HAZARD COMMUNICATION PROGRAM POLICY

Revision Date: March 1, 2001
Supercedes: Written Hazard Communication Program (1991)

1. Applicability

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

2. Scope and Purpose

This policy describes how hazardous material safety hazards are communicated to potentially exposed individuals and outlines steps to acquire, maintain, and disseminate hazard information.

This policy meets the requirements of the Oregon Occupational Health and Safety Administration (OSHA) for having a written Hazard Communication Program.

3. Implementation

Implementation of the provisions within this policy are the responsibility of each employee under the direction of individual OHSU departments. Environmental Health & Radiation Safety (EHRS) is responsible for providing technical guidance.

4. Requirements

a) 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.

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 gasses, flammables, oxidizers, carcinogens, irritants, reproductive toxins, corrosives, sensitizers.
Chemicals exempted from this requirement are pharmaceuticals, and 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. If you are not sure if a chemical in your work area is exempted, contact your supervisor, or OHSU EHRS.

b) Material Safety Data Sheets (MSDS)

A Material Safety Data Sheet (MSDS) is an informational document containing physical and 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 materials that they may be exposed to.

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.

Upon receipt of new chemicals or extremely hazardous chemicals, an MSDS shall be entered into the file for the department/work area. Additionally, OHSU EHRS should be provided a copy of the MSDS. If you do not receive an MSDS with a chemical shipment, you may request one in writing from the manufacturer or distributor. OHSU EHRS may be able to provide you with one from their files.

Research laboratories are only required to maintain MSDSs if they are received with the chemical shipment.

c) 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 OHSU EHRS for assistance.

d) 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 has occurred, and do what is necessary to protect life first.

If the spill is too large for you to handle; is a threat to employees or the public (e.g.: volatile fume, explosive, or toxic gas); involves radioactive material; or involves a corrosive, highly toxic, or reactive chemical, call Public Safety (503-494-4444) or other emergency number appropriate for your campus (i.e.: 911) for assistance. 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 Public Safety. Do not attempt to clean up these spills without assistance.

Accidents Involving Injury or Illness

Central Campus: You must notify Public Safety (503-494-4444) 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 must be recorded.

West Campus: Notify EHRS immediately.

e) 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. OHSU EHRS is available for consultation.
f) 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 Management and housekeeping personnel).

g) 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.

h) 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 personal protective equipment, 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 (Marquam Hill: 503 494-7795; West Campus: 503 748-1501). Online training options and live training schedules are available via the EHRS Web site.

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

5. Documentation

Marquam Hill: 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.

6. Resources

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

Reference:

Fire and Life Safety Codes (NFPA and JCAHO)
Oregon OSHA (OAR 437-02-0360)

Related policies, procedures and forms:

OHSU Hospitals and Clinics Safety Manual
OHSU Hazardous Drugs Policy (Nursing Policies and Procedures: Chemotherapy Manual)

Responsible Office:

Environmental Health & Radiation Safety