



Hazardous Communication

Hazardous Communication

Hazardous Communication Program

Scope:

- This action of the program applies to all departments where any chemical is known to be present in such a manner employees may be exposed under normal conditions of use or in a foreseeable emergency.
 - The following OSHA definitions are used to lend clarity to the intent of the program:
 - **Hazardous Chemical**- any chemical which is a physical hazard or a health hazard.
 - **Health Hazard**- includes chemicals which are carcinogens, toxic agents, reproductive toxins, irritants, corrosives, sensitizers, neuro/hepato/ nephro/hematotoxins, and agents which damage the lungs, skin, eyes, or mucous membranes.
 - **Physical Hazard**- includes chemicals which are flammable, explosives, oxidizers, combustible liquids, compressed gas, organic peroxides, pyrophoric, unstable (reactive) or water-reactive.

Elements:

- Hazard Determination- The facility chooses to rely in the evaluation performed by the chemical manufacturer.
- Identification:
 - A master inventory list of chemical hazards will be maintained by the Program Coordinator. Copies will be provided to every manager quarterly.
 - Procurement of chemicals already included in the master list will be requested through Dr. Lynn or the individual department.
 - All requests for the purchase of new hazardous chemicals will be submitted by Dr. Reese. A copy of the MSDS should be submitted with the request. (See attachment 1)

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Purpose:

- The goal of this program is to assure the safe management of hazardous chemicals.

Basis of the Program:

- OSHA Standard 1910 (Hazard Communication Law, Final Rule, Federal Register Volume 52 No. 163, August 1987)

Objectives:

1. Describe the mechanism for procurement and evaluation of all chemicals
2. Describe the standard systems of labeling of chemicals prior to actual use
3. Describe the employee information and training program requirements
4. Describe proper storage and handling of hazardous chemicals from the point of entry to final disposal

Responsibilities:

- The Risk Manager is ultimately responsible for the implementation of the Hazardous Communication Program.
- The Employee Health Officer is designated as the Program Coordinator. His/her specific responsibilities include:
 - Coordination and day-to-day operation of the program
 - Act as chairperson of the Hazard Communication Committee
 - Coordinate audits and monitoring of departmental compliance to the program
 - Maintenance of records relevant to the implementation and evaluation of the program
 - Evaluation of the policies and procedures conjointly with the Hazard Communication Committee

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Responsibilities Continued:

- Maintenance of master inventory list and master collection of MSDS for Hazardous Chemicals used throughout the hospital
- Provide guidance to Managers to ensure appropriate implementation of the

Hazard Communication Committee

- The Hazard Communication Committee is a subcommittee of the Safety Committee.
- Functions:
 - Establishing generic policies & procedures relating to management of hazardous chemicals and waste
 - Assuring compliance to policies & procedures
 - Monitoring on a regular basis & documentation of such
 - Maintenance & update of the master chemical inventory list
 - Screening, control, & evaluation of all requests for the purchase of new chemicals

All Departments:

- Manager shall develop an active program of Hazard Communication for their employees.

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- It is the responsibility of the Manager to identify the potential hazards of material and to seek alternatives to the product.
- The requesting Manager is responsible for assuring that safe procedures are in place prior to the purchase of the chemical. Whenever feasible every attempt will be made to substitute hazardous agents with non-hazardous material.
- **Material Safety Data Sheets (MSDS):**
 - Managers shall obtain from the manufacturer/vendor, a Material Safety Data Sheet for each hazardous chemical in use.
 - Any difficulty in obtaining MSDS from the manufacturer, distributor, or vendor will be documented. Such documentations will be submitted to the Program Coordinator for further action.
 - MSDS files will be updated as new information is received.
 - Expired MSDS sheets will be retained by the Program Coordinator for a period of 5 years.
 - The MSDS Master file will be centrally located in the Emergency Room and the Employee Health Office

Receiving:

- Each Manager shall ensure that each container of hazardous chemicals in
- the workplace is labeled, flagged or marked with the following information:
 - Identity of the hazardous chemical(s)
 - Appropriate hazard warnings
 - Name/address of manufacturer/distributor

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- The manager or his/her designee will visually check for adequacy of labeling of new chemicals delivered to the work site. Every hazardous chemical must be accompanied by the MSDS.
- No employee will remove or deface existing labels on incoming containers of hazardous materials.
- In the event of a chemical is transferred to a second container which will not be for immediate use, then the second container must be labeled. Generic labels will be used and the following information should be included:
 - Identity of the chemical
 - Appropriate hazard warnings
 - Name/address of the manufacturer/distributor
 - Each manager will be responsible in providing protective clothing/equipment to receiving employees to minimize exposure if needed.

Storage:

- Flammables should be kept in flammable-proof storage cabinets
- Bulk corrosives should be stored below counter level but above floor level
- Precautions should be taken to eliminate accidental mixing of hazardous materials
- Large quantities of chemicals should not be purchased for storage

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Segregation:

- Chemical wastes must be contained and separated from non-hazardous wastes.
- The following procedure is established for segregation of chemical wastes.
 - All chemical waste will be transferred in closed containers and should be marked to indicate the type of hazard involved.
 - When two bottles containing an identical hazardous material are combined the empty bottle should be treated as hazardous.
 - The Program Coordinator is available to make determinations of which waste stream is appropriate to use.

Disposal:

- Labeling:
 - Each type of chemical waste will be clearly labeled.
 - If the original label is not clear, damaged, or missing a new label should be attached.
 - Labeling information includes the following:
 - Identity of the chemical
 - Appropriate hazard warnings
 - name/address of the manufacturer/distributor

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Emergency Procedures:

- Spill or Leaks:
 1. Use protective equipment as needed
 2. Fill out a Chemical Incident Report and notify the immediate
 3. Supervisor (see attachment 2)
 4. The Risk Manager will track/investigate all leak/spill incident/s
- Exposure: In the event of an acute exposure, the following procedure will be followed:
 1. Read the label
 2. Consult the MSDS
 3. Notify the Employee Health Nurse ASAP who shall assure that Employee Health Procedures are adhered to in handling of acute and long term exposure
 4. Fill out an Incident Report and notify the Risk Manager
- Disaster: In the event of a disaster, the Emergency Operations Plan will be activated.

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Quiz:

1. The goal of this program is to assure the safe management of hazardous chemicals.
2. All chemicals must be off the floor.
3. Chemicals do not have to be labeled.
4. Right to Know is to protect the employee.
5. Chemicals are not stored with food.
6. This should be an active program.
7. A hazardous is a physical or chemical hazard.
8. The book should be kept in the kitchen.
9. All employees should review yearly or as needed, update with signatures.
10. All employees should know for their own protection.

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Answers:

1. The goal of this program is to assure the safe management of hazardous chemicals. **True**
2. All chemicals must be off the floor. **True**
3. Chemicals do not have to be labeled. **False**
4. Right to Know is to protect the employee. **True**
5. Chemicals are not stored with food. **True**
6. This should be an active program. **True**
7. A hazardous is a physical or chemical hazard. **True**
8. The book should be kept in the kitchen. **True**
9. All employees should review yearly or as needed, update with signature. **True**
10. All employees should know for their own protection. **True**

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Education Record for Dietary Department

Date: _____ Time: _____ Instructor: _____

Title: Hazardous Communication

Persons in Attendance-sign below- all employees***

A synopsis of the in-service includes:

- Scope, elements, & purpose of hazardous communication program
- Responsibility of members of program
- Hazardous Communication Committee
- MSDS
- Storage, segregation, disposal of chemicals
- Emergency Procedures

- | | |
|-----------|-----------|
| 1: _____ | 11. _____ |
| 2: _____ | 12. _____ |
| 3: _____ | 13. _____ |
| 4: _____ | 14. _____ |
| 5: _____ | 15. _____ |
| 6: _____ | 16. _____ |
| 7: _____ | 17. _____ |
| 8: _____ | 18. _____ |
| 9: _____ | 19. _____ |
| 10: _____ | 20. _____ |

Responses and Comments:

CERTIFICATE

1 HOUR ON -HAZARDOUS COMMUNICATION

CERTIFICATE FOR: _____

DATE: _____

TITLE: HAZARDOUS COMMUNICATION

BY: FOOD FITNESS FIRST, INC. TM

SIGNATURE: _____

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