OREGON DEPARTMENT OF FISH AND WILDLIFE POLICY
Human Resources Division

Title: Hazard Communication Program | HR_480_13
Supersedes: HR_480_13, dated September 1, 2004
Applicability: All employees, volunteers and contract service providers
Effective Date: November 1, 2011  Approved:

I. PURPOSE

To promote safety and health of employees, volunteers, and contractors through proper use, handling and storage of chemicals and other hazardous materials.

II. DEFINITIONS

A. Hazardous Substance: Any substance that is recognized as a physical or health hazard by various recognized authorities and agencies. Because the scope of the HazCom standard is so broad, all chemicals brought into the workplace should initially be considered “hazardous substances.”

B. Material Safety Data Sheet (MSDS): A written document describing a hazardous substance in detail and prepared in accordance with OR-OSHA requirements and guidelines. A sample MSDS is included as Attachment A of this policy.

III. POLICY

Hazardous materials shall be used, handled and stored according to the provisions of the ODFW Hazard Communication Program. Failure of employees to adhere to the provisions of this program may result in disciplinary action, up to and including dismissal.

A. Basic Program Requirements

1. Chemicals Used on Site

   a. An up-to-date inventory or list of chemicals used at each ODFW site will be maintained on that site. For larger sites with different distinct areas, an inventory of chemicals used in each area may be maintained for that area.

   b. When employees at a site purchase chemical products, they should attempt to buy products that are on their chemical inventory list. If new products are brought onto the site, they must be added to that site's chemical inventory list.
2. Hazard Evaluation

a. Periodic evaluations of the measures used to control hazardous substances shall be performed at all ODFW locations. The following points shall be covered in these evaluations:

- Types of hazards (e.g., flammable, corrosive, toxic);
- Compatibility of storage and use with other chemicals in the area;
- Secondary containment;
- Container labeling;
- Emergency eyewash/shower facilities;
- Personal protective equipment use (e.g., gloves, faceshields, protective clothing, respirators);
- Spill clean-up supplies;
- Fire protection;
- Ventilation;
- Control of static electricity.

b. The evaluation of the above measures can be accomplished as part of the quarterly inspections performed at the worksites.

3. Material Safety Data Sheets (MSDS)

a. An MSDS must be available at the workplace for each substance on the chemical inventory list. In addition, for remote work areas a copy of the MSDS must be available in the area where the substance is used (e.g., remote acclimation ponds, screen construction, etc).

b. An MSDS may be obtained from the manufacturer or supplier of a chemical substance. If substances are purchased in large quantities (50 cases of chlorine, for example) from retail establishments, employees should request a copy of an MSDS for the substance from the retailer. If the retailer does not have an MSDS, then the site must obtain one from the manufacturer. Many manufacturers have a toll-free telephone number printed on the label to call for obtaining an MSDS. MSDS are also available on manufacturer websites and the ODFW Safety Intranet.

c. Any consumer product or hazardous substance where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure not more than the range of exposures
that could reasonably be experienced by consumers do not need a MSDS on file.

4. Labeling

Manufacturers, importers, and distributors of a hazardous substance are responsible for attaching proper labels and hazard warnings to their products. The responsibility of ODFW with respect to labeling is as follows:

a. Ensure that all containers of hazardous substances brought into the workplace are properly labeled with the identity of the substance(s); name and address of the chemical manufacturer, importer, or distributor, and the appropriate hazard warnings. Appropriate hazard warnings include target organs, nature of hazard (e.g., corrosive or flammable), and first aid measures.

b. Ensure that all portable containers of hazardous substances are labeled with at least the identity of the substance(s) and the appropriate hazard warnings. Copies of the manufacturers’ labels can be affixed to portable containers to meet this requirement.

c. Ensure that labels on incoming containers of hazardous substances are not removed or defaced. If they are, they must be re-labeled immediately.

B. Non-Routine Tasks

1. Non-routine tasks generally require entering tanks and confined spaces, using drugs to immobilize animals, and other types of operations not performed on a regular basis.

2. When the need to perform a non-routine task occurs, employees will be trained in all aspects of the task. This training will be in the form of a pre-task briefing involving the employees and their supervisor. This briefing will include information on the hazardous chemical that will be used, protective equipment and measures that must be taken, and emergency procedures to follow in the event of an incident. Other personnel, as appropriate, will also be included in this briefing. MSDS will be available at sites for any hazardous materials/drugs used at a remote site.

C. Pipe Labeling

1. OR-OSHA rules require all pipes containing hazardous substances to be labeled. All pipes containing hazardous substances (e.g., natural gas, formalin) shall be labeled in a manner that clearly illustrates what substance is in the pipe. Labeling shall be applied where confusion may occur, such as close to valves or flanges, adjacent to changes in direction, branches, and where pipes pass through walls, floors or ceilings. As a minimum, labels shall be applied so an outside contractor or visitor can look at the pipes and identify the hazard present in the pipes.

2. If there are unlabeled pipes at a site, or if there is a question as to the contents of a labeled pipe, a check shall be performed to ascertain the contents of the pipe. Site management shall be responsible for seeing that this step is undertaken. Appropriate
personnel shall be used to determine unlabeled pipe contents. These people may include ODFW personnel, property management personnel, and outside consultants.

3. OR-OSHA rules also require pipes that have asbestos insulation to be labeled. The label for pipe insulation containing asbestos shall include the following:

   **DANGER**
   **CONTAINS ASBESTOS FIBER**
   **AVOID CREATING DUST**
   **CANCER AND LUNG DISEASE HAZARD**

4. For asbestos insulation, the labeling shall be at least, on unobstructed continuous pipe runs, every 75 feet.

D. Contractors, Volunteers, and Non-ODFW Personnel

1. Employees of contractors, visiting employers (e.g., utility workers), and volunteers at the site are entitled to information on any hazardous substance that they may encounter during their time at the site. ODFW will supply information on hazardous substances used at the site including chemical names, MSDS, the labeling system used and recommended personal protective equipment (PPE). Note that ODFW will not supply PPE to outside contractors. Visitors will only be provided with safety glasses and hearing protection if they enter areas where they are required to be worn. The ODFW employee responsible for bringing the contractor or visitor to the site, in consultation with the site safety officer or site supervisors, will be responsible for providing HazCom information to outside contractors and visitors.

2. Controls will also be provided to eliminate the unnecessary exposure to ODFW employees from hazardous substances used by the contractor, visiting employer, or volunteer. When such exposures cannot be effectively eliminated, contract work will be performed outside of regular business hours.

E. Training

1. Employees shall be provided with information and training on the hazardous substances used in their workplace at the time of initial assignment and whenever new hazards are introduced. Upon initial assignment, the training shall include:

   a. Requirements of the HazCom standard;

   b. Location of hazardous substances in their work areas;

   c. Location and availability of this HazCom program, the chemical inventory for the work area, and MSDS for the area;

   d. How to detect the release or presence of a hazardous substance;

   e. Physical and health hazards associated with the hazardous materials used;

   f. Measures, including PPE, to protect against exposure to hazardous substances;
g. Emergency procedures for handling accidental releases of hazardous substances including:
   • Leaks and spills;
   • Fires;
   • Reporting emergencies; and
   • Use of first aid equipment.

h. Explanation of the labeling system;

i. Explanation of MSDS.

2. When significantly new hazardous chemicals are introduced in the workplace, employees will receive training on the hazards and control measures associated with those chemicals. This training can be conducted during a regular monthly safety meeting.

3. If new chemicals with similar hazards to other chemicals already in the workplace are brought in, training need not be repeated. However, employees should be encouraged to review the MSDS for the new chemicals.

4. If the new chemicals have significantly different hazards (e.g., replacing formalin with hydrogen peroxide), then additional training would be warranted.

5. Reviewed annually by all employees.

F. Recordkeeping

Documentation of initial Hazard Communication training shall be entered into the employee’s training record in i-Learn.

G. Responsibilities

1. Employees at ODFW sites shall:
   a. Use appropriate personal protective equipment, work practices, and engineering controls when handling hazardous chemicals;
   b. Not bring to the worksite chemical products that are not on the site’s chemical list.

2. Supervisors shall:
   a. Advise employees of the location of the Material Safety Data Sheets (MSDS);
   b. Ensure that employees are trained in the hazards of the materials they use on the job;
c. Review the physical and health hazards of materials introduced into the workplace and updating employee information and training as needed;
d. Ensure all containers are properly labeled;
e. Ensure contractors comply with the requirements of this HazCom program when working at ODFW sites.

3. Site Safety Officers shall:
   a. Establish and maintain a chemical list for the site;
   b. Ensure MSDS are obtained for all hazardous substances used, handled, or stored on the site;
   c. Assist supervisors in employee training;
   d. Provide assistance to supervisors in carrying out their duties.

4. Region Managers/Division Administrators shall ensure that all sites within their region/district are in compliance with this section.

5. The Safety and Health Manager shall:
   a. Assist in the development of training materials and training of employees;
   b. Monitor the regulations and ODFW compliance with such regulations;
   c. Provide assistance to supervisors and managers in carrying out the program.

Attachment A  Anatomy of a MSDS
Attachment B  Material Safety Data Sheet (sample)