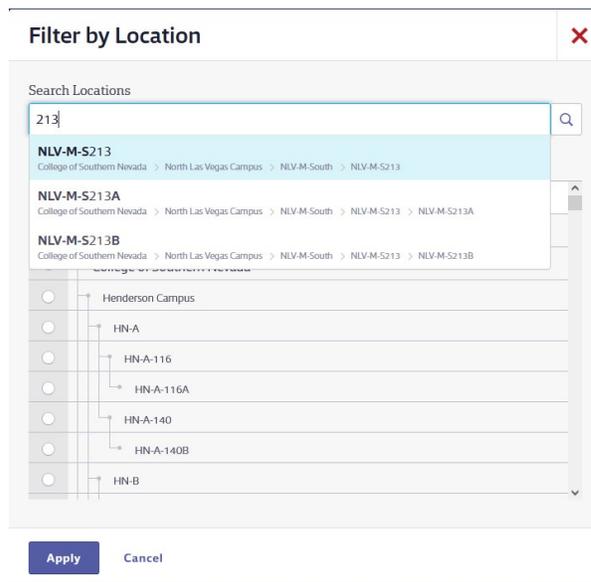
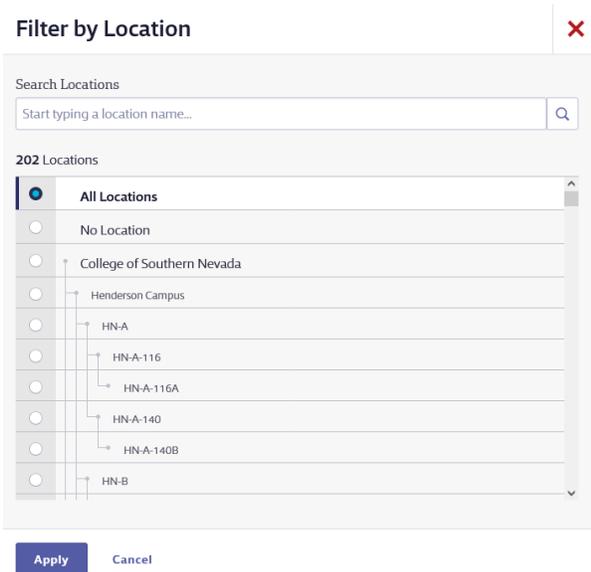
Appendix A (continued) Accessing CSN Safety Data Sheets Library

IV. Searching for an SDS within a location

- Above the Search Bar, you will see an “All Locations” button. By clicking “All Locations”, you will then have the option to select a specific location to search.



- To find a specific location either scroll down the list or type in the room number in the Search Bar. Select the room you want to view then click Apply.



- If searching your eBinder produces no results, you can either “Search MSDSonline” or contact EH&S Department for assistance.

Appendix A (continued) Accessing CSN Safety Data Sheets Library

V. Viewing and Printing Safety Data Sheets

- View the SDS by clicking the Document icon to the left of the Product Name. Once open you will see options in the top right corner to print or download the SDS.
- Clicking on the Product Name will take you to the Product Summary. From here you will see the Product Details and any indexed data.

VI. Adding a New SDS to your eBinder

Every time a department purchases a new chemical, the purchaser must first check to see if the chemical is already listed in their location's eBinder inventory (See Section IV above). If it is not listed, the chemical and its associated SDS must be added to their location's eBinder inventory.

To add a chemical to your location's eBinder inventory, follow this link to access the CSN SDS Library: <https://chemmanagement.ehs.com/9/38af4f49-b93c-46ce-a46f-3944e8d27fde/msdsonline-search>

1. Type in Product Name, Manufacturer Name, CAS #, Product Code, or synonym in the search field for the chemical you wish to add and press the enter key or the small magnifying lens at the right of the search field.



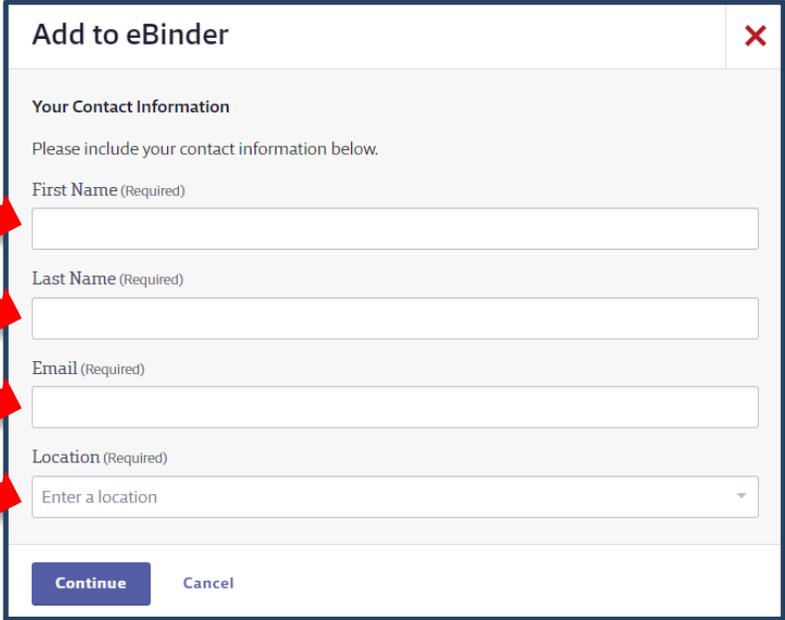
2. Use the checkboxes to select the appropriate chemical(s) in the search results list. Ensure that the chemical selected matches the same Chemical Name, Manufacturer, and Product Code (if available) for the chemical you wish to add.
3. Once the appropriate chemical is selected, click on "Add to eBinder" on the right-hand side of the page.



Appendix A (continued)

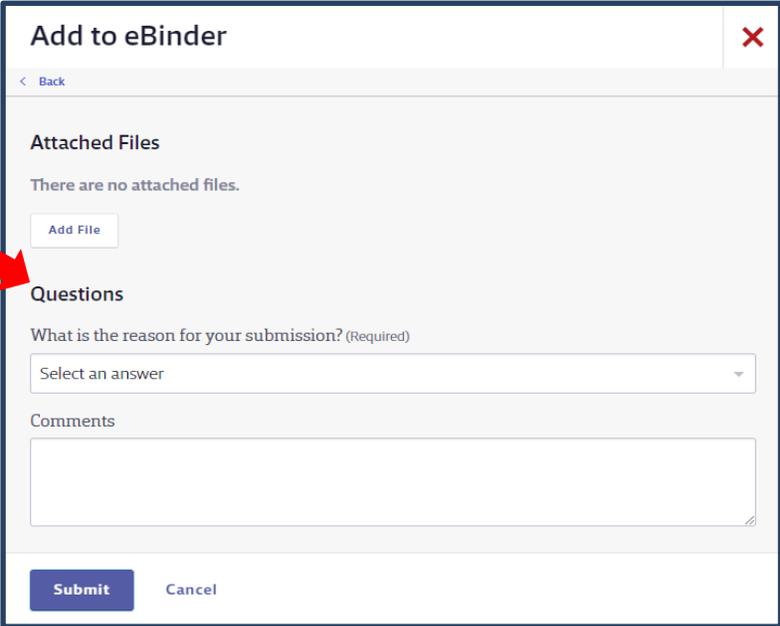
Accessing CSN Safety Data Sheets Library

4. A new “Add to eBinder” window will appear. Complete your contact information and select the location the new chemical is located, then click “Continue” to proceed.



The screenshot shows a window titled "Add to eBinder" with a close button (X) in the top right corner. Below the title is the section "Your Contact Information" with the instruction "Please include your contact information below." There are four input fields: "First Name (Required)", "Last Name (Required)", "Email (Required)", and "Location (Required)". The "Location" field is a dropdown menu with the placeholder text "Enter a location". At the bottom of the window are two buttons: "Continue" and "Cancel". A blue box with the number "4" and four red arrows points to the four input fields.

5. Another window will appear. Complete the questions related to the request and provide any comments as needed for the new chemical (optional). Attach a PDF copy of the current SDS, only if the SDS cannot be found in the CSN SDS Library. A current SDS can be obtained from the manufacturer. Click “Submit” to complete your request. The requester will receive an email confirmation that the SDS requested is being reviewed by EH&S. The requester will receive a follow-up email when the request is approved or disapproved by EH&S.



The screenshot shows a window titled "Add to eBinder" with a close button (X) in the top right corner. Below the title is a "< Back" button. The section "Attached Files" has the text "There are no attached files." and an "Add File" button. Below that is the "Questions" section with the text "What is the reason for your submission? (Required)" and a dropdown menu with the placeholder text "Select an answer". Below the dropdown is the "Comments" section with a text area. At the bottom of the window are two buttons: "Submit" and "Cancel". A blue box with the number "5" and a red arrow points to the "Add File" button.

Hazard Communication Pictograms

OSHA's Hazard Communication Standard (HCS) requires pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards

<p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> • Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)