



## HAZARD COMMUNICATION PROGRAM POLICY

Effective Date: February 2015	Next Review Date: July 2017
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### **Persons Affected**

This policy applies to all OHSU workforce members, 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 workforce members. 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. This Program is designed to comply with Oregon OSHA Hazard Communication requirements and the Globally Harmonized System (GHS) adopted by OSHA.

The Globally Harmonized System (GHS) is an international approach to hazard communication that provides criteria for the classification of chemical hazards and a standardized approach from manufacturers for label requirements and safety data sheets. Compliance with the GHS requirements will improve the quality and readability of the information received.

### **Scope and Purpose**

The Hazard Communication Program Policy describes how safety hazards related to hazardous materials are communicated to individuals who may be exposed to hazardous chemicals during routine use or in a foreseeable emergency. 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 this intended purpose are exempt. For

clarification on exempt products, contact the area supervisor or Environmental Health & Radiation Safety (EHRS).

### **Regulatory Standards**

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

- Compliance with the United Nations Globally Harmonized System (GHS) of chemical classification and labeling;
- 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 Safety Data Sheets (SDSs);
- Workforce member 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 OHSU workforce member under the direction of individual departments. 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 SDSs.

- 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 SDS 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 SDS for each hazardous material that the individual may be exposed to at work.
- Follow measures specified on the SDS for material handling and use of PPE.
- Follow procedures for acquisition, labeling, storage, and handling of hazardous materials.
- Provide SDSs 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 workforce members from other departments/areas, who are not familiar with the hazards of the specific work area (e.g.: Facilities and Logistics, visiting faculty, or 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 SDSs in the area of use. Likewise, OHSU workforce members 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 SDSs, 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 Safety Data Sheets.

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

### **Safety Data Sheets (SDSs)**

An SDS 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. SDSs must be readily accessible to workforce members during work hours for all hazardous materials in their work area.

SDSs 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, computer and internet options need to include alternate procedures in case of a power outage or communication delay. Departments and laboratories are required to maintain their own SDSs.

Upon receipt of new chemicals or an updated SDS, the SDS shall be entered into the file for the department/work area and new chemicals added to the inventory.

Research laboratories are required to maintain SDSs if they are received with the chemical shipment. It is recommended that SDSs 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 workforce member who performs the transfer. All labels on shipped containers from a chemical manufacturer must comply with the GHS requirements and have the product identifier, a signal word, hazard statement(s), pictogram(s), precautionary statement(s), and the manufacturer information on the label. If the label does not have this information, is defaced, missing or illegible, the container should not be accepted.

There are nine pictograms that apply to the hazard categories per the new GHS requirements which are shown below. These pictograms will be required on manufacturer labels on new chemicals received.

<p><b>Health Hazard</b></p>  <p>Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity</p>	<p><b>Exclamation Mark</b></p>  <p>Irritant (skin and eye) Skin Sensitizer Acute Toxicity Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non-Mandatory)</p>	<p><b>Flame</b></p>  <p>Flammables Pyrophorics Self-Heating Emits Flammable Gas Self-Reactives Organic Peroxides</p>
<p><b>Exploding Bomb</b></p>  <p>Explosives Self-Reactives Organic Peroxides</p>	<p><b>Corrosion</b></p>  <p>Skin Corrosion/Burns Eye Damage Corrosive to Metals</p>	<p><b>Skull and Crossbones</b></p>  <p>Acute Toxicity (fatal or toxic)</p>
<p><b>Gas Cylinder</b></p>  <p>Gases Under Pressure</p>	<p><b>Flame Over Circle</b></p>  <p>Oxidizers</p>	<p><b>Environment</b></p>  <p>(Non-Mandatory) Aquatic Toxicity</p>

GHS Compliant Label Example:

<p>CODE _____ Product Name _____  Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____</p>	<p><b>SAMPLE LABEL</b> Product Identifier  Supplier Identification</p>	<p><b>Hazard Pictograms</b>  <b>Signal Word</b> Danger</p>
<p>Keep container tightly closed. Store in cool, well ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measure against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear Protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified. <b>In Case of Fire:</b> use dry chemical (BC) or Carbon dioxide (CO2) fire extinguisher to extinguish. <b>First Aid</b> If exposed call Poison Center. If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.</p>	<p><b>Precautionary Statements</b></p>	<p><b>Hazard Statements</b> Highly flammable liquid and vapor. May cause liver and kidney damage.</p> <p><b>Supplemental Information</b> Directions for use _____ _____ _____  Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____</p>

For every container created by an OHSU workforce member (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
- Words, pictures, symbols, or a combination of which provide at least general information regarding the hazards of the chemical

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, or where pipes are insulated with asbestos-containing material, workforce members 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**

Workforce members are periodically required to perform non-routine tasks utilizing a new hazardous material or using a material in an unfamiliar way. Workforce members 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 workforce member 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 methods and observations 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 and procedures;
- Procedures to protect against hazards including the use of PPE, work practices, and emergency procedures;
- Chemical spill procedures;
- SDS location 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 workforce members is a joint responsibility by the contractor's employer and OHSU. The employer must provide general training, and OHSU must inform the workforce member of specific hazards.

### **Chemical Spills, Accidents or Emergencies**

Anticipate spills by having the proper safety equipment on hand. The chemical SDSs 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. Only clean up a chemical spill if you feel it is absolutely safe for you to clean it up.

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:

- If you don't feel it is safe or if you don't feel comfortable cleaning up the spill
- If you cannot handle the size of the spill
- If you don't know what the spill is
- It is a threat to workforce members 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 emergency responders arrive. Help is available 24-hours a day by a team equipped to handle most spills that occur at OHSU. 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 recorded.

### **Documentation**

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

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

### **Resources**

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

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**Reference:**

Fire and Life Safety Codes (NFPA and The 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 Manual and Chemotherapy Policies

University & Research: Laboratory Safety Manual

**Responsible Office:**

[Environmental Health & Radiation Safety](#)