

Hazard Communication Program

Policy

It is the policy of Lurie Children's to be in compliance with the Occupational Safety and Health Administration (OSHA) standard entitled "Hazard Communications and the Illinois Toxic Substances Disclosure Act". This policy applies to Manne Research Institute laboratories.

Purpose

The purpose of Lurie Children's Hazard Communication Program is to insure that the hazards of all chemicals and hazardous substances used in the workplace are evaluated; that hazard information is explained to employees who are exposed to them; and to reduce potential hazards by using non-toxic substitutes whenever possible. The goal of this program is to reduce the incidence of chemical source illnesses and injuries.

Responsibility

It is the responsibility of Principal Investigators at the research institute to insure that the requirements of the Hazard Communication Program are established, documented, and monitored.

Procedure

The Hazard Communication Program must include the following:

- I. Principal Investigators/ Laboratory Managers
 - A. Inventory
 1. Inventory all chemicals and hazardous substances used within the Department
 2. Maintain the inventory
 3. Send an inventory list to the Safety Officer with updates when necessary
 - B. Container Labeling
 1. Insure that containers of hazardous chemical and substances are labeled with the identity of the hazardous chemical(s), appropriate hazardous warnings, the name and address of the manufacturer
 2. Insure that all transfer containers are labeled as to the contents and appropriate hazard warnings
 3. Insure that labels are not removed or defaced
 - C. Education and Training
 1. Establish a Hazard Communication Program. Inform staff of Administrative Policy and Procedure #H-1
 2. Educate and train employees at the time of Department orientation, whenever a new hazard is introduced, and annually thereafter. Include at least the following:

- a. Description of Hazard Communication Program. Include location and availability
- b. A list of known hazardous chemicals/substances
- c. Explanation on how to read an MSDS
- d. Labeling requirements
- e. Information concerning the hazards presented by chemicals in the work area
- f. Explanation of any personal protective devices/equipment available to the employee
- g. Information concerning the hazards of non-routine tasks (i.e. clean up of chemical spills)
- h. Notification to contracted employees of the labeling procedure, the personal protective equipment required and where the MSDS's are filed

II. Safety Officer

A. Material Safety Data Sheets (MSDS)

1. Obtain MSDS for each hazardous chemical/hazardous substances
2. Review the MSDS to verify that they contain the required information
3. Insure that MSDS are available on all work shifts so that employees have access to them when needed

B. Inform Principal Investigators/ Laboratory Managers about significant health/safety information

C. Notify OSHA if a complete MSDS is not received from the manufacturer

D. Maintain education information

E. Assist with training programs as needed

F. Compliance

1. Conduct periodic monitoring for compliance with the Hazard Communication Program
2. Report non-compliance to the appropriate Principal Investigators/Laboratory Managers and Directors for corrective actions

III. Exemptions

- A. Any drugs regulated by the U.S. Food and Drug Administration (PDA) in the non-manufacturing sector except chemotherapeutic
- B. Hazardous and special waste
- C. Consumer goods when packaged and used by employees with no greater exposure than expected from consumer use
- D. Products intended for the personal consumption of employees