

DHHS POLICIES AND PROCEDURES

Section V:	Human Resources
Title:	Safety and Benefits
Chapter:	Hazard Communication Plan
Current Effective Date:	9/21/16
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Purpose

The purpose of this policy is to establish a process for recognizing and communicating hazard information associated with the use of hazardous chemicals throughout DHHS. This program is to serve as a guide for DHHS employees as a method to prevent or minimize exposure from hazardous chemicals.

Policy

It is the policy of DHHS to protect employees, patients, clients, residents, visitors and any other individuals who work with or in close proximity to hazardous chemicals. This policy establishes a hazard communication plan as prescribed in the Occupational Safety and Health Administration's (OSHA's) Hazard Communication Standard - [29 CFR 1910.1200](#).

Definitions

Exposure or Exposed – An employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption).

GHS – Globally Harmonized System, a system of classification and labeling of chemicals.

Hazardous Chemical - Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Hazards Not Otherwise Classified (HNOC) - An adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in this section. The effect either falls below the cut-off value/concentration limit of the hazard class or is under a Global Harmonizing System hazard category that has not been adopted by OSHA.

Hazard Statement – A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

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Pictogram – A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical.

Precautionary Statement - A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

Product Identifier - The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.

Safety Data Sheet - Written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of the OSHA Hazard Communication Standard.

Signal Word - A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in Hazard Communication are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

Roles and Responsibilities

Safety Programs Manager

The Safety Programs Manager (SPM) ensures that a written hazard communication program is in place. The SPM reviews the plan periodically.

Safety Officer

The Safety Officer monitors his/her assigned area to ensure compliance with this policy. The Safety Officer oversees and monitors the effectiveness of the Hazard Communication Program. The Safety Officer coordinates training and maintains documentation in accordance with this Plan.

Manager/Supervisor

The manager/supervisor ensures that employees comply with the guidelines established by this Plan. The manager/supervisor ensures that designated staff complete required training prior to working with or in close proximity to hazardous chemicals.

DHHS Staff

Staff are responsible for complying with this policy. Affected staff complete training as required and follow established safety procedures.

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Labels and Other Forms of Warning

Labeling Requirements

All hazardous chemical container labels must be written in English and contain the following:

- Product identifier – including, but not limited to, the chemical name, code number or batch number.
- Signal word - used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, “Danger” and “Warning.”
- Hazard statements - describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: “Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.”
- Pictogram - graphic symbols used to communicate specific information about the hazards of a chemical.
- Precautionary statement - describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling.
- Name, address, and phone number of chemical manufacturer, importer, or other responsible party.

Hazards not otherwise classified (HNOC) do not have to be categorized on the container.

Chemicals removed from their original containers and put into other containers must immediately be labeled. Containers into which hazardous chemicals are transferred for immediate use by the person performing the transfer do not have to be labeled provided that the chemical is under the direct control of that person at all times.

Labels on hazardous chemical containers are not to be removed or defaced unless the container is immediately marked with the required information indicated above.

If a label is missing, illegible, or defaced, the chemical container must be immediately relabeled.

Supervisors are responsible for updating hazardous chemical container labels within 3 weeks of receiving notification from a manufacturer or distributor of a significant change in a particular chemical’s hazards.

Chemical Inventory

Supervisors must ensure that a chemical inventory is completed annually for each individual hazardous chemical area to accurately reflect the chemicals contained in that room/area.

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Supervisors or their designees are responsible for ensuring that the chemical inventory is updated as chemicals are acquired or removed from the work area that they control. The chemical identity listed on the inventory must be the same as the chemical identity on the corresponding SDS.

The supervisor must review the chemical inventory at least annually and update it whenever a new chemical hazard is introduced into the work area, or if the chemicals in the work area change, whichever comes first. The facility/division Safety Officer may request an updated inventory at any time. The Safety Officer reviews chemical inventories annually.

Safety Data Sheets (SDSs)

A SDS should be received with the first shipment of a hazardous chemical and after the SDS has been updated by the manufacturer. If an SDS is not received with the first shipment of a hazardous chemical, contact the vendor or manufacturer to request one.

If a hazardous chemical is purchased from a retail location, the retailer may not be able to directly provide the SDS. However, the retailer is obligated to inform the purchaser of the method for obtaining the SDS.

A SDS must be kept for each hazardous chemical used or stored in the area.

SDSs are written in English.

SDSs are readily available during each work shift to all DHHS employees who work with hazardous chemicals. It is the responsibility of supervisors to ensure that their employees have access to all necessary SDSs. This may be accomplished through the use of an SDS binder or by providing internet access to an online database system.

If an employee must travel to other work locations, the SDSs are maintained at the primary work location. However, the employee must be able to access the SDS in the event of an emergency.

Supervisors are responsible for reviewing all received SDSs for missing or inadequate content. If an SDS is deemed insufficient, contact the manufacturer or distributor to request a complete SDS.

Training

Hazard Communication training is conducted for employees that are required to work with or in close proximity to hazardous chemicals at the time of initial assignment, whenever a new physical or chemical hazard is introduced into the work area, and annually thereafter.

Hazard Communication training includes the following:

- The requirements of [29 CFR 1910.1200](#) Hazard Communication

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- The availability, location, and details of the DHHS or site-specific Hazard Communication Program, including how to obtain an SDS and the chemical inventory
- Methods and observations used to detect the presence or release of a hazardous chemical
- Physical and health hazards of chemicals
- Controls used to protect employees from physical and health hazards
- Using labeling and signage to identify hazardous chemicals / hazardous chemical work areas
- Chemical inventory requirements and the location of the chemical list
- Exposure minimization
- Exposure and spill response

The Safety Officer will maintain documentation of attendance, which will include the training date, employee's name, job title, and signature.

Non-Routine Tasks

Supervisors are responsible for ensuring that their employees are informed of the hazards of non-routine tasks. Supervisors should contact the Safety Officer for assistance in assessing and determining training needs. Any necessary training must be given before the non-routine task begins.

Unlabeled Pipes

All pipes containing chemicals must be clearly labeled as to the contents. Contact the Safety Officer if a label is missing or illegible.

Contractors/Vendors

Supervisors are responsible for communicating hazards to the contractor. The contractor is responsible for appropriately training his/her employees on Hazard Communication.

The supervisor or designee is responsible for obtaining access to the SDSs for the chemicals that the contractor/vendor will use during the course of their work.

References

- OSHA General Industry Standard, Hazard Communication, [29 CFR 1910.1200](#)

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For questions or clarification on any of the information contained in this policy, please contact [Human Resources](#). For general questions about department-wide policies and procedures, contact the [DHHS Policy Coordinator](#).

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