

OTSEGO MEMORIAL HOSPITAL
Gaylord, Michigan

DATE: 06/91

POLICY AND PROCEDURE MANUAL

REVIEWED	REVISED
05/92, 12/97	07/94, 08/99
08/01, 12/08	08/99, 11/02
07/12	11/04, 11/06
	09/09, 03/10
	03/14

DEPARTMENT: Human Resources/T. Deming
Employee Health/L. Stier
DISTRIBUTION: Organization Wide

RE: **Chemical Hazard Communication Program, Code#HR.c.02 RHC**

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KEY WORDS: chemical products, **SDS**

DEFINITIONS

Chemical: means any element, chemical compound or mixture of elements and /or compounds.

Chemical name: means the scientific designation of chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.

Hazardous chemical: means any chemical, which is a physical hazard or a health hazard

PURPOSE

To ensure that hazards of all chemicals produced or imported are evaluated and that information concerning the hazards is communicated to affected employees so that they can participate in and support protective measures in place at Otsego Memorial Hospital (OMH) to protect employees, patients, and visitors.

POLICY

Otsego Memorial Hospital has established a written hazard communication program.

PROCEDURE

The following written chemical hazard communication program has been established:

- I. **Hazard Determination**
 - a. Otsego Memorial Hospital will rely on Material Safety Data Sheets from product suppliers to meet hazard determination requirements.
- II. **Hazardous List and Material Safety Data Sheets (SDS's)**
 - a. A list of all hazardous chemicals used by OMH by department is located online through the Hospital Information folder (under Web Links, **SDS** Online, and Locations).
 - b. Consumer Product Exemption: Products that contain hazardous chemicals in limited concentrations or that have characteristics considered suitable for consumer use and consumption and are not included in the list of hazardous chemicals. **SDS's** are available on line for consumer use products for reference purposes. Examples of such products include toothpaste, mouthwash, deodorant, white out and other products that carry very little potential for harm when used and stored according to manufacturer guidelines. **SDS's** for such consumer use products can also be found

online through the Hospital Information folder (under Web Links, **SDS** Online, Locations, Consumer Product Exemption).

- c. Each Department Director/Designee is responsible for completing a Facilities work order when a product has been added or deleted in their department. Annually each Department Director will review the list by department and provide changes to Facilities.
- d. Facilities Department is responsible for compiling and maintaining the Online **SDS** E-Binder, a back-up CD (which can be found in the Emergency Department in the event that the Internet is down) and a back-up icon and sending the **SDS**/new or revised **SDS** poster to the Department Director(s) that is affected.
- e. Copies of **SDS**'s for employee use are located in the Online **SDS** E-Binder for review by all employees at any time during their shift.
- f. All employees are required to know where to locate the list of chemicals by department online and how to access the **SDS** file online. Employees are also expected to notify the Department Director if they become aware of any inconsistencies with this policy such as unlabeled chemical products or chemical products not included in the list of chemical products by department.
- g. If a required **SDS** is not received, Purchasing and/or Department Director shall contact the supplier, in writing, to request the **SDS**. If the **SDS** is not received after two such requests, Facilities shall contact the MIOSHA's Construction Safety and Health Division at (517) 322-1856 or General Industry Safety and Health Division at (517) 322-1831, for assistance in obtaining the **SDS**. (Either of the above divisions will assist in obtaining a copy of an **SDS**.) The Materials Management Department shall make requests for **SDS**'s on appropriate purchase orders.
- h. It is the responsibility of the Department Director receiving a new or revised **SDS** to forward a copy to Facilities for inclusion in the electronic **SDS** file and to post a notice within the department, which notifies employees of new or revised **SDS**'s within 5 days of receipt of the new or revised **SDS** and display it in a prominent manner for a minimum of 10 days. Facilities will provide the new or revised **SDS** poster to the affected Department Director(s).
- i. Posters identifying the person responsible for maintaining **SDS**'s and where the **SDS**'s are located along with the required MIOSHA Right to Know poster shall be posted in the display case used by Human Resources to post all other required posters and in each off-site building. Posters notifying employees when new or revised **SDS**'s are received will be located in each department affected.

III. Employee Information and Training

- a. HR and Staff Development Coordinator will coordinate and maintain records of employee hazard communication training, including attendance rosters.
- b. Training is to be provided at the time of hire, whenever a new hazard is introduced in the employee's work area and when the employee is transferred to a new job with new hazards. Documentation of this training will be made on the Department Orientation Checklist, which will be forwarded to Human Resources for inclusion in the personnel file.
- c. It is the responsibility of each Department Director to ensure that every new employee to his/her department receives department-specific hazard communication training. This must include information and training on chemical hazards in the specific work area and notification of the location of the **SDS**s, Online **SDS** E-Binder and instruction in the use of the electronic **SDS** file.
- d. The employee shall be informed that:
 - i. The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
 - ii. As an alternative to requesting an **SDS** from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 322-1856, or the MIOSHA General Industry Safety and Health Division at (517) 322-1831, to obtain the desired **SDS**. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.

- iii. Location and availability of the written hazard communication program, the list of hazardous chemicals, **SDS's**, and an explanation of labeling system.
- iv. All operations in their work area where hazardous chemicals are present Review of **SDS's** for chemicals used in the department. This will include instruction in understanding information on an **SDS** and on containers as well as measures employees can take to protect themselves from chemical hazards (such as following proper procedures for handling and the use of protective equipment), and emergency procedures. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
- v. The physical and health hazards of the chemicals in the work area.

IV. Labeling

- a. Each department Director/Designee is responsible for seeing that all hazardous product containers entering into the department are properly labeled.
- b. All labels on original containers from the manufacturer/distributor are to be checked for:
 - i. Identity of the product/material (must be the same name on **SDS**)
 - ii. Appropriate Hazard warning for the material
 - iii. Name and address of manufacturer or distributor
- c. All containers that contain a hazardous chemical which was transferred from the original container must be labeled by the department Director or designee as follows:
 - i. Identity of the product
 - ii. Hazard warning

V. Pipes and Piping Systems

- a. Hazardous contents of exposed pipes and piping systems will be identified by labeling and color coding. The color coding is:

Green	Oxygen
Red	Fire Sprinkler
Yellow	Natural Gas
Brown	Fuel Oil
Gray	Air Lines
Black	Drain Lines
Dark Blue	Domestic Cold Water
Light Blue	Domestic Hot Water
Medium Blue	Boiler Feed Water
Orange	High & Low Pressure Steam
Light Orange	Condensate Supply and Returns
Pink	Heating Supply Lines
Light Pink	Heating Return Lines

VI. Informing Contractors

- a. The department Director/Designee of the area where contractors will be working will coordinate with the EOC Chairperson to ensure that the contractor's employees are given the following information:
 - i. Hazardous chemicals to which they may be exposed while working in a department.
 - ii. Measures the contractor's employees may take to lessen the risks.
 - iii. Location of **SDS's** for all chemical hazards to which they may be exposed.
 - iv. Procedures to follow if they are exposed.
 - v. Measures the Hospital has taken to lessen the risks.
 - vi. The container and pipe labeling system used on-site.

VII. Hazardous Non-routine Tasks if applicable

- a. Occasionally, employees are required to perform non-routine tasks (i.e., enter confined spaces etc). Prior to starting work in such areas, each employee will be given information about the hazards of the area or procedure. This information will include:
 - i. Specific chemical hazards
 - ii. Protection/safety measures the employee can take to lessen risks of performing

the task.

- iii. Measures the company has taken to eliminate or control the hazard, including:
 - 1. Air monitoring,
 - 2. Ventilation requirements,
 - 3. Use of respirators,
 - 4. Use of attendants to observe procedures, and
 - 5. Emergency procedures.

VIII. Trade Secrets

- a. An employer may invoke a trade secret to protect the identity of a chemical.
- b. All other information regarding hazards, methods of protection, and other required SDS data shall be available and trained upon.
- c. For further information on trade secrets, contact Michigan Department of Labor and Economic Growth, General Industry Safety and Health Division at 517-322-1831.

Revised by: Terra Deming

Date: March 2014

Approved: _____
Administrative Representative

Date: _____

Signed copy on file in HR and Administration