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 Headquarters, United States Army Medical Department Activity
 Fort Leonard Wood, Missouri 65473-8952

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Safety
USA MEDDAC HAZARD COMMUNICATION PROGRAM

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**Chapter 1
 Introduction**

1-1. History. This printing is a revision of this publication.

1-2. Purpose. This regulation prescribes the policies, procedures, and responsibilities for the implementation of the Medical Department Activity (MEDDAC) Hazard Communication Program. It represents the written program document required by the Occupational Safety and Health Administration's (OSHA) standard as promulgated under OSHA Standard 29 CFR 1910.1200 --Hazard Communication and the Joint Commission Environment of Care (EOC) Standard 02.02.01

1-3. References.

- a. OSHA Standard 29 CFR 1910.1200, Hazard Communication.
- b. OSHA Standard 29 CFR 1910.1450, Occupational Exposures to Hazardous Chemicals in Laboratories.
- c. DOD Instruction 6050.5, Hazardous Material Information System.
- d. MEDCOM Reg 385-1, Hazard Communication.

*This regulation supersedes USA MEDDAC Reg 385-4, 25 June 2007.

- e. General Leonard Wood Army Community Hospital (GLWACH) Hazard Communication Training Booklet.
- f. Comprehensive Accreditation Manual for Hospitals: The Official Handbook, current edition.

1-4. Terms.

- a. Chemical Hygiene Officer. An individual appointed, in writing, by the laboratory manager to develop and implement the Chemical Hygiene Plan. This individual is qualified by training and experience to provide technical guidance in developing and implementing the Chemical Hygiene Plan.
- b. Chemical Hygiene Plan. A written program IAW OSHA Standard 29 CFR 1910.1450 which sets forth procedures protecting employees from the health hazards presented by hazardous chemicals used in the laboratory.
- c. Collateral Duty Safety Officer (CDSO). An individual appointed by the chief of a department/division/ service/activity to assist in the fire/safety functions as described in MEDDAC Reg 385-10.
- d. Fire/Safety Monitor. An individual designated by the CDSO or officer in charge of wards/clinics/labs/areas to assist the CDSO in carrying out the fire/safety functions to include hazard communication (HAZCOM).

1-5. Applicability. This regulation is applicable to all organizational elements of MEDDAC and the attached supported organizations. Laboratories do not fall under HAZCOM standard per se, but are covered by the OSHA Standard 29 CFR 1910.1450 (Occupational Exposures to Hazardous Chemicals in Laboratories). The requirements are almost identical however, in lieu of having a written HAZCOM Program, each laboratory must have a written Chemical Hygiene Plan. The GLWACH laboratory will follow this regulation.

1-6. Background. The goal of the OSHA HAZCOM standard is to create a safer and healthier worksite for everyone. When working with chemicals, all workers have the right and need to know what they are, the associated hazards, and how to protect themselves. This standard is commonly known as the "Employees Right to Know Law." The MEDDAC Commander has designated the Safety Officer as the HAZCOM Program Administrator to carry out the MEDDAC HAZCOM Program.

1-7. Responsibilities.

- a. Commander: Ensures that employees have the "right to know" about the hazardous chemicals with which they work.
- b. Safety Officer: Overall responsibility to administer the HAZCOM Program. This includes developing a regulation, providing assistance, providing training, maintaining a master inventory of hazardous chemicals, maintaining a master library of MSDS on the G drive, and conducting an annual audit of the program. The inventory and library includes the laboratory and housekeeping even though housekeeping maintains their own program and has MSDS books in every housekeeping closet.
- c. Chief, Preventive Medicine. Provides professional occupational health support to the HAZCOM Program.
- d. Chief, Logistics Division.
 - (1) Ensures that all hazardous chemicals/materials are properly labeled and identified upon receipt, during storage, and when issued/shipped.
 - (2) Provides assistance in obtaining MSDSs, labeling, and other program aspects as appropriate.
 - (3) Provides guidance on operating a satellite accumulation point.
 - (4) Ensure that all HAZCOM requirements are adhered to by contractor personnel performing renovations/ construction/other operations within the facilities that fall under the purview of the Facilities Management Branch.

(5) Ensure housekeeping contractors maintain a fully operational HAZCOM Program that adheres to the MEDDAC program and includes approval of cleaning chemicals prior to use, maintenance of MSDSs, and training of personnel.

e. Commander, Dental Activity (DENTAC). The Commander, DENTAC will follow the guidance within this regulation and specifically ensure the requirements of paragraphs h and i are followed. In addition, the DENTAC Commander will appoint a Chemical Hygiene Officer and ensure that an effective Chemical Hygiene Plan is developed for the dental laboratories.

f. Commander, Veterinary Activity. The Commander, Veterinary Activity will follow the guidance within this regulation and specifically ensure the requirements of paragraph h and i are followed. In addition, the Veterinary Activity Commander will appoint a Chemical Hygiene Officer and ensure that an effective Chemical Hygiene Plan is developed for the veterinary laboratory.

g. Laboratory Manager, Department of Pathology and Area Laboratory Services (DPALS). The Laboratory Manager, DPALS will appoint a Chemical Hygiene Officer and ensure that an effective Chemical Hygiene Plan is developed.

h. Department/Division/Service/Branch/Office Chiefs and Directors. These leaders/managers will ensure:

- (1) Personnel are informed of the HAZCOM Program.
- (2) The HAZCOM Program is implemented within their respective organizational element.
- (3) Initial, annual refresher and worksite specific training is provided.
- (4) Training is documented in HAZCOM books.
- (5) Resources are provided for implementing the program.

j. CDSOs will assist supervisors in carrying out the actions listed below.

- (1) Inform organizational members of the HAZCOM Program.
- (2) Ensure subordinates participate in initial and refresher HAZCOM training via AMEDD Personnel Education and Quality System (APEQS).
- (3) Provide worksite specific HAZCOM training.
- (4) Document both general and worksite specific training in competency assessment folders.
- (5) Obtain MSDSs for all hazardous chemicals used in the work place. All MSDSs must be the most current and/or not more than 5 years old.
- (6) Make MSDSs available for all work shifts and ensure that all personnel know of the location.
- (7) Provide a copy of all MSDSs to the Safety Office.
- (8) Label all hazardous chemicals.
- (9) Check with vendors/contractors to ensure they have MSDSs for hazardous chemicals brought into the worksite.
- (10) Maintain a current inventory of all hazardous chemicals.
- (11) Review and update the inventory as required, but at least annually.

(12) Provide engineering and administrative controls and personal protective equipment (PPE) necessary to protect individuals working with hazardous chemicals.

(13) Enforce the use of personal protective equipment.

(14) Encourage and enforce safe work practices.

(15) Monitor the effectiveness of the HAZCOM Program by walking the organizational area and asking questions concerning HAZCOM.

(16) Establish internal procedures for handling emergencies and hazardous chemical spills/leaks.

k. Employees. All employees will participate in the training, become familiar with the hazards associated with chemicals they use, employ proper safe work practices, use PPE, and warn others to take appropriate action to prevent improper use of and/or exposure to hazardous chemicals.

Chapter 2 Training

a. Training will be provided to ensure that all employees know the chemicals with which they are working, the potential and actual hazards, and how to protect themselves. The GLWACH HAZCOM Training Booklet can be used for the training and supplemented with various training material that is available from the GLWACH Safety Office.

(1) All personnel will be initially trained in HAZCOM via APEQS.

(2) Annual refresher training will be accomplished via APEQS.

(3) Worksite specific training will be conducted by the supervisor and/or CDSO initially, whenever a new chemical is introduced into the workplace, and annually.

(4) Training will be provided prior to conducting non-routine tasks which involve the use of hazardous materials.

(5) Training will include spill cleanup procedures to include at a minimum: PPE requirements, use of spill cleanup kits, and disposal of cleaned up material. OSHA acknowledges that most spills within healthcare facilities can be cleaned up by the using organization; however, personnel must be properly trained under HAZCOM (OSHA Standard 29 CFR 1910.1200). Hazardous Waste Operations and Emergency Response (HAZWOPER) (OSHA Standard 29 CFR 1910-120) training is not required except for the operators of Hazardous Waste Storage Facilities.

(6) All training will be documented in GLWACH competency assessment folders.

Chapter 3 Hazardous Chemical Inventory

a. The hazardous chemical inventory is a list of all hazardous chemicals in the worksite. There are two factors that determine what chemicals to include on the inventory: the chemical's hazardous properties and the likelihood for employee exposure. When the hazardous chemical inventory is prepared, it must consider chemicals in every form - liquids, solids, gases, vapors, fumes, and mists. Also, chemicals in containers and pipes or generated in the work environment must be included. An example of a work place chemical inventory is at Appendix A. The only unlabeled pipes in the MEDDAC are for potable water. Other pipes and valves for oxygen, nitrous oxide, nitrogen, air, and vacuum are labeled. Medical gases are the responsibility of the Medical Maintenance Branch. The inventory must be updated at least annually and when additional chemicals are used.

b. Hazardous Chemicals. To determine if a chemical is hazardous and should be on the inventory, the following should be used as guidance and the chemical should be listed unless a specific exemption is granted.

(1) If the words DANGER, WARNING, CAUTION, or HARMFUL appear on the label.

(2) If the chemical is listed in:

(a) OSHA Standard 29 CFR 1910, subpart Z, Toxic and Hazardous Substances.

(b) The American Conference of Governmental Industrial Hygienists' Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, latest edition.

(c) National Toxicology Program's Annual Report on Carcinogens, latest edition.

(d) International Agency for Research on Cancer's (IARC) of IARC Monographs, latest edition.

c. Chemical Exemptions. The chemical categories listed in Appendix B are exempt from the HAZCOM standard requirements. The exclusions are based on coverage under other Federal laws, no likelihood for employee exposure during normal use, or exposures are not related to the employee's work. However, most of these chemicals still have hazardous properties, and procedures must be followed for their safe use.

d. Labeling. Warning labels should always be read before using any chemical. Warning labels normally depict whether or not a chemical is dangerous, explain safe work practices, and refer to MSDSs.

(1) By law, the manufacturer must attach a warning label to every hazardous chemical shipped to the hospital or clinics. The manufacturer's warning label must list the product's common name or trade name, the hazard warning, and the manufacturer's name and address. Also, the warning labels must be written in English, legible, and prominently displayed on the container.

(2) By law, portable transfer containers do not require warning labels if used by one person only, all of the chemical is used by the end of the work shift, and the transfer container is never left unattended. This is impossible to enforce and mishaps do occur; therefore, it is the policy within GLWACH and supported units to label all transfer containers.

(3) There are alternatives to placing hazardous chemical warning labels on individual chemical containers; for example, posting warning signs or placards on or nearby equipment such as ethylene oxide sterilizers or tissue processors. At a minimum, the signs or placards must list the same information as hazardous chemical warning labels. There may be additional OSHA labeling and/or signage requirements for specific chemicals.

(4) Some chemicals are exempt from the OSHA HAZCOM labeling requirements because other Federal laws define warning labels for these chemicals. However, most of these chemicals still fall under the other provisions of the HAZCOM standard, including the need for MSDSs and employee training (Appendix B).

(5) Incoming containers of hazardous chemicals are checked by logistics to make sure they have proper hazardous chemical warning labels prior to storage and issue. If they don't, the manufacturer is contacted or labels are attached.

(6) The types of acceptable labels include: Department of Defense Hazardous Materials Label, Department of Transportation Hazardous Materials Warning Label, National Fire Protection Association (NFPA) Label (Hazard Classification Guide), and alternative labels. Commercial labels that meet HAZCOM requirements do not have to be changed; however, a command/department/division/service/activity may choose to re-label all containers using the NFPA Diamond or other aforementioned label.

Chapter 4

Material Safety Data Sheets (MSDS)

a. MSDS will be obtained for every hazardous chemical used in the work place. The MSDSs will be kept at a location that is readily available to all employees during working hours. The MSDSs will be kept in a yellow binder that is conspicuously identified. The organization of the binder will be as such that the MSDSs can be easily found. The MSDS binder will only contain those MSDSs that pertain to the chemicals currently being used. NOTE: If it is anticipated that a chemical previously used may be used in the future, the MSDS should be filed for retrieval as necessary. MSDSs will be kept current with no MSDS being more than 5 years old. All employees will be trained on how to read a MSDS. A list of common terms used on MSDSs is in GLWACH HAZCOM Training Booklet.

Chapter 5

Non-Routine Tasks Involving Hazardous Materials

a. Non-routine tasks are:

(1) Those tasks included within a work area's normal activities but performed infrequently (for example, dismantling of a piece of equipment, cleaning a tank).

(2) Temporary duties outside an individual's normal job series.

b. The supervisor will maintain a list of all non-routine tasks which involve hazardous materials and ensure that respective MSDSs are readily available.

c. The supervisor will develop standing operating procedures that thoroughly describe the non-routine tasks, the procedures to follow, the hazardous materials, the required PPE, and other required controls.

d. When an individual is temporarily performing a duty outside of their normal job, the supervisor will provide job specific training to include HAZCOM information.

e. Contractor Operations. When contractor operations take place within MEDDAC facilities and involve the use of hazardous chemicals, the following will be adhered to:

(1) The chemical list and MSDSs will be provided to the Safety Office prior to the use and preferably at the pre-construction conference.

(2) The supervisor in the work area will be provided a list of hazardous chemicals that will be used within their respective work area.

(3) A copy of the MSDSs must be on-site.

(4) If special spill control and/or clean-up procedures are required, the contractor must have the equipment and trained personnel to perform the functions as necessary.

(5) All contractor personnel who work with hazardous chemicals must provide proof of HAZCOM training prior to the beginning of work.

f. Volunteers. When volunteers are involved in operations requiring the use of or are in the presence of hazardous chemicals, they will be provided training and PPE as appropriate.

g. Spills. All individuals using hazardous chemicals will be trained in spill clean-up procedures for the chemicals with which they work. All actions must be undertaken with the use of the proper PPE and training without endangering the individual/user/surrounding employees. The container will be up-righted and/or the leak/spill stopped. The flow should be contained with clean-up progressing IAW the MSDS. The disposal should be IAW the MSDS and

coordinated with the Logistics Division, Material Branch, Warehouse Section (6-3605). If a health hazard is suspected, notify the Safety Officer, 6-9471.

APPENDIX A
Hazardous Chemical Inventory of Ward/Clinic/Activity

HAZARDOUS CHEMICAL INVENTORY of WARD/CLINIC/ACTIVITY

<u>PRODUCT NAME</u>	<u>MANUFACTURER</u>	<u>USER WORK AREAS</u>
Acetone	Mallinckrodt Inc., Science Product Division	All treatment rooms MEDIPREP Station
Calcium Hypochlorite	Chlorox Corporation	Janitor's Closet
Ethyl Alcohol	Monsanto Chemicals Inc	All treatment rooms Clean utility room Storage room
Fixer	Eastman Kodak Corporation	X-ray developing room
Hydrogen Peroxide	Best Chemical Corporation	All treatment rooms Clean utility room Storage room
Oxygen	Best Chemical Corporation	Clean Utility Room
Phenyl Carboxylic Acid	EM Science	All treatment X-ray developing room
Stop Bath	Keuffel & Esser Company	
Titanium Oxide	Sensidyne Company	All treatment rooms Storage room
Xylene	Merck Chemical Company	All treatment rooms Storage room
Zinc Oxide	Best Chemical Corporation	All treatment rooms Storage room

APPENDIX B
Chemical Inventory Exemptions

<u>CHEMICAL</u>	<u>REASON FOR EXEMPTION</u>
Hazardous Waste	Hazardous wastes covered under the U.S. Environmental Protection Agency (EPA) Resource Conservation and Recovery Act are excluded. The EPA defines a hazardous waste as a material exhibiting toxic or hazardous characteristics that is discarded or has served its intended purpose. Note: Usually a MSDS is required when turning in a hazardous waste for disposal.
Tobacco or Tobacco Products	Tobacco or tobacco products are excluded because exposures are not related to work.
Wood or Wood Products	Wood and wood products are excluded because their presence and identification are unmistakable. Also, their flammability and combustibility are well known.
Articles	Articles are excluded because there is little likelihood for a hazardous exposure under normal usage. Articles are manufactured items from chemicals such as vinyl or stainless steel.
Food, Drugs, Cosmetics, or Alcoholic Beverages	Food, drugs, cosmetics, and alcoholic beverages are excluded when they are brought into the worksite for personal and owner consumption.
Consumer Products or Hazardous Substances	Consumer products are excluded when they are used in the same manner as would be used at home. "Same manner" includes duration and frequency. For example, glass cleaner for cleaning the top of a desk. Note: If the job is cleaning desk tops, then the exemption does not exist.
Drugs	Drugs are exempt when they are in the final pill or tablet form. However, drugs are covered under the HAZCOM standard when crushed, dissolved, or manipulated in any way.

The proponent of this publication is the Safety Office. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to Commander, USA MEDDAC, ATTN: MCXP-S, 126 Missouri Avenue, Fort Leonard Wood, Missouri 65473-8952.

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