Comprehensive Workplace Safety & Health Plan

Department of Environmental Health & Safety
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APPENDICES

Each of the following are attached to this comprehensive plan as individual documents.

- Asbestos Management Policy
- Automated External Defibrillator Management Procedures
- Bloodborne Pathogens Exposure Control Plan
- Chemical Hygiene Plan
- Contractors and Outside Agents Safety Policies
- Disease Pandemic Response Plan
- Emergency Event Communication Plan
- Employee Medical and Exposure Records Policy
- Ergonomics
- Fleet Management Procedure
- Hazard Communication Plan
- Hazard Communication Training Agenda
- Hot Work Permit Program
- Respiratory Protection Plan
- Safety Committee Meeting Minutes
INTRODUCTION

Mission Statement – Environmental Health & Safety (EH&S)
CSN EH&S is totally committed to the personal safety, health and well-being of all members of the College community. It is the intention of the College of Southern Nevada (CSN) that all employees, students, and visitors work and learn in an environment devoid, to the fullest extent feasible, of safety and health hazards.

It is our goal to provide timely and relevant information and responsible management, including safety and environmental health training, to enable individuals to perform their work safely.

This mission applies to all sites owned and operated by CSN.

*The College of Southern Nevada recognizes that the health and wellness of our employees and students is our most valuable asset.*

Purpose of the Plan
The purpose of this plan is to outline practices which are fundamental to creating and maintaining a safe and healthy working environment. It is CSN’s road map to environmental health and safety.

SECTION ONE
Responsibility

The President shall:
- Promote a safe and healthy culture throughout CSN.
- Set a high standard for health and safety practices and lead by example.
- Ensure that the needed financial, material and personnel resources are provided to achieve the goals and objectives of the health and safety program.

The Director of Environmental Health & Safety shall:
- Manage CSN compliance with all applicable federal, state, and local health and safety requirements.
- Provide training resources for all employees in appropriate occupational health and safety areas.
- Recommend health and safety policies and procedures.
- Review accident and illness reports and conduct related investigations.
- Promote health and safety and serve as a technical resource to the campus community.
- Review safety and health plans for continuous improvement.

Each Employee without regard to position or station shall:
- Be an active participant in the health and safety program, and attend training.
- Perform all tasks in accordance with established policies, procedures and safe work practices.
- Report any unsafe conditions observed in the workplace.
- Inspect all tools and equipment prior to use to identify any hazards.
- Report any injuries, illnesses or incidents to the appropriate person.
Students shall:
- Be active participants in health and safety.
- Report any injuries, illnesses or incidents to the appropriate person.
- Follow established safety policies set forth in academic curricula.

CSN/NSHE safety, environmental, and wellness committees shall:
- Promote health, safety, and responsible environmental practices.
- Encourage communication between employees and administration.
- Serve in advisory roles on issues relative to safety, health, and the environment.
- Make recommendations to the administration whenever appropriate to maintain and enhance campus safety and environments.

SECTION TWO
Hazard Identification, Analysis & Control

In order to maintain a safe and healthy educational environment, all must be vigilant in efforts to identify, analyze and control any existing or potential hazards on all campuses. The following shall serve as a guideline for our efforts.

Identification and Analysis of Hazards
Before hazards can be corrected, they must first be identified and analyzed. This can be accomplished through the following means (among others).
- Employee observations -
  The Department of EH&S shall encourage members of the college community and the college committees to report potential or existing hazardous conditions to the Director so that they can be corrected swiftly. The department shall maintain a direct method of communication.

- Safety and health inspections by individuals trained in hazard recognition -
  The Department of EH&S shall conduct periodic facility inspections on all campuses.

- Job analysis -
  Job analysis or job descriptions shall be used to ascertain areas for potential injury or illness. Every attempt will be made to alleviate the potential danger proactively.

- Accident/Injury reports and/or investigations -
  Reports following accidents, incidents, and injuries shall be reviewed by the Department of EH&S to determine areas and issues to be addressed to prevent future injury. Training priorities will be assessed using injury and illness reports and logs.

  EH&S shall provide for environmental assessments where deemed appropriate, and monitoring resources will be provided for purposes of maintaining indoor air quality.
Correction of Hazards
Once hazards have been identified and analyzed, they shall be given a priority based on their relative severity. Hazards shall be controlled as follows.
- Any hazard which can be eliminated shall be, to the fullest extent feasible.
- All hazards shall be controlled by use of engineering or administrative controls or a combination of these as appropriate.
- Personal Protective Equipment (PPE) shall be used as appropriate.
- EH&S shall monitor the progress of all remediation projects

Indoor Air Quality
Members of the campus community deserve the highest quality indoor air feasible. The college shall provide resources for appropriate ventilation and monitoring of contaminants as EH&S, consulting engineers and/or other agencies deem appropriate.

Recommendations for control shall be made to the appropriate departments.

Biological Hazards
Potentially infectious materials such as human body fluids or tissue and microbiologic waste shall be collected and disposed of according to state regulations. CSN shall contract with a qualified vendor to remove and properly dispose of all biological waste. Such waste shall NOT be disposed of in regular trash receptacles. This program is administered by the Department of EH&S and overseen by the college Infection Control Manager.

Bloodborne Pathogens
CSN is committed to protect employees from exposure to blood and other potentially infectious materials in the workplace and strives to comply with every aspect of the OSHA Bloodborne Pathogens Standard 1910.1030. CSN’s written Bloodborne Pathogens Exposure Control Plan outlines methods by which employees are identified who, according to their job description have potential for exposure to infectious diseases, use of Standard Precautions, using engineering controls and safe work practices to reduce potential for infection, the hepatitis B vaccination program, post-exposure medical evaluation and follow-up procedures, communication of hazards, and record keeping. The Bloodborne Pathogens Program is administered from the Department of EH&S and overseen by the Infection Control Manager. SEE APPENDICES to view the CSN Bloodborne Pathogens Exposure Control Plan.

Asbestos Management
Proper management of asbestos contaminated materials is mandated by a number of regulatory agencies. CSN shall comply with such regulations and endorses NSHE policy on asbestos management. SEE APPENDICES to view the NSHE Asbestos Management Policy.
SECTION THREE
Health & Safety Education & Training

Providing training for CSN employees is a crucial part of having an effective health and safety program. A well-trained employee will be a much safer healthier employee.

EH&S is responsible for development, implementation and evaluation of health and safety education and training programs. The Director will work in conjunction with employee supervisors and Human Resources to determine specific training needs and requirements for specific job positions.

Some training will be conducted in-house, while that requiring special expertise or special delivery methods will be contracted to an outside source (currently “ClarityNet”/Coastal for online courses). The Center for Academic and Professional Excellence (CAPE) serves to coordinate training delivery and records of employee training attendance. The CSN Department of Workforce and Economic Development shall also assist in providing appropriate training sources.

The following persons shall receive training:
- New employees
- Current employees (full and part time)
- Temporary employees
- Work Study Students
- Volunteers

Circumstances under which training will be needed include:
- At new hire orientation sessions
- Before assignments to hazardous tasks
- When processes, procedures, equipment or materials are significantly changed
- When employee performance or behaviors indicate that additional training is needed

According to the type of work required of the employee, training topics and format will be tailored to specific hazards. Topics may include policies and procedures in specific departments, applicable regulations and statutes, and general safety rules.

The format of the training may be classroom, on-the-job training, or computer based training. Outlines of specific training programs will be approved by the Director of EH&S to assure the programs cover all required topics and that the training is conducted in a professional and consistent manner.

CAPE will continuously assess all courses through evaluations from participants.

Training records shall be maintained for a minimum of three years (required by Nevada law) by the college.
Hazard Communication Plan
The CSN Hazard Communication Plan is to ensure that all persons who handle, use or store chemicals in the workplace are familiar with the physical and health hazards associated with such chemicals. The Plan covers chemical inventories, utilization of proper chemical labeling, availability of Material Safety Data Sheets (MSDSs), and employee training.
SEE APPENDICES to view the CSN Hazard Communication Plan.

Laboratory Safety
A written “chemical hygiene plan” addressing laboratory safety has been produced to cover the following topics: chemical inventory, lab cleanliness, spill clean-up, hazardous waste disposal, and chemical storage and incompatibilities, MSDSs, training, record keeping, standard operating procedures and more.
SEE APPENDICES to view the CSN Chemical Hygiene Plan

SECTION FOUR
Property and Life Safety

Fleet Safety Management
NSHE’s policy Fleet Management Procedures establishes the criteria for determining employee eligibility to operate NSHE vehicles; outlines procedures by which an employee acknowledges and accepts responsibility for the safe operation of NSHE vehicles; and establishes requirements for enforcement of operating procedures and safe driving practices. This program is administered by NSHE Risk Management.

CSN Powered Utility Cart Safety Program – (currently in development)

Fork Lift Safety Training Program – available through CSN Workforce and Economic Development

SEE APPENDICES to view the NSHE Fleet Management Procedure

Ergonomics, Workplace
NSHE’s policy Ergonomics Program focuses on the application of sound ergonomic principles that reduce the incidence of musculoskeletal disorders (MSDs) or injuries for individuals who are required to perform strenuous or repetitive motions.
SEE APPENDICES to view the NSHE Ergonomics Program

First Aid and Medical Treatment
Occasionally an accident or injury requires first aid or medical treatment. The Emergency Procedures poster prominently displayed in numerous areas in every building on every campus outlines steps to take to secure assistance.

Campus security officers are trained in first aid, CPR and administration of cardiac defibrillation. Every employee should know the phone number to call his/her campus security office.
Emergency numbers are
651-7911
OR
9-911

First Aid Kits and Supplies – First aid kits and replacement supplies can be ordered through the Department of EH&S by contacting the Infection Control Manager.

Hazardous Material Spill Response
In the event of a spill of any hazardous material, large or small do the following:

- 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 are 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.

IF ADDITIONAL EMERGENCY ASSISTANCE IS NEEDED, SECURITY WILL MAKE THE CALL.
SEE APPENDICES to view the CSN Hazard Communication Plan and additional information on hazard materials management.

Hazardous Energy Lock Out / Tag Out and Confined Space awareness
Facilities Management maintenance staff maintains equipment/locks/tags; mandatory participation in the lockout/tagout and confined space awareness training course, depending on job title.

Personal Protective Equipment (PPE)
Some injuries and illnesses result from exposure of the body to potentially injurious substances. Exposure may result from inhalation, ingestion, breaks in the skin, direct contact with the eyes, nose, mouth, or absorption through the skin. The use of protective equipment such as gloves; eye protection; gowns, aprons, jumpsuits, uniforms; shoe covers; head covers and others help to reduce or eliminate risks. All PPE deemed necessary will be provided by the college at no cost to the employee. Such equipment will also be laundered, replaced and repaired at no cost to the employee.

Training in the selection, use and maintenance of PPE will be conducted.

Details on PPE use are also covered in various programs specific plans such as Bloodborne Pathogens Exposure Control Plan, Hazard Communication Program, and Respiratory Protection Plan.
Public Access Defibrillation (PAD) Program
CSN has established a PAD Program to reduce the time between a medical emergency and defibrillation and to improve the cardiac arrest survival rate. This program is administered from the Department of EH&S and overseen by the Infection Control Manager. Components of the program include:

- Training designated rescuers in CPR and how to use an AED
- Location of Automated External Defibrillator (AED) units in each major building on every campus
- Integrating with the local Emergency Medical Services (EMS) system
- Using and maintaining AEDs according to the manufacturer’s specifications

SEE APPENDICES to view the NSHE Automated External Defibrillator Management Procedures.

Respirator Program
Required under the OSHA Respiratory Protection Standard, CSN has developed a written respiratory Program which addresses protection from inhalation hazards in the workplace while providing guidance on suitable respiratory use and restrictions.

SEE APPENDICES to view the CSN Respiratory Protection Plan.

Contractors and Outside Agents
NSHE’s policy Contractors and Outside Agents Safety Policies establishes policies such as, but not limited to certification of insurance, training in safe work practices, documentation of such training, handling and disposal of hazardous materials, drug and alcohol use in facilities, notification of any work that may cause the fire alarm system to activate, use of power equipment and vehicles.

Contractor responsibilities with respect to the use of hazardous agents on campus are also covered in the CSN Hazard Communication Plan.

SEE APPENDICES to view the NSHE Contractors and Outside Agents Safety Policies

Hot Work
NSHE’s Hot Work Permit Program establishes responsibilities, discusses hot work permits, fire watches, spark or flame producing equipment, training, tasks to be performed prior beginning hot work, precautions that must be taken during and after hot work and prohibited hot work locations.

Procedures for coordination of hot work activities shall be developed by EH&S.

SEE APPENDICES to view the NSHE Hot Work Permit Program

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SECTION FIVE
Accident/Incident Reporting, Investigation & Corrective Action

When accidents, injuries or incidents occur, it is imperative that they be reported to the appropriate person, investigated to learn how and why it occurred and take corrective action to avoid a repeat in the future. Any work related injury or illness is covered by CSN Workers’ Compensation Insurance.

Following an accident, injury or incident, the EMPLOYEE shall do the following.

- STOP the activity
- IMMEDIATELY REPORT the incident/accident to your SUPERVISOR and/or CAMPUS SECURITY
- GET FIRST AID or EMERGENCY HELP, as appropriate.
  - Call 9-911 if need emergency help
- SEEK MEDICAL ATTENTION. The initial appointment may be with any physician you wish. For the second or additional follow-up appointments, you must choose a physician contracted by your Managed Care Organization. The Workers’ Compensation Coordinator shall offer assistance in this area.
- COMPLETE necessary REPORTS as soon as possible
  - CSN Written Statement available on the EH&S web page and from Campus Security
  - Notice of Injury or Occupational Disease Incident Report (C-1 form). Available on EH&S web page and Human Resources. Return to Workers’ Compensation Coordinator within 7 days.

Copies of all C-1 forms shall be reviewed by the Director of EH&S followed by an appropriate investigation. Corrective action shall be coordinated with the employee’s supervisor. Everything possible will be done to prevent recurrence of the incident. Deficiencies in policies or procedures will be promptly corrected. Recommendations resulting from accident investigations will be acted upon in a timely manner.

The Director of EH&S shall meet periodically with the appropriate vice president and NSHE colleagues to discuss accident and injury trends and to implement recommendations for correction.

SECTION SIX
Enforcement / Compliance

This Plan will only be effective if all employees and supervisors are held accountable for their responsibilities and behavior. In general, front line supervisors shall be responsible for administering disciplinary action for repeated violations of safety policies and procedures; however, if the Director of EH&S observes an employee performing a task or behaving in a manner that could result in immediate injury or illness, he/she shall correct the unsafe behavior and then meet with the employee’s supervisor to plan additional training and/or need for potential remediation.

Each supervisor shall be responsible for administering this plan to his/her subordinates and shall contact the Director of EH&S to arrange remedial training if appropriate.
Discipline for violations of safety rules and policies will be addressed in accordance with Nevada System of Higher Education (NSHE) Prohibition and Penalties – A Guide for Classified Staff and or the NSHE Professional / Staff Handbook.

SECTION SEVEN
Record Keeping

Employee Medical and Exposure Records
NSHE’s policy Employee Medical and Exposure Records establishes procedures for the storage, maintenance and disposition of these records for CSN personnel. The policy outlines the manner in which CSN will comply with employer responsibilities for medical and exposure records. It provides employees and their designated representative access to their records. It ensures employee confidentiality and restricted access by the employer. The policy also applies to all employee exposure and medical records, and analyses of such, whether or not the records are mandated by specific occupational safety and health standards.
Details on record keeping are also covered in various programs specific plans such as Bloodborne Pathogens Exposure Control Plan, Hazard Communication Program, and Respiratory Protection Plan.
SEE APPENDICES to view the NSHE policy Employee Medical and Exposure Records Policy

Training, Certifications, Discipline
Records on employee training, certifications, and discipline shall be maintained in the employee’s for a minimum of 3 years.

SECTION EIGHT
Emergency Action Plans

Emergency Event Communications Plan
The Department of Public Safety and Police Services, EH&S, and Legal Counsel have developed a plan to respond to large scale emergencies.
SEE APPENDICES to view the CSN Emergency Event Communications Plan

Emergency Notification System
The CSN ENS provides members of the campus community immediate information in the event of a major crisis or emergency. This system instantly delivers important emergency alerts, notifications, and updates to any device such as email account, cell phone, pager, etc. The system provides CSN personnel with real-time updates including instructions on where to go, what to do or not to do, who to contact and other important information regarding the situation. Access to this system is available to currently enrolled students as well as all currently employed faculty and staff.
**Disease Pandemic Response Plan**  
The CSN Disease Pandemic Response Plan is a guide for members of the College community to respond before, during and after a pandemic emergency. The Plan is intended to serve as a template for responding to large-scale outbreaks of highly infectious respiratory diseases such as Severe Acute Respiratory Syndrome (SARS), Avian Influenza, or H1N1.  
SEE APPENDICES to view the Disease Pandemic Response Plan

**SECTION NINE**  
New Construction and Renovation

The Department of EH&S supports ‘green’ building practices that reduce negative environmental impacts, while using the features of the site to enhance human comfort and health. Preserving site resources and conserving energy and materials in construction and building operations are important benefits. Planning can greatly reduce construction, utility, and maintenance costs. The Department of EH&S shall participate in the pre-design, site analysis and building design aspects of new construction and renovation projects. The Department of EH&S shall also provide input into life safety aspects of new building and remodeling projects.

**SECTION TEN**  
Safety Committee

**Safety, Health & Environmental Protection Advisory Committee (SHEPAC)**  
SHEPAC is the NSHE safety committee which encompasses all campuses within the state system of higher education. The committee investigates means of improving the safety of the campuses, develops recommendations on safety, health, and environmental topics, and submits them for approval to the Chancellor.  
SEE APPENDICES to view most recently approved meeting minutes.  
[CSN Safety Committee - (in process)]

The goal is to provide a safe and healthful environment that is conducive to teaching, learning, research, and public service. Membership shall reflect the diversity of functions, specialties, expertise and departments across all departments of the College. (Note: restructuring of the committee is currently in progress.)

**SECTION ELEVEN**  
OSHA Inspection

In Nevada the Department of Business and Industry, Division of Industrial Relations (NV OSHA) is responsible for enforcement of state and federal regulations governing safe work environments. Occasionally a NV OSHA Compliance Inspector will make an unannounced site visit to investigate a complaint or otherwise. The Compliance Inspector may enter any facility on any campus requesting information.

If an OSHA inspector arrives:  
- Immediately inform your supervisor  
- Supervisor shall contact Director of EH&S.
• Insist upon seeing the inspector’s credentials that will have a photograph and serial number
• DO NOT get mad, angry or confrontational
• BE pleasant and professional at all times

APPENDICES FOLLOW.