Hazard Communication Program

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## Summary of Changes

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<table>
<thead>
<tr>
<th>Section</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Throughout</td>
<td>Word and punctuation changes</td>
</tr>
</tbody>
</table>
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 health and safety rules.

B. **COMPLIANCE WITH PROGRAM**

This procedure applies to all UNLV employees, designated volunteers, students, and contractors who work with, store, and/or bring chemicals to UNLV.

C. **DUTIES AND RESPONSIBILITIES**

(1) **Contractors**

a. Have an established Hazard Communication Program according to OSHA 29 CFR 1910.1200 Hazardous Communication and comply with the requirements in the program.

b. Provide a copy of their Hazard Communication Program to the UNLV project manager/point of contact.

c. Provide appropriate protective equipment to their employees for the chemicals being used/hazards encountered and ensure it is used when required.

d. Provide the UNLV project manager copies of SDS for all chemicals the contractor will use and/or store on campus.

e. Ensure that all chemicals brought on campus are labeled in accordance with Hazard Communication Program requirements, are secured to prevent leakage and are used for their intended purpose.

f. Ensure if chemical spills occur, they are handled properly and used product containers are disposed of properly.

(2) **Risk Management and Safety (RMS)**

a. Establish the Hazard Communication Program for UNLV.

b. Maintain course completion records of all training completed.
c. Process and distribute routine hazardous chemical deliveries to the campus.

d. Serve as a resource for departments when evaluating non-routine tasks.

e. Perform an annual chemical inventory of all buildings on campus.

f. Post results of the inventory in the Chemical Inventory Management & Electronic Reporting Application (CHIMERA) database.

g. Provide hazardous materials disposal service to departments.

(3) Departments

a. Ensure employees and student workers have completed the Occupational Safety and Health: Hazard Communication Training.

b. Provide information to employees as specified in section H of this procedure.

c. Review the Chemical Hygiene plan prior to conducting work inside of laboratories.

d. Provide PPE provisions to employees.

e. Contact RMS for assistance with hazardous chemical disposal.

f. Provide the following information to contractors/vendors:

   i. Hazardous conditions that contractor/vendor employees may be exposed to at UNLV.

   ii. Information on the precautionary measures needed to protect their employees.

   iii. How to access the SDS for the chemicals used at their work location.

(4) Employees and Student Workers

a. Complete Hazardous Communication training.

b. Wear all personal protective equipment properly.
c. Handle all chemicals properly and in accordance with best practices.

d. Read, understand, and follow the instruction on warning labels and SDS for hazardous materials.

D. 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 on the main page of the RMS website.

(3) A backup is created annually and provided to departments whose employees may not have the capability of accessing SDS on line.

(4) Employees, designated volunteers, and students who bring in chemicals from off campus are required to provide their supervisor/instructor with a copy of the SDS for these chemicals.

E. CONTAINER LABELING

(1) The RMS staff will evaluate chemical labeling on campus when:

a. Processing hazardous chemical deliveries to the campus.

b. Completing the annual chemical inventory.

c. Reports indicate that problems exist with the proper handling, use, or storage of chemicals.

d. Performing routine RMS inspections.

(2) The labeling system used at UNLV will be the original primary container labeling.

(3) Each department will ensure that primary/secondary container labels comply as follows:

a. Contain appropriate chemical identification and hazard warnings.

b. Be firmly affixed to containers during use.
c. Be completely legible to avoid misunderstanding of the information listed.

(4) No chemicals will be used at UNLV until the procedures listed in this section have been followed.

(5) Employees, designated volunteers, and students who bring in chemicals from off campus are required to ensure all containers are properly labeled.

F. ENGINEERING CONTROLS

(1) Elimination and substitution controls will be the preferred method to mitigate hazards. Engineering controls such as adequate ventilation, will be the secondary 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 and employees will ensure that the engineering controls are being used properly.

(3) Each department using engineering controls will:
   a. Check and ensure the equipment is ready for operation prior to use.
   b. Inform employees on how to report 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.

G. 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.
(4) Employees will report any worn, damaged, or defective PPE to supervisor for repair or replacement.

H. **EMPLOYEE INFORMATION AND TRAINING**

(1) RMS will develop and offer Hazardous Communication and Chemical Hygiene training to all employees and student workers, who work with hazardous chemicals, on the requirements of this program.

(2) 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.

I. **HAZARDOUS NON-ROUTINE TASKS**

(1) Departments will assess the processes occurring within their area of responsibility to determine any hazardous non-routine tasks that are performed.

(2) Departments will keep/maintain a list of the non-routine tasks updated.

(3) Once the tasks have been identified, departments will provide appropriate information on the non-routine tasks they will be asked to perform.

(4) Employees are made aware of the chemicals used and how to protect themselves from any hazards encountered.