

- Policy:** DC Office of the Chief Medical Examiner (OCME) places a high value on the health and safety of its employees. This policy provides procedures regarding work operations in the agency where there may be exposure to hazardous chemicals under normal working conditions or during emergency situations.
- Purpose:** The purpose of this Hazard Communication Program is to ensure that the hazards of all chemical located in this facility are evaluated and that information concerning physical and health hazards are transmitted to employees who may be potentially exposed to these substances. This program serves to help the agency and employees comply with the Occupational Safety and Health Administration’s (OSHA) Hazard Communication Standard, 29 CFR 1910.1200.
- Scope:** The Hazard Communication Program applies all OCME employees whose job functions have the potential for work related injuries and disorders. Certain aspects of job tasks and work environments contain risk factors that may contribute to injury or disability. Through proper use of hazardous materials and an understanding by employees of hazard communication safety standards, potential injuries and disorders may be reduced, prevented and even eliminated.

## 1. INTRODUCTION

- 1.1. The OCME Hazard Communication Program is based on the requirements of the Occupational Safety and Health Administration’s (OSHA) Hazard Communication Standard, 29 CFR 1910.1200. Title 29 CFR 1910.1200 (e)(1) *Written Hazard Communication Program* states that “[e]mployers shall develop, implement, and maintain at each work place, a written hazardous communication program ...”

## 2. GENERAL AGENCY POLICY

- 2.1. The purpose of this document is to inform OCME employees that the agency is complying with the OSHA Hazard Communication Standard by:

- Observing all its requirements,
- Compiling a hazardous chemicals list for each unit,
- Using material safety data sheets (MSDS),
- Ensuring that all containers are labeled, and
- Providing appropriate training.

- 2.2. To ensure that information about the dangers of hazardous chemicals used by OCME is known by all affected employees, the hazardous information program has been

established. Under this program, employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of the chemicals with which they work; safe handling, storage and disposal procedures; the hazards associated with non-routine tasks (e.g., cleaning of chemical spills); the hazards associated with chemicals in unlabeled containers; and measures to take to protect them from chemical hazards.

- 2.3. This program applies to all work operations in the agency where there may be exposure to hazardous chemicals under normal working conditions or during emergency situations. All work units of the agency will participate in the Hazard Communication Program.
- 2.4. The Hazard Safety Officer (HSO) is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary. The HSO will review and update the program, as necessary. Copies of the written program may be obtained from the HSO, Chief Toxicologist, Deputy Chief Medical Examiner, Chief of Staff, Risk Safety Officer, Supervisory Pathologist Assistant (Mortuary Supervisor), Agency Risk Management Representative and Chief Medical Examiner.

### **3. LIST OF HAZARDOUS CHEMICALS**

- 3.1. The HSO will work with the Chief Toxicologist and Supervisory Pathologist Assistant to develop, update and maintain a list of all hazardous chemicals used in the facility. The list includes the name of the chemical, the manufacturer and the work area in which the chemical is used. It identifies the corresponding Material Safety Data Sheets (MSDS) for each chemical by using the *same* name as that used on the corresponding MSDS. For example, if the chemical label says "Formalin" on the container, information can be obtained about this chemical by referring to the MSDS listed under the name "Formalin". The labels of all chemicals and/or containers shipped to OCME from outside will also contain the name and address of the chemical manufacturer who can be contacted if additional information is desired.
- 3.2. A master list of all chemicals used at OCME is maintained by the agency. The hazardous chemical inventory is compiled and maintained by the Chief Toxicologist. When new chemicals are received, the list is updated (including date the chemicals were introduced) within 30 days. To ensure any new chemical is added in a timely manner, the Chief Toxicologist and Supervisory Pathologist Assistant are responsible upon receipt for updating the master list with new chemicals and completing a form with the date, name of chemical, manufacturer and work area the chemical will be used.

### **4. MATERIAL SAFETY DATA SHEETS**

- 4.1. The Chief Toxicologist is responsible for establishing and monitoring the OCME MSDS program, including ensuring that procedures are developed to obtain the necessary MSDSs. Further, this duty involves reviewing incoming MSDSs for new or significant

health and safety information and ensuring that any new information is communicated to affected employees.

- 4.2. MSDSs provide specific information on the chemicals in use. Each MSDS will be a fully completed OSHA Form 174 or the equivalent. The Chief Toxicologist or Supervisory Pathologist Assistant will contact the chemical manufacturer or vendor if additional information is necessary or if an MSDS has not been supplied with an initial shipment. When revised MSDSs are received, the Chief Toxicologist or Supervisory Pathologist Assistant ensure replacement of old MSDSs.
- 4.3. The HSO will work with the Chief Toxicologist and Supervisory Pathologist Assistant to ensure that each work area maintains an MSDS for the hazardous chemicals in that area, at a place where it is readily available to employees while they are at work. This information should be relayed to all employees working in these areas.

## **5. LABELS AND OTHER FORMS OF WARNING**

- 5.1. The HSO will work with the Chief Toxicologist and Supervisory Pathologist Assistant to ensure that all hazardous chemicals in the agency are properly labeled and updated, as necessary. At a minimum, all labels will list the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party.
- 5.2. Containers of products that include any hazardous chemicals that are shipped from OCME will be checked by the Chief Toxicologist, Supervisory Pathologist Assistant or an employee assigned to that responsibility, in order to make sure all containers are properly labeled.
  - 5.2.1. If there are a number of stationary containers within a work area that have similar contents and hazards, signs will be posted to convey the needed hazard information.
- 5.3. On any stationary process equipment (e.g., mortuary x-ray machine; histology tissue processor, etc.), it is common to substitute regular process sheets or similar written materials for container labels. However, these must contain the same information as the original labels. If used, these written materials will be readily available to employees during their work shift.
- 5.4. If employees transfer chemicals from a labeled container to a portable container that is intended for immediate use only, no labels are required on the portable container.
- 5.5. Pipes or piping systems do not have to be labeled but their contents should be described in training sessions. An exception to this is any gas line or piping containing flammable material (e.g., gas lines supplying the toxicology laboratory). If employees have any questions about pipes or their contents, they are to ask their supervisor.

## 6. NON-ROUTINE TASKS

6.1. Periodically, employees are required to perform non-routine tasks that are hazardous (e.g., cleaning chemical spills, entering confined spaces, etc.). When employee are required to perform hazardous non-routine tasks, special training will be provided in order to inform employees regarding the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure, as well as emergency procedures.

## 7. TRAINING

7.1. During orientation, employees who work with or are potentially exposed to hazardous chemicals will receive initial training from the HSO, or a person assigned to that responsibility, on the OSHA Hazard Communication Standard and the safe use of those hazardous chemicals to which they may be exposed.

7.2. A program that uses audiovisual materials, instructor-led or online training, and/or on-the-job training has been prepared for this purpose. The training program may vary among workers; however, every worker will be trained in the OSHA Hazard Communication Standard, the OCME Hazard Communication Program and all chemicals to which he or she may be exposed while at work.

7.3. Whenever a new hazard is introduced, additional training will be provided as appropriate. Regular safety meetings will also be used to review the information presented in the initial training. All supervisors will be extensively trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices.

7.3.1. If employees are ever unsure about what they should do or are uncertain about the consequences of any action they plan to take, they should **NOT ACT**, but should **immediately ask their supervisor**.

7.4. The training sessions will emphasize these items:

- Summary of the OSHA Hazard Communication Standard and the OCME Hazard Communication Program;
- Chemical and physical properties of hazardous materials (e.g., flammability, reactivity, toxicity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes);
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.);
- Health hazards, including routes of entry, signs and symptoms, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical;

- How to determine the presence or release of hazardous chemicals in the work area;
- Procedures to protect against hazards and exposures (e.g., personal protective equipment (PPE) required; proper use and maintenance of PPE; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response);
- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks;
- Where MSDSs are located, how to read and interpret the information on both chemical labels and MSDSs, and how employees may obtain additional hazard information; and
- Emergency and first aid procedures in the event of exposure to a hazardous chemical as specifically noted on the MSDS and as required in OSHA 29CFR 1910.151.

7.5. The HSO will regularly review the OCME employee training program and advise management on training or retraining needs. As part of the assessment of the training program, he or she will obtain input from employees regarding the training they have received, and their suggestions for improving it. If employees have any suggestions they are to inform their supervisor or the HSO, who will see to it that they are provided to the appropriate party.

7.6. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace. It is also agency policy to provide training whenever it is needed to whoever needs it. If employees do not think they are fully or properly trained, or feel they need additional training in any aspect of their job or work environment, they are to report this to their supervisor or HSO.

## **8. PROPER STORAGE OF CHEMICALS**

8.1. Hazardous materials must be stored in compliance with National Fire Protection Association (NFPA) and OSHA requirements.

## **9. OTHER EMPLOYEES/CONTRACTORS**

9.1. Upon notification by the responsible supervisor, the HSO, or a person specifically designated for the purpose, will provide employees of other District agencies, outside contractors or others with OCME business with notice of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and the location and availability of MSDSs.

9.2. It is the responsibility of the HSO to obtain information about hazardous chemicals used by other employers to which employees of OCME may be exposed. Each contractor bringing chemicals on-site must provide the HSO and responsible supervisor with the appropriate hazard information on those substances, including the labels used and the precautionary measures to be taken in working with those chemicals.

**10. ADDITIONAL INFORMATION**

- 10.1. All employees, or their designated representatives, can obtain further information on this written program, the OSHA Hazard Communication Standard, applicable MSDSs, chemical information lists and any other safety or health matter that may interest or concern them from the HSO.