15-OSHA Hazard Communication Manual

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ANNUAL REVIEW:

REVIEWED	Sanford N. Bauch, M.D	July-16-2025
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SUPERSEDES: Procedure titled _____

Purpose

The objective of the Hazard Communication Program is to comply with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard, 29 CFR 1910.1200, to ensure that information about the dangers of all hazardous chemicals used by the laboratory are known by all affected employees and to ensure safe handling procedures and measures are used to protect employees from these chemicals.

Scope

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency. Every department and employee will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the laboratory Compliance records area and on MMC web site:

https://home.mmc.edu/ehs/hazardcommunication/

Abbreviation

MMC – Meharry Medical College
OSHA- Occupational Safety and Health Administration's
PPE-personal protective equipment
SDS- safety data sheets

Health and Safety

Always be sure to wear all appropriate PPE when handling chemicals or specimens.

Policy

OSHA requires that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to employers and employees. This transmission of information is to be accomplished by means of a comprehensive hazard communication program, which is to include container labeling and other forms of warning, material safety data sheets and employee training.

Procedure

1. ASSIGNMENT OF RESPONSIBILITIES

a. Program Administrator

The General Supervisor manages the Hazard Communication Program for the laboratory and maintains all records pertaining to the plan, including reviewing, and updating this plan as necessary and facilitating training.

b. Management

The laboratory will ensure that each employee understands and follows the Hazard Communication Program through employee orientation, training, job performance reviews and disciplinary action.

c. Supervisors

Supervisors should themselves follow and ensure that their employees are trained in and use proper work practices, chemical labels, SDSs, personal protective equipment, and proper cleanup and procedures regarding leaks and spills.

Program administrator, managers and supervisor can be one do all

d. Employees

Employees are responsible for employing proper work practices, using personal protective equipment, understanding chemical labels & safety data sheets (SDSs) and cleanup/disposal procedures as described in this plan. Employees are also responsible for reporting all exposure, leak and spill incidents to the Supervisor immediately or as soon as possible.

e. Contractors

Contract employees will be responsible for complying with this plan and will be responsible for providing the training described herein.

2. CONTAINER LABELING

a. The Quality Director/Supervisor or Designee will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name, address, storage and expiration information.

b. The Quality Director/Supervisor or Designee will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning. For help with labeling, see the General Supervisor.

c. The General Supervisor will review the company labeling procedures annually.

3. LIST OF HAZARDOUS CHEMICALS

a. The hazardous chemical inventory list is maintained by the laboratory general supervisor.

b. Hazard information on each chemical may be obtained from the SDSs, located within the laboratory.

c. When new chemicals are received, this list is updated in the log (including date the chemicals were introduced) within 30 days.

4. SAFETY DATA SHEETS (SDSs)

a. The General Supervisor is responsible for establishing and monitoring the company SDS program. He/she will ensure that procedures are followed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. The General Supervisor will see that any new information is communicated to affected employees and will keep a master file of all SDSs with this plan on the data server. The procedure below will be followed when an SDS is not received at the time of initial shipment.

i. Receiving department should notify the laboratory immediately upon arrival of shipment that SDS was not received. Purchasing Department will notify the General Supervisor of the need for SDS.

ii. The General Supervisor will contact the chemical manufacturer, distributor or shipper and request the SDS be emailed or faxed immediately.

iii. If unable to obtain SDS via the manufacturer, distributor or shipper, the General Supervisor should search online for a current SDS on the chemical(s) in question.

b. Copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the following locations:

Hard copy within laboratory or electronically

c. SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact the Quality Team.

d. When revised SDSs are received, the following procedures will be followed to replace old SDSs:

i. The General Supervisor should review the new SDS master and compare it to the SDS master being replaced. If changes are significant enough to warrant new training, the General Supervisor should provide training as outlined in this manual.

ii. The General Supervisor should make necessary copies for all SDS locations.

iii. The General Supervisor should replace old SDS sheets with new SDS sheets at all SDS locations. Old SDS sheets should be destroyed.

5. EMPLOYEE TRAINING AND INFORMATION

a. The General Supervisor is responsible for Implementation of the Hazard Communication Program and will ensure that all program elements and training are carried out. Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will complete assigned training on the hazard communication standard and this plan. All training will be interactive and will include the following:

i. An overview of the OSHA hazard communication standard. The hazardous chemicals present at his/her work area

ii. The physical and health risks of the hazardous chemicals

iii. Symptoms of overexposure

iv. How to determine the presence or release of hazardous chemicals in the work area

v. How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment

vi. Steps Laboratory Name has taken to reduce or prevent exposure to hazardous chemicals

vii. Procedures to follow if employees are overexposed to hazardous chemicals

viii. How to read labels and SDSs to obtain hazard information

ix. Location of the SDS file and written Hazard Communication program

b. Prior to introducing a new chemical hazard into any section of the laboratory each employee in that section will be given information and training as outlined above for the new chemical hazard.

c. Annual retraining of the hazard communication program is required for all employees.

6. HAZARDOUS NON-ROUTINE TASKS

a. In the future, employees may be required to perform non-routine tasks that are hazardous. Prior to starting work on such projects, each affected employee will be given information by the General Supervisor about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps the laboratory is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

7. OTHER EMPLOYERS/CONTRACTORS

a. Any time an outside contractor brings a hazardous substance into the laboratory, an SDS and any additional information for the substance must be received by the Safety Officer or General Supervisor. Similarly, a SDS and any additional information for all hazardous substances in the area that the contractor will be working must be provided to the contractor. This exchange will be coordinated by The Safety Officer or General Supervisor.

b. Service contractors whose work or materials pose a health hazard to the laboratory employees will be responsible for the training and education requirements outlined under the training section of this program. Safety Officer and/or General Supervisor must attend training sessions and ensure the laboratory employees are properly trained.

c. In addition to providing copies of SDSs to other contractors, other contractors will be informed of necessary precautionary measures to protect their employees exposed to operations performed by the laboratory. Outside contractors will be responsible for training their employees.

d. Also, contractor's employees will be informed of the hazard labels used by the laboratory. If symbolic or numerical labeling systems are used, contractor's employees will be provided with information to understand the labels used for hazardous chemicals for which their employees may have exposure.

e. Outside contractors must comply with all provisions of the hazard communication standard while working for the laboratory.

f. All training must be documented and kept on file with the Hazard Communication Program File.

8. CHEMICALS IN UNLABELED PIPES

a. Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee should contact the General Supervisor for information regarding:

i. The chemical in the pipes

ii. Potential hazards

iii. Required safety precautions

9. PROGRAM AVAILABILITY

a. A copy of this program will be made available, upon request, to employees and their representatives.

References

OSHA. (2012). Hazard Communication Standard: Safety Data Sheets. U.S. Department of Labor. Retrieved from https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200

https://home.mmc.edu/ehs/hazardcommunication/