NORTHERN NEVADA ADULT MENTAL HEALTH SERVICES (NNAMHS)

POLICY AND PROCEDURE

SUBJECT: HAZARD COMMUNICATION, HAZARDOUS MATERIALS, AND MATERIAL SAFETY DATA SHEETS

NUMBER: NN-EC-15

ORIGINAL DATE: 04/08/92

REVIEW/REVISE DATE: 10/28/92, 08/25/95, 11/17/98, 05/01/03, 04/06/06, 11/19/09, 10/18/12

APPROVAL: ___________Cody L. Phinney___________, Agency Director

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I. PURPOSE

To ensure that the hazards of all chemicals are classified and that information concerning the hazards is transmitted to employees.

II. POLICY

NNAMHS will provide information to all employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, safety data sheets, and information and training. NO hazardous materials will be brought on NNAMHS property without going through purchasing.

III. REFERENCES

1. Occupational Safety and Health Administration Hazard Communication Standard 29CFR 1910.1200
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2. NNAMHS Policy NN-EC-14 Definitions: Hazardous Materials and Waste Management
3. National Fire Protection Association (NDPA) Standard 49, Table of Common Hazardous Chemicals

IV. HAZARD COMMUNICATION PROCEDURE

1. At the time of initial employment, each employee will attend an orientation and be given information on MSDS, labeling systems, and types of materials present. Each Department Manager will include the following in their departmental orientation process:
   a. Specific potential hazards present in the workplace.
   b. What personal protective devices are to be used and the necessary training.
   c. What to do in the event of a spill or exposure, including clean-up procedures, who to notify, and when. This should be repeated for any new or subsequent introduction of hazardous materials.
2. Copies of the Hazardous Materials and Waste Management Program and policies will be available in each department, will be included in the employee's orientation, and will be reviewed by each department manager annually.
3. Records of the initial training and any subsequent training must be kept a minimum of thirty (30) years. After the employee leaves NNAMHS, our records will be forwarded by NNAMHS Personnel Office to be maintained by the Department of Personnel in Carson City, Nevada.
4. Records of employee exposure to any hazardous material must be kept for a minimum of thirty (30) years after employment. This includes physical examinations, as well as results of laboratory tests on samples from employees. These records will be forwarded by the NNAMHS Personnel Office to be maintained by the Division of Human Resource Management (DHRM) in Carson City, Nevada.

5. Contractors that perform services at NNAMHS will be informed of potentially hazardous materials in the work environment to which they may be exposed. If warranted, they shall be informed by the NNAMHS Environmental Safety Officer of measures to take to lessen the possibility of exposure, the MSDS on file, and the procedures they are to follow if there is a spill or exposure.
6. Contractors performing service at NNAMHS must provide similar information to the NNAMHS Environmental Safety Officer concerning potentially hazardous materials they bring to the facility.

V. MSDS PROCEDURE

1. Purchasing will include a statement on all purchase orders to the effect that the purchase order will not be considered complete unless a MSDS is on file or accompanies the shipment if applicable.
   a. The individual who checks incoming orders will ascertain that the MSDS has accompanied the order.
   b. If the MSDS is missing and one for that product is not on file at NNAMHS, Purchasing will call the vendor that day and request the MSDS be faxed immediately, plus the vendor will be requested to mail a hard copy.
   d. The order <u>will not be distributed</u> until Purchasing has the MSDS on file.
2. Purchasing is responsible for the completeness and accuracy of the MSDS.
   a. Any that are missing, incomplete, or inaccurate must be corrected by the department <u>prior to the product being distributed</u>.
3. Purchasing will enter the MSDS received into the master file. The master file will be the one used to determine if the MSDS are available at NNAMHS. If a department has an MSDS on file, but it is not in the master file, it will not be considered in existence until a copy is placed in the master file.
4. When Purchasing receives a new MSDS or a revised MSDS, they are responsible to distribute this to all Department Managers within two (2) business

days. It is the responsibility of the Department Managers to educate all of their staff within four (4) business days.

5. Purchasing will keep an index of all MSDS on file. The index will include the title of the MSDS and the effective date. This index will be distributed to all Department Managers on not less than an annual basis.
6. Each Department Manager will have on file all MSDS that apply to their department. This file must be accessible to all department employees.
7. Each employee must receive training on MSDS, where they are, and how they relate to their department within one (1) week of their start of employment.

VI. HAZARDOUS MATERIALS PROCEDURE

1. Department Manager Responsibilities – Each department is responsible for the proper handling and disposal of all hazardous material in their department in accordance with NNAMHS policies.
2. Education – The respective Department Manager is responsible for the department's specific education needs. This is to be an ongoing process, with documentation to support this activity. Education is to be completed within each employee's first week in the department. Each department's education program shall be comprised of the following components:
   a. Location and availability of MSDS sheets and how to use them.
   b. Types of hazards in the department.
   c. An explanation of the labeling system.
   d. Protective measures to ensure safe work practices (i.e., personal safety equipment, emergency/spill procedures, and operating practices).
   e. How new hazardous chemicals will be put into use.
   f. Documentation of safety programs.
   g. How to report a hazardous spill or unsafe work practices.

h. How hazardous wastes shall be disposed of.

3. Waste Minimization

   a. All efforts shall be made to minimize hazardous waste. Hazardous materials, or material which results in hazardous waste upon disposal, will be reviewed at the time of request for purchase by Purchasing.

   b. Substitution may be made of items that are hazardous or have, as the result, hazardous waste byproducts.

4. Purchasing and Receiving – All chemicals must be received by the NNAMHS warehouse Purchasing Department according to the following criteria:

   a. MSDS must accompany materials or already be on file.

   b. Careful inspection of material to assure correct material.

   c. Inspect containers for damage, leakage, etc. If leakage is noted, DO NOT ACCEPT SHIPMENT. If it is necessary to clean up such a spill, inform the transporter, the Purchasing Department Supervisor, and the Environmental Safety Officer immediately.

   d. Attach the appropriate label per NFPA Standard 49 after it is determined that the material will not have to be sent back to the manufacturer.

   e. Purchasing will maintain a master list of all hazardous materials received at the agency and this list will be cross referenced by NFPA category.

5. Labeling

   a. Labeling of hazardous materials is required to inform employees of the nature of the materials they handle and to assure they are handled properly. NNAMHS will comply with the NFPA Standard 49 and other applicable codes. This system uses a diamond shaped label containing four smaller diamonds with colors identifying the hazard category and numbers identifying hazardous properties. The definitions of the colors and the numbers are as follows:

      (i) BLUE – HEALTH HAZARD

4 DEADLY

3 EXTREME DANGER

2 HAZARDOUS

1 SLIGHTLY HAZARDOUS

0 NORMAL MATERIALS

(ii) RED – FLAMMABILITY

4 EXTREMELY DANGEROUS

3 HAZARDOUS

2 WARNING

1 MUST BE PREHEATED TO BURN

0 WILL NOT BURN

(iii) YELLOW – REACTIVITY

4 EXTREMELY DANGEROUS

3 DANGEROUS

2 HAZARDOUS

1 CAUTION

0 NORMALLY STABLE

(iv) WHITE – SPECIFIC HAZARD

OX (OXIDIZER)

ACID

ALKALI

CORROSIVE

WATER REACTIVE

RADIATION HAZARD

b. Manufacturers of hazardous material may use a different labeling system or none at all.

c. NNAMHS requires that a proper label be attached to all hazardous materials. Where no label is provided by the manufacturer or the label is unclear, the NFPA labels should be used. In addition, if it is necessary to decant or reconstitute the hazardous chemical into another container, the information from the manufacturers label shall be affixed to the NFPA label and placed on the container. The information necessary to fill out the diamond label is generally provided in the MSDS.

d. When necessary, NFPA labels will be provided with the shipment of hazardous materials by Purchasing. The transfer of information to the individual containers is the responsibility of the department opening the box.

6. Storage – Any department having hazardous materials must notify the Environmental Safety Officer immediately for proper storage. The following procedures shall be strictly adhered to by these departments:

   a. Hazardous materials must be properly identified.

   b. Store only in area designated for chemical storage. Items in breakable containers must be stored low to the ground and protected as much as possible from being damaged.

   c. Reactive materials must be segregated. (Example: Ammonia should not be stored next to or above Chlorine).

7. Usage and Handling of Hazardous Materials

   a. <u>CAUTION</u> shall be taken to ensure that these materials are being used appropriately.

      (i) Do Not Use them where they are not recommended by the manufacturer.

      (ii) Keep the quantities to a minimum.

      (iii) Do Not Pour out or otherwise use more than necessary.

   b. <u>Instructions</u> for handling on the MSDS must be followed at all times. If you do not know how to handle a particular item or there is no MSDS, you MUST

contact your supervisor before proceeding.

8. Hazardous Material Spills
   a. Isolate the immediate area of the spill.
   b. In the event of a spill, contact your supervisor regardless of the quantity involved.
   c. The supervisor or Department Manager will contact the Environmental Safety Officer or their alternate immediately regardless of the quantity involved.
   d. Upon arrival, the Environmental Safety Officer will assess the situation and take the appropriate action.
   e. Be prepared, if possible, to give information about the material involved, have the appropriate MSDS available for the Environmental Safety Officer and any other emergency response personnel.
   f. Follow MSDS instructions concerning the product.
   g. Fill out the proper Incident Report form and, if a personal injury occurred, complete a C-1 form.
9. Notification
   a. It is the responsibility of every employee to report spills or other problems to their immediate supervisor.
   b. If there is a serious emergency or the spill extends outside the facility or could reach surface waters, call “9-911” and notify the Agency Director or designee along with the Environmental Safety Officer. They will immediately call the National Response Center (9-1-800-424-8802) and give them the information they ask for.
   c. Any person who fails to report a hazardous materials incident also may be subject to a fine, a jail sentence, and the cost of repairing any damage, even if the facility was not the single or main cause of the damage.
   d. IN ANY CASE involving a hazardous material, an Incident Report must be

filled out and sent to Performance Improvement within 24 hours by the Department Manager.

e. In addition, the Environmental Safety Officer must do a follow-up investigation with-in 24 hours and report at the next Environment of Care Committee Meeting.

10. Disposal Procedures

a. If you have materials in your department that meet the definition of Hazardous Waste, you must notify the Environmental Safety Officer immediately for proper disposal. The following procedures shall be strictly adhered to:

(i) A complete inventory of all materials considered hazardous or mixed with hazardous materials to be disposed of is to be provided by the department.

(ii) Hazardous material must be accurately identified, preferably in original containers.

(iii) The container must be free of obvious damage, corrosion, deterioration, and not leaking.

(iv) The Department Manager will notify the Maintenance Department, which will transfer the hazardous waste material to the appropriate storage area.

(v) The container will be clearly marked by the Department Manager in two places with “HAZARDOUS WASTE” and the date.

(vi) If the container is not full, the quantity must be determined and noted on the container.

(vii) Hazardous waste must be stored in containers suitable for the type of waste generated, as determined by the Environmental Safety Officer.

(viii) Hazardous waste MUST NOT be mixed so as to cause a reaction, fire, or leak.

b. DO NOT MIX hazardous waste with non-hazardous materials. This creates a larger amount of hazardous waste, since it will all be classified as hazardous.

c. The Environmental Safety Officer will monitor stored hazardous waste. The storage of hazardous waste must not exceed 180 (one hundred and eighty) days or 270 (two hundred and seventy) days if the disposal facility is over 200 (two hundred) miles away.

d. Additional requirements are that the hazardous waste generator must have an EPA identification number if the quantity exceeds 60kg or 26 pounds.

e. Storage container for hazardous wastes shall be inspected weekly for integrity. If any damage or other problems are found, the material must be placed into another container.

11. Transportation

a. Transportation of hazardous wastes should be arranged through the Environmental Safety Officer only.

b. Individual departments are not to contact haulers or other agencies.

c. All transport of these materials must comply with the Department of Transportation (DOT) and any other applicable regulations.

d. The following will be performed by the Environmental Safety Officer:

(i) Hazardous material shall be properly packaged and identified. Material must be marked "HAZARDOUS WASTE" and dated when the container was first filled. The container content is to be clearly labeled. An MSDS is to be attached in a plastic enclosure.

(ii) Contact the hauler and the designated waste management facility to verify that they have U.S. EPA identification numbers. Additionally, verify they have the necessary permits and insurance.

(iii) Obtain a Uniform Hazardous Waste manifest form and fill in the appropriate section for the material generator.

(iv) Remember, just because the material has been moved from your facility, your liability never ends.

(v) Waste Manifest

1) The waste manifest must be filed and kept on record forever in Purchasing.

2) Within thirty (30) days of shipping, a signed returned copy of the manifest should arrive from the waste management facility.

3) If the manifest is not received in thirty (30) days, the Environmental Safety Officer will follow up and determine the reason.

4) The file must include a copy of the Purchase Order for the transport and management services.

VII. ANNUAL REVIEW PROCEDURE

1. The purpose of the annual environmental review is to ensure compliance with this policy and applicable OSHA, State, and Federal rules and regulations.
2. The review is a function of the Environment of Care Committee and should be conducted by individuals knowledgeable of this policy and applicable OSHA, State, and Federal rules and regulations.