



HAZARD COMMUNICATION PROGRAM POLICY

Review date: April 2012

Persons Affected

This policy applies to all OHSU employees, at all OHSU locations and campuses, who work with or around hazardous materials and/or chemicals on OHSU owned or controlled property.

Introduction

OHSU is committed to providing a safe work environment for all of its employees. In order to improve communication and training associated with the use of hazardous substances, this Hazard Communication Program Policy has been established. This program is designed to help maintain a safe and healthy work environment by increasing awareness of workplace chemicals and potential health effects, safe work practices, and emergency procedures.

Scope and Purpose

The Hazard Communication Program Policy describes how safety hazards related to hazardous materials are communicated to potentially exposed individuals. Additionally, the policy outlines steps to acquire, maintain, and disseminate hazard information.

A hazardous chemical is any element, chemical compound or mixture of elements and/or compounds which poses a physical or health hazard. This definition applies to all hazardous chemicals regardless of quantity. Examples include: combustible liquids, compressed gases, flammables, oxidizers, carcinogens, irritants, reproductive toxins, corrosives, sensitizers.

Chemicals exempted from this requirement are pharmaceuticals 1) in solid, final form for direct administration to the patient and 2) which the manufacturer has not determined to be hazardous. Additionally, consumer products or hazardous substances that are used for the purpose intended by the manufacturer and where exposure is not greater than that of a consumer using the product for its intended purpose are exempt. If you are not sure if a chemical in your work area is exempted, contact your supervisor or EHRS.

Regulatory Standards

The Oregon Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (1910.1200) requires the following:

- Development, implementation, and maintenance of a written hazard communication plan;
- Maintenance of a hazardous materials inventory;

- Maintenance of container labeling and other types of warning;
- Maintenance of Material Safety Data Sheets (MSDSs);
- Employee information and training.

This policy meets the requirements of the Oregon OSHA for having a written Hazard Communication Program.

Implementation and Responsibilities

In order for the Hazard Communication Program to be effective, an understanding of roles and responsibilities is necessary. Implementation of the provisions within this policy is the responsibility of each employee under the direction of individual OHSU departments. Environmental Health & Radiation Safety (EHRS) is responsible for providing technical guidance.

Environmental Health & Radiation Safety (EHRS)

EHRS is responsible for development and management of the Hazard Communication Program at OHSU. Specific responsibilities include:

- Evaluating and updating the Hazard Communication Program Policy every three years or as procedures or conditions change.
- Providing safety expertise and regulatory guidance to personnel regarding purchasing, use, and storage of hazardous substances.
- Recommending Personal Protective Equipment (PPE) and safe handling procedures for specific operational needs.

OHSU Department Managers and Principal Investigators

OHSU Department Managers and Principal Investigators (PIs) are responsible for implementing the Hazard Communication Program at the departmental level. They are also responsible for ensuring safe use of hazardous substances for all areas under their supervision. Responsibilities of OHSU Department Managers and PIs include, but are not limited to:

- Ensuring that individuals working under their supervision know where to find MSDSs.
- Ensuring that chemical inventories are maintained and updated.
- Ensuring hazardous chemical containers are properly labeled.
- Ensuring that OHSU workforce members receive timely and appropriate Hazard Communication training and additional training when new chemicals are introduced to the workplace or when work practices change.
- Ensuring that contractors, visitors, and patients are aware of the program requirements and hazards.
- Evaluating the hazards of chemicals through a review of MSDS information and work practices.
- Providing management commitment and support for successful implementation and maintenance of this Program.

OHSU Workforce Members

OHSU workforce members are responsible for workplace safety and following requirements of the program.

- Participation in Hazard Communication training.
- Reading and understanding the MSDS for each hazardous material that the individual may be exposed to at work.
- Follow measures specified on the MSDS for material handling and use of PPE.
- Follow procedures for acquisition, labeling, storage, and handling of hazardous materials.
- Provide MSDSs to emergency personnel in the event of an exposure to a hazardous material.

Visitors and Patients

Each department or work area has the responsibility of informing all potentially exposed individuals about hazardous materials and chemicals that may be encountered in the normal course of work specific to that area.

This includes OHSU employees from other departments/areas, who are not familiar with the hazards of the specific work area (e.g.: Facilities and Real Estate and housekeeping personnel).

Contractors

OHSU will be notified by contractors when hazardous substances will be used during contracted work. It is the contractor's responsibility to educate potentially exposed OHSU employees about these materials and provide MSDSs in the area of use. Likewise, OHSU employees must inform these individuals of any hazards in the work area.

Requirements

Requirements of the Hazard Communication Program include: a hazardous materials inventory, labeling requirements, maintenance of MSDSs, and training.

Hazardous Material Inventory

Inventories of hazardous materials shall be maintained in each department or work area where the materials are being used. The ideal location for these is as an index to Material Safety Data Sheets.

Inventories shall be updated to reflect currently used/stocked chemicals in the area and periodically reviewed to ensure accuracy.

Material Safety Data Sheets (MSDSs)

A MSDS is an informational document containing physical hazard information, chemical hazard data, and safe handling information for a specific chemical or compound. These are provided by the manufacturer or distributor. MSDSs must be readily accessible to employees during work hours for hazardous materials in their work area.

MSDSs are typically made available in a binder or via a computer or internet database. All are appropriate, but because information must be immediately available in case of emergency (i.e.: power outage or communications delays), **computer databases are not substitutes for backup hard copies or other secondary sources of information not reliant on power sources or internet access.**

Upon receipt of new chemicals or extremely hazardous chemicals, an MSDS shall be entered into the file for the department/work area.

Research laboratories are only required to maintain MSDSs if they are received with the chemical shipment. Though not required, it is recommended that MSDSs be kept for all chemicals used and stored in research laboratories.

Container Labels

A label is any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals. Labels or other forms of hazard warnings, such as tags or placards, provide immediate warning of potential dangers. They may be used to warn of a variety of potential physical or health hazards.

Existing labels on new containers of hazardous chemicals or containers in storage shall not be removed or defaced. All containers must **always** be labeled except for portable containers intended for immediate use by the employee who performs the transfer.

For every container created by an OHSU employee (a Secondary Container that is not supplied by the manufacturer), a container label must be generated. Labels on Secondary Containers must contain the following information, at minimum:

- Product Identity (generic chemical or brand name); and
- Physical/health hazards (including target organ(s), as appropriate).

If you do not understand information on a container label, contact your supervisor or EHRS for assistance.

Before working in areas where hazardous chemicals are transferred through pipes, where there are unlabeled pipes, or where pipes are insulated with asbestos-containing material, employees will contact their supervisor for the following information: 1) chemicals in the pipes or information about the asbestos insulation, 2) physical or health effects of the chemicals or asbestos insulation, and 3) safe work practices to prevent exposure.

Non-Routine Tasks

Employees are periodically required to perform non-routine tasks utilizing a new hazardous material or using a material in an unfamiliar way. Employees must be informed of chemical and physical hazards associated with the performance of these tasks and appropriate protective/safety measures prior to performing work. EHRS is available for consultation.

Training

Each employee working with or potentially exposed to hazardous chemicals must receive initial training on the provisions in this Program. Training will emphasize the following:

- A summary of the OSHA standard and this written program, including the locations of both;
- General properties that can be used to detect the presence or release of hazardous chemicals (e.g.: visual appearance and odor);
- Physical and health hazards associated with potential exposure to specific workplace chemicals;
- Procedures to protect against hazards including the use of PPE, work practices, and emergency procedures;
- Chemical spill procedures;
- Where MSDSs are located, how to understand their content, and how to obtain and use appropriate information.

Initial training must occur prior to working with hazardous substances. It may be performed by individual departments or can be arranged by contacting EHRS (Central Campus: 503 494-7795; West Campus: 503 690-5390).

Additional training must be provided before a new chemical or hazardous material is introduced into the work areas or when otherwise indicated. Training of temporary or contracted employees is a joint responsibility by the contractor's employer and OHSU. The employer must provide general training, and OHSU must inform the employee of specific hazards.

Chemical Spills, Accidents or Emergencies

Anticipate spills by having the proper safety equipment on hand. MSDSs contain special spill clean-up information, if applicable. All waste debris collected during a spill clean-up must be packaged, labeled and disposed of as chemical waste.

Alert personnel in the area when a spill occurs and do what is necessary to protect life first.

Call the Department of Public Safety (DPS) at 503-494-4444 or other emergency number appropriate for your campus (i.e.: 911) for assistance if:

- The spill is too large for you to handle,
- It is a threat to employees or the public (e.g.: volatile fume, explosive, or toxic gas), and/or

- It involves radioactive material; or involves a corrosive, highly toxic, or reactive chemical.

Keep others from entering the area until help arrives. Help is available 24-hours a day by a team equipped to handle most spills that occur at OHSU. If there is the slightest doubt as to how to proceed, do not hesitate to call for assistance or advice **(503-494-4444)**.

Spills involving liquid mercury must be immediately reported to EHRS or DPS. **Do not attempt to clean up these spills without assistance.**

You must notify DPS (Central Campus, 503-494-4444) or EHRS (West Campus, 503-690-5390) of any injury or illness related to exposure to hazardous chemicals. It is advised that your condition be medically evaluated as soon as possible, and the incident be recorded.

Documentation

Central Campus: Record keeping is the responsibility of individual departments. Proof of employee training must be maintained for the duration of the employee's tenure.

West Campus: Record keeping is the responsibility of EHRS. Proof of employee training will be maintained for the duration of the employee's tenure.

Resources

Information about this written program, the OSHA Hazard Communication Standard, or any provision contained within, is available through EHRS.

Reference:

Fire and Life Safety Codes (NFPA and Joint Commission)
[Oregon OSHA](#) (OAR 437-02-0360)
OSHA Hazard Communication Standard (29 CFR 1910.1200)

Related policies, procedures and forms:

Healthcare System: Environment of Care and Chemotherapy Policies
University & Research: Laboratory Safety Manual

Responsible Office:

[Environmental Health & Radiation Safety](#)