# HARBOR-UCLA MEDICAL CENTER

## SUBJECT: EMPLOYEE HAZARD COMMUNICATION

POLICY NO. 441

### **PURPOSE:**

To comply with OSHA's Injury and Illness Prevention Program (IIPP) regarding Hazard Communication training (Right to Know).

## **POLICY:**

At Harbor-UCLA Medical Center, employees shall be informed regarding hazardous materials at the time of initial employment, and when new materials or procedures are introduced. Safety Data Sheets (SDS) (formerly Material Safety Data Sheets) shall be accessible to employees in their work area. All hazardous material containers shall be properly labeled.

## **PROCEDURE:**

### I. RESPONSIBILITY

### A. Department Chair/Service Director

The Department Chair/Service Director has final responsibility for compliance with hazard communication requirements and regulations within his/her department.

### **B.** Supervisors

It is the responsibility of all supervisors to ensure that supervised personnel are informed about chemical hazards and of the precautions necessary in the performance of the employee's tasks. Supervisors must maintain records of safety training/education to ensure that Safety Data Sheets (SDS) are accessible, and that all hazardous materials and waste containers are properly labeled. Supervisors must also review, as needed, the hazardous material inventory unit list, as well as update the current SDS and submit the final list to the Safety Office.

### C. Hazardous Materials Safety Officer

It is the responsibility of the Hazardous Materials Safety Officer for the overall program development, serve as the central repository for hard copy SDS forms, provide general hazard communication training, assist users of chemicals with the local program implementation, and to provide assistance in the event of emergencies.

### **D.** Employees

All employees are responsible for being familiar with the chemicals they use, using them in a safe and

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**APPROVED BY:** 

Kim McKenzie, RN, MSN, CPHQ Chief Executive Officer Anish Mahajan, MD Chief Medical Officer

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responsible manner, and seeking supervisory support before the use of new materials or materials in unusual situations. Staff must also know the location of the SDS binder for their unit.

#### II. THE WRITTEN HAZARD COMMUNICATION PROGRAM (CCR Title 8 section 5194(e)) A. Program

The Hazardous Materials Safety Office shall establish a Written Hazardous Materials Communications Program that describes methods to inform employees about the risks of hazardous materials, SDS forms, labeling and training. This will be consistent with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

## B. SDS (Safety Data Sheets) and Inventory

Each Department using hazardous chemicals, should have an SDS for each of these materials. An inventory of the hazardous materials is used to establish a list of the SDS forms that must be maintained. After the initial inventory the SDS manual itself can be used as an inventory list. In the SDS manual it is recommended that there be a guide for interpreting the information in the data sheets. This guide can be obtained from the Hazardous Materials Safety Office. The SDSs shall be available to all employees in their work area. They should be accessible (i.e., not locked in an office or a cabinet) and all employees should know their location. Self-inspection is the original method for developing an inventory; later inspections provide a method to update this inventory with current versions of the SDSs. SDSs for new purchases may be obtained by indicating on the purchase requisition (Global Healthcare Exchange (GHX) that an SDS is needed. Supply Chain Operations (SCO) will request the SDS from the vendor at the time of purchase. Inventories should be regularly compared with the SDS list to ensure that information is available for each item used. Incomplete or unsatisfactory SDS forms should be brought to the attention of the Hazardous Materials Safety Office, who will contact CAL/OSHA and/or the chemical manufacturer.

## III. LABELING (CCR Title 8, section 5194(f))

- 1. All containers holding hazardous materials should retain the manufacturer's or distributor's label with the following information:
  - Identity of the hazardous substance (i.e., trade, product, and chemical name)
  - Appropriate hazard warnings (i.e., health and physical hazards), and
  - Name and address of the manufacturer, importer, or other responsible party.
- 2. If the material is transferred to another container (e. g. Pathology, Facilities Management and Environmental Services) it needs to be labeled with the identity and the hazard warning.
- 3. Stationary containers with signage in place need no labeling (e.g., Power Plant). Materials transferred to an unlabeled container and intended only for the immediate use of the employee who performs the transfer during the same shift need no labeling. SCO handling of sealed packages of hazardous materials is exempt from this labeling requirement (CCR, Title 8, Section 5194 b, 5).

# **IV. EMPLOYEE INFORMATION AND TRAINING**

- 1. New employees will receive Hazard Communication information/training as part of orientation through Human Resources. This information/training shall be developed and provided by the Hazardous Materials Safety Office.
- 2. Department Chairs and Service Directors are responsible for providing workplace specific training. The Hazardous Materials Safety Office will assist, if requested.
- 3. Employee training will include the following:

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- A summary of the Hazard Communication Program
- Hazardous substances in their work area
- The location and availability of the written hazard communication program (this policy), and the Safety Data Sheets.
- Hazardous chemical properties and methods that can be used to detect the presence or release of hazardous chemicals including visual appearance and odor.
- Procedures to protect against hazards (e.g., personal protective equipment, work practices, and emergency procedures).
- Chemical recognition, labeling, storage, disposal of hazardous materials, how to use the SDS, and hazardous materials handling.
- 4. In addition, training will be provided by the department/service if a new procedure or hazardous material is introduced in the workplace.
- 5. A training manual is available through the department and the Hazardous Materials Safety Office.

# **V. RECORDS**

Documentation of training will be maintained by Human Resources (general orientation) and by the employee's department/service (area specific training).

# VI. CONTRACTORS

Departments/services are responsible for requiring all contractors and subcontractors to provide evidence of training related to hazardous materials, when appropriate. The Hazardous Materials Safety Office (x2835) may be contacted for assistance in this matter.

## VII. HAZARDOUS NON-ROUTINE TASKS

Periodically, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees are to contact their supervisors for the following information:

- The specific hazards that are anticipated; and
- Appropriate protective measures to be used (this may include ventilation, personal protective equipment, buddy systems, or other procedures.)

The Hazardous Materials Safety Office (x2835) is available to assist supervisors in determining the appropriate precautions for non-routine tasks.

## VIII. EMERGENCY PROCEDURES

- 1. The range and quantity of hazardous substances requires pre-planning to respond safely to chemical spills.
- 2. The clean up of a chemical spill should only be done by knowledgeable and experienced personnel who are familiar with the chemical hazards and the safety precautions needed.
- 3. Clean up of a small spill can be performed by specially trained area staff (e.g., chemo unit staff). Large spills may require contacting the Hazardous Materials Safety Office (x2835) for assistance.
- 4. All wastes generated from a spill must be properly labeled and disposed of as hazardous waste by the Hazardous Materials Safety Office.

IX. REFERENCE: Title 8, CCR, Section 5194 "Hazard Communication."