

Children’s Hospital and Health System Safety Policy and Procedure

This policy applies to the following entity(s):

Fox Valley Hospital

SUBJECT: Hazard Communication Program

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Definitions

Global Harmonized System (GHS) is an international approach to hazard communication, providing agreed criteria for the classification of chemical hazards, and a standardized approach to label elements and safety data sheets. The GHS provides harmonized classification criteria for health, physical, and environmental hazards of chemicals.

Safety Data Sheet (SDS) is formerly known as a Material Safety Data Sheet (MSDS) and provides chemical information such as chemical properties, hazards, and safe handling information. The SDS is made up of 16 sections which are internationally standardized as part of the GHS.

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Pictograms are a component of GHS that standardize workplace hazard warning and can be found on SDSs and chemical labels. See Appendix A for current list of pictograms.

Physical Hazard is a chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

Health Hazard is chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Safe Work Practices are procedures that are enacted to minimize the risk of an employee being exposed to hazardous chemicals.

Mechanical/Engineering Controls are systems put in place to eliminate or reduce employee exposure to hazardous chemicals. Mechanical system includes but not limited to the use of fume hoods, negative pressure air systems and self-contained equipment. Engineering systems included but not limited to secondary containment, appropriate transportation equipment, and chemical containment cabinets.

Personal Protection Equipment (PPE) is safety equipment worn by employees to protect them from direct contact with hazardous chemicals. PPE recommendations appears on the SDS and/or from the manufacture of the chemical. PPE includes but is not limited to eye protection, skin protection and respiratory protection.

POLICY

I. Hazard Communication Program

1. It is the policy of Children's Wisconsin – Fox Valley (FV) to comply with the Occupational Health and Safety Administration ("OSHA") Hazard Communication Standard 29 CFR 1910. 1200 and to provide a safe working environment for employees, students, patients and their visitors. Employees have the following rights:
 - a. The right to request, in writing, and obtain information on hazardous chemicals, which they may come in contact with at the Hospital.
 - b. The right to be informed of the hazardous chemicals used in their work area.
 - c. The right to have access to the Hospital's written Hazard Communication Program.
 - d. The right to file a complaint with OSHA if the employee believes that he has been discriminated against due to the exercising of his rights under this standard.

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2. Departments/Clinics will maintain an inventory of chemicals used or stored within their workspace.
3. FV collaborates with Thedacare Medical Center – Neenah (TCN) on compliance to the Hazard Communication Program,
 - a. Routine chemicals used by TCN in CW-FV leased spaces are included on CW-FV chemical inventory and has SDS added to the Children’s Wisconsin MSDSonline database.
 - b. Non-routine chemicals used by TCN in Children’s Wisconsin FV spaces are controlled by TCN staff and removed from FV leased spaces when not in use.
 - c. FV and TCN provides access to each organization’s chemical inventories and SDS as need.
4. FV provides different methodologies to protect employees from exposure to hazardous chemicals. It is the responsibility of department/clinic leadership to determine what methods are applicable, train employees on their use, and ensure measures or equipment are maintained in working condition.
 - a. Safe work practices
 - b. The use and maintenance of mechanical or engineering equipment to limit the exposure of hazardous chemicals.
 - c. Personal Protective Equipment (PPE)
 - i. when PPE is necessary
 - ii. what PPE is necessary
 - iii. how to properly put on, remove, adjust and wear PPE
 - iv. useful life and limitations of PPE
 - v. proper care, maintenance and disposal of PPE
 - d. Emergency response
 - i. use of eye wash stations and showers
 - ii. spill response procedure (Hazardous Spill)
 - iii. other immediate treatment as indicated on SDS

II. **SDS Program**

1. All hazardous chemicals used in FV have a SDS available to employees through Children’s Connect intranet site under “Employee Resources” tab. See Appendix B for detailed instructions.
2. Children’s Wisconsin utilizes MSDSonline database to manage and make SDS readily available. In the case of an internet failure, SDS are available to be faxed through MSDSonline fax back service by calling 888.362.7416.
3. SDS(s) should be available on MSDSonline prior to the product being used within the department.
 - a. Department/Clinic leadership is responsible to review the SDS and determine that the appropriate storage and handling measures are in place including identified personal protective equipment (PPE).

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- b. Department/Clinic leaders who introduce a new chemical or hazardous material are responsible to verify a SDS is online or have it added to the system. See Appendix C for detailed instructions.
4. Milwaukee (MKE) Environmental Services (EVS) Director oversees the maintenance of the MSDSonline database.

III. Labeling Program

1. FV relies on the manufacturer and/or vendor to determine the hazards associated with their products and ensure they are properly labeled.
2. The following information needs to be present on labels.
 - a. Product identifier.
 - b. An appropriate signal word, hazard statement, pictogram or precautionary statement.
 - c. Name, address and telephone number of the manufacturer, importer, or other responsible party.
 - d. Appropriate hazard warnings to include: health hazards, physical hazards, target organs and effects, and personal protective equipment.
3. FV will contract with a third-party source to make a hazard determination on a chemical for which no SDS is available or is generated by FV.
4. It is the responsibility of Children's Wisconsin or TCN Material Services and department/clinic leadership to ensure all chemical products are appropriately labeled prior to their use.
 - a. Any chemical not properly labeled will not be accepted for delivery.
 - b. Suppliers of solid metal materials, which may emit hazardous substances when worked on, are required to supply labels with the first shipment of that material.
5. When materials are transferred from a labeled container to another container, the receiving container must be labeled. It is the responsibility of the department/clinic to ensure all secondary containers are properly labeled.
 - a. When possible, a new label from the manufacture or vendor should be requested and applied to the secondary container.
 - b. All labels developed in-house will derive their information from the labels of the incoming containers and the SDS and will contain the following:
 - i. Identity of the hazardous chemical contained therein.
 - ii. Appropriate hazard warnings:
 1. physical hazards
 2. health hazards
 3. route of entry
 4. target organs
 5. date of transfer
 - iii. Portable containers into which hazardous chemicals have been transferred are exempt from the secondary labeling requirements when **ALL** of the following occurs:
 1. The employee transferring the chemical to the portable container is the same as the person who is using the chemical.
 2. At minimum the container is marked with the product content.

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3. The chemical container is used only during the shift that the employee is working.
4. The portable container is in control of the employee during the entire shift or secured when not in use.
5. The portable container content is used up completely during the employee shifts, returned to its original container, disposed of or properly labeled.
6. Any chemical product that cannot be readily identified should be turned in to department leadership indicating where chemical was found. Department/Clinic leadership should:
 - a. Attempt to identify chemical with employees in the work area
 - b. Consult with TCN EVS and/or TCN Security & Safety to identify chemical.
 - c. Turn over to TCN Security & Safety to work with their hazardous waste hauler to identify or properly dispose of chemical.

IV. Training

1. All employees receive information and training so that they are informed of the requirements the standard and are trained in regard to hazards in their work area.
2. Training is required throughout employment
 - a. Initial training is to be provided in conjunction with new employee orientation managed by Human Resources.
 - b. Department/clinic specific training is provided by department/clinic leadership and occurs:
 - i. Upon hire to identify potential hazardous chemicals that employees may come in contact with, how to use, and required PPE.
 1. When process change and new hazardous chemicals are introduced or if new information is made available on an existing chemical or product that would make it classified as a hazard.
 2. When an employee transfers from another department.
 - c. Annual program review is provided by the education department through the safety education annual safety review.
 - d. Training Elements
 - i. Requirements of the Hazard Communication Standard.
 - ii. The location of the Hospital's Hazard Communication Program.
 - iii. Instructions for using Safety Data Sheets.
 - iv. Location of the Chemical Inventory List(s).
 - v. Explanation of the labeling system.
 - vi. Notification of any operations in their work area where hazardous chemicals are present.
 - vii. Methods of observation which may be used to detect the presence or release of a hazardous chemical in the work area.
 - viii. The physical and health hazards of the chemicals in the work area.
 - ix. The measures employees can take to protect themselves from these hazards, including specific procedures which the Hospital has implemented to protect employees from exposure to hazardous chemicals, such as

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- appropriate work practices, emergency procedures and personal protective equipment to be used.
- e. Department/clinic leaders are responsible to ensure that employees under their supervision are:
 - i. Informed of and have access to the Hospital's Hazard Communication Program.
 - ii. Able to access appropriate SDS's on any work shift.
 - iii. Aware and utilize available PPE and that the employee knows how to properly use provided PPE.
 - iv. Aware that engineering controls, such as ventilation, are in place and operating properly.
 - v. Have knowledge of which substances, in their work area, are hazardous and the location of a current list of these substances.
 - f. The EOC Committee provides assistance to departments in the planning, development and/or implementation of department specific training needs.

V. Non-Routine Tasks

1. All persons involved in non-routine tasks are informed of hazards associated with such tasks prior to assignment. Department/Clinic leadership will:
 - a. Determine what hazards are present or may be created by the task.
 - b. Communicate information about the hazard to employees.
 - c. Make sure that any special equipment, such as portable ventilation systems and/or personal protective equipment, is available and used to perform the task.

VI. Contractor and Vendors

1. Contractors/vendors and their employees will be informed of hazards before performing work on CW property and contractors will inform CW-FV of any hazardous materials that are brought into the Hospital.
2. The department/clinic working with the contractor/vendor are responsible to ensure information is shared.
 - a. SDS
 - b. Mitigation activities to protect against hazardous chemicals during normal and emergency use
 - c. Labeling and emergency notification for spills and/or exposures.
3. CW reserves the rights to limit or ban certain hazardous chemicals from being used in any location as deemed by the EOC Committee or Environmental Safety Officer (ESO).

VII. Hazard Communication Program Exemptions

1. Hazardous waste regulated by the Environmental Protection Agency.
2. Tobacco or tobacco products.
3. Wood or wood products which will not be processed. (Wood or wood products which have been treated with a hazardous chemical and wood which may be subsequently sawed or cut, generating dust, are not exempt).

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4. Articles which would not emit a hazardous substance if worked upon.
5. Food, drugs, cosmetics or alcoholic beverages for personal consumption.
6. Consumer or hazardous substances used in the same manner, frequency and duration as does a normal consumer. OSHA intends to read this exemption narrowly. A Safety Data Sheet must be obtained if it is determined that these products are used more frequently than would a normal consumer.
7. Any hazardous waste as such term is defined by the Solid Waste Disposal Act.
8. Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 302 et seq.), when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies).

VIII. Documentation

1. Documentation of the Hazard Communication Program is maintained by the MKE EVS Director and the Children's Wisconsin ESO.
2. Documentation of new hire general orientation training is maintained by Human Resources
3. Documentation of departmental training is maintained by Department Leadership.
4. Documentation of annual safety education is maintained through Educational Services.

PROCEDURE

I. FV EOC Committee, MKE EVS Director and/or Children's Wisconsin ESO

1. Hazard Communication Program
 - a. Reviews annually the program
 - i. Develops and maintains written program.
 - ii. Audits implementations of the program to identify opportunities for improvements.
 - b. Works with employees that have questions or concerns related to the program.
2. Chemical Inventory
 - a. Evaluates annual departmental inventories for completeness
 - b. Provide consultation to departments on question related to chemicals on the inventory.
 - c. Works with TCN on information sharing between the two entities.
3. SDS
 - a. Maintains master MSDSONline database.
 - b. Audits chemicals to ensure SDS is accessible on MSDSONline.
 - c. Provide guidance to departments on the acquisition of SDS for new products.
 - d. Works with employees that have questions or concerns related to a chemical products SDS.

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- i. If needed, consults with Children's Wisconsin Employee Health and Wellness.
 - ii. If needed, consults with manufacturer or recognized first responder agency.
- 4. Labeling
 - a. Audits products to ensure labels are displayed and include required information.
- 5. Training
 - a. Approves orientation and annual education content.
 - b. Provides support to departments with the development of training.

II. **Directors/Managers/Supervisors**

- 1. Hazard Communication Program
 - a. Ensure employees are aware how to access the program and who to contact with questions and concerns.
 - b. Provide feedback to the EOC Committee on any issues related to the program.
 - c. Identify, maintain, and enforce the appropriate use of PPE for identified hazards.
- 2. Chemical Inventory
 - a. Maintain the departmental chemical inventory. At minimum, inventory needs to be reviewed annually and submitted to the EOC Committee for review. EOC Committee will identify the timeframe the audit needs to be completed by.
 - b. Ensure chemical inventory is available to employees.
- 3. SDS
 - a. Ensure SDS are available on MSDSonline
 - b. Ensure employees are able to access MSDSonline during normal and emergency conditions
 - c. Add new SDS to MSDSonline system when new chemicals are introduced to department. See Appendix C for detailed instructions.
 - d. Evaluate and update SDS during chemical inventory annual review.
- 4. Labeling
 - a. Ensure all chemical products are properly labeled with the manufacturer's label or a secondary label that meets requirements.
 - b. Remove from service any unlabeled chemicals found in department.
 - i. Notify TCN EVS or Safety to properly dispose of the chemical.
- 5. Training
 - a. Provide training to new and temporary employees
 - i. Location and items on chemical inventory
 - ii. Specific use, storage and PPE training for hazardous chemicals that the employees will be using or may come into contact with.
 - iii. How to access SDS
 - iv. Whom to contact with questions or concerns with the program.
 - b. Provide departmental training when any of the following occurs:
 - i. An existing hazardous chemical has new information provided on its hazard.
 - ii. A new chemical is introduced or existing chemical is used in different way.
 - iii. A substitute product is provided.
 - c. Maintain department/clinic training documentation for each employee.

III. Employees

1. Hazard Communication Program
 - a. Be familiar with the program
 - b. Know who to contact with question and concerns
 - i. Department Leadership
 - ii. EOC Committee, ESO and/or CW EVS Director
 - iii. Employee Health and Wellness for exposure or health concerns.
 - iv. OSHA when answers or concerns are not resolved by the above groups
 - c. Properly utilize identified safe work processes, mechanical/engineering systems and/or PPE.
2. Chemical Inventory
 - a. Awareness of chemical located in the department or utilized during your work shift.
3. SDS
 - a. Be able to access SDS during your work shift
 - i. Normal access is through Children's Connect intranet page. Link is located under the "Employee Resource" tab.
 - ii. If internet service is down or in emergency situations, SDS is available through MSDSonline Fax on Demand service.
 1. Have product with you when calling. Will need at minimum the name of the product and manufactures.
 2. Have fax phone number for where you want the SDS sent to
 3. Call MSDSonline at 888.362.7416
 - iii. If you are not able to find an SDS, contact your immediate supervisor for assistance.
 - iv. Address any questions you have with a SDS with your supervisor.
4. Labeling
 - a. Do not utilize any chemical product that does not have the appropriate label.
 - b. Turn in any unlabeled chemical products to your immediate supervisor.
 - c. Do not transfer any chemical products into a secondary container unless the following occurs:
 - i. You are trained to use the product in a properly secondary labeled container.
 - ii. You are trained to utilize the exemption to labeling a secondary container as identified in the policy above.
5. Training
 - a. Complete new employee orientation and departmental specific training prior to working with any chemicals located within the workplace.
 - b. Request proper training if you asked to use a product that you are not familiar with or have received previous training.
 - c. Participate in departmental and annual training.

SUPPORTING DOCUMENTS

Fox Valley - Hazardous Materials Emergency P&P

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REFERENCES

29 CFR 1910.1200 Hazardous Communications

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Appendix A: GHS Hazardous Communications Pictograms

<p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) <ul style="list-style-type: none"> • Skin Sensitizer • Acute Toxicity (harmful) <ul style="list-style-type: none"> • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/ burns • Eye Damage • Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p>Flame over Circle</p>  <ul style="list-style-type: none"> • Oxidizers 	<p>Environment *(Non Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

Appendix B: MSDSonline Quick Reference Guide

❖ Accessing your Account:

1. Access through Children's Connect intranet site at <https://connect.chw.org/>.
2. Click on "Employee resource" tab in blue band at top of page and select "Safety Data Sheets"
3. Or enter "SDS in Search box.
4. Either step 2 or 3 will open the "Safety Data Sheets (SDS) Reference" page.
5. Click on the "MSDSonline" link

❖ To Search for an MSDS within your company: MSDS Search



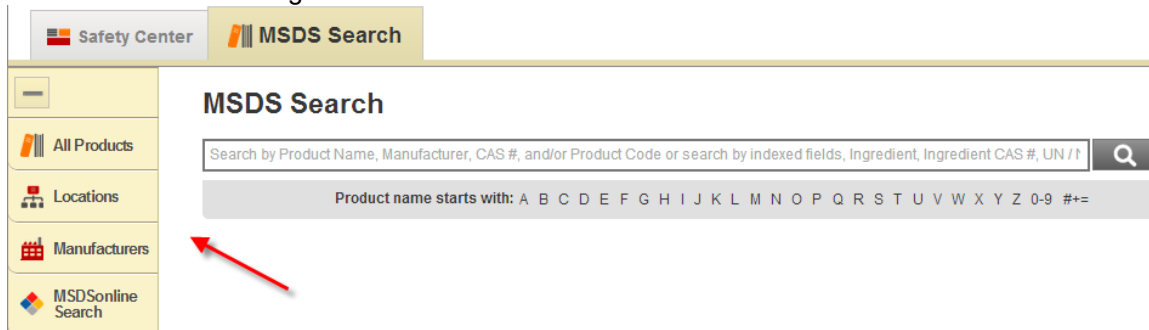
Search by Product Name, Manufacturer, CAS #, and/or Product Code or search by indexed fields, Ingredient, Ingredient CAS #, UN / I

Product name starts with: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z 0-9 #+=

1. Type the product information into the single search field and click Search.

Hint: You can search for multiple types of data at once. For example, if you are searching for Acetone manufactured by Sigma, you can type in Acetone Sigma in the single search field to search for both product and manufacturer.

2. If you are not able to spell the product name, click on the 1st letter of the product name to search for documents that begin with that letter.



Safety Center MSDS Search

MSDS Search

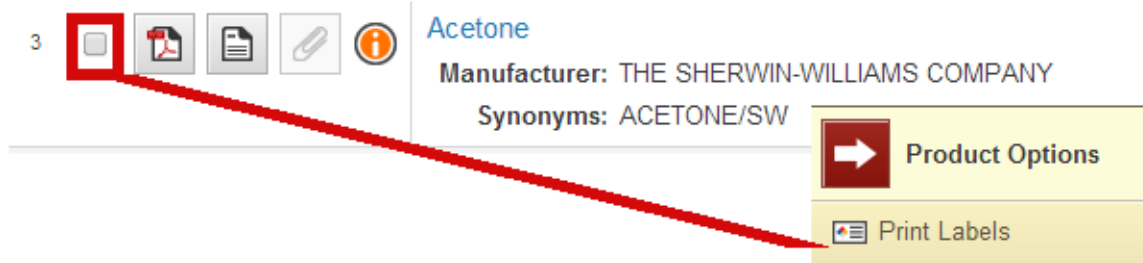
Search by Product Name, Manufacturer, CAS #, and/or Product Code or search by indexed fields, Ingredient, Ingredient CAS #, UN / I

Product name starts with: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z 0-9 #+=

All Products
Locations
Manufacturers
MSDSonline Search

3. To see a full display of documents by Product Name, by Location, or by Manufacturer, click on one of the tabs to the left of the search field.

❖ **Once the MSDS has been found:**



1. View the MSDS by selecting the PDF icon to the left of the Product Name. You can print or save the MSDS after viewing the PDF.
2. View the summary of the MSDS by selecting the Summary icon next to the PDF.
3. Print labels for secondary containers by checking the box to the left of the PDF icon.

When the Product Options tray appears, select the Print Labels option.

- a) Choose your label by clicking on one of the available options
- b) Select the Label Size, Hazard Symbol and Data Fields you would like to include on your label
- c) Select the desired Print Option and Label Position
- d) Select "Generate Label"

4. View Attached Files by selecting the paper clip icon next to the Label.

If you are not able to find a document in your company's database, you will be prompted to either search MSDSONline for the document (where you can then view the MSDS and/or add it to the company database) or use the request tool to obtain an MSDS from your Administrator.

EMERGENCY SDS FAX BACK SERVICE: 888.362.7416

In case of internet or computer failure, Safety Data Sheets (SDS) can be requested to be faxed from MSDSONline. Please have product information and fax number to send SDS to available when you call.

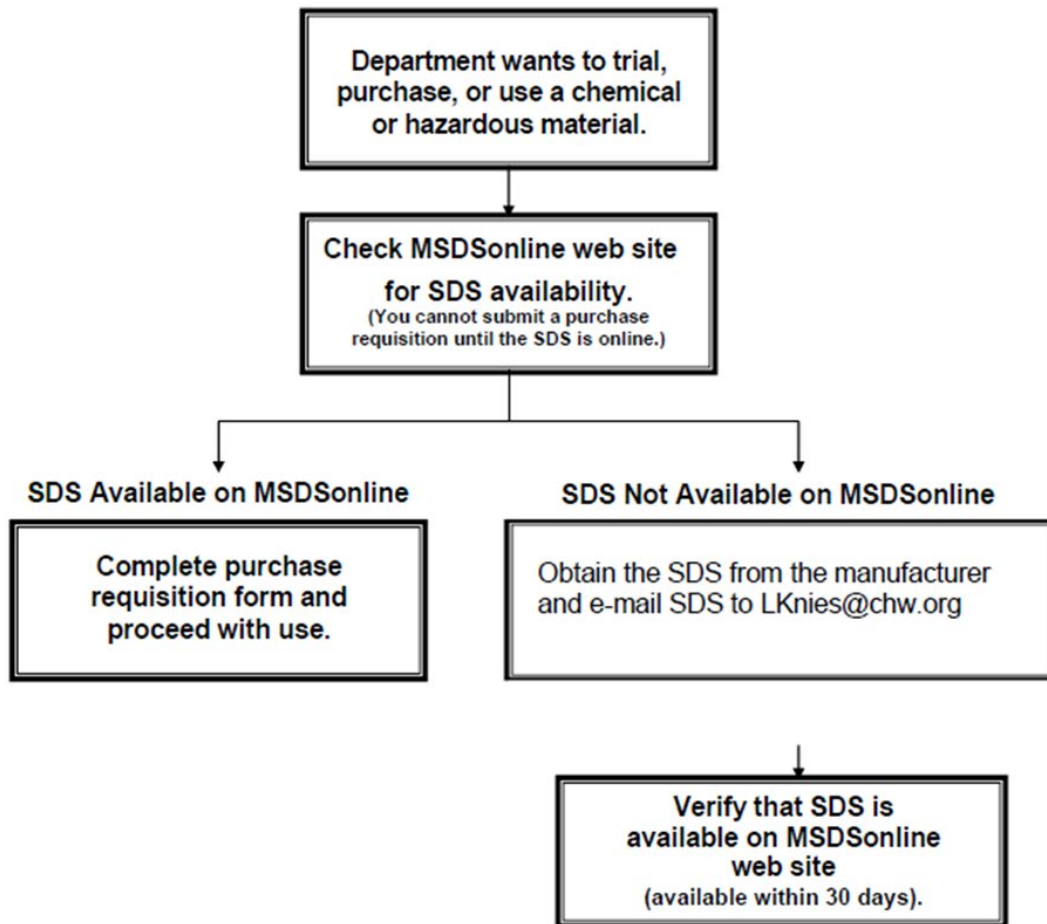
Appendix C: Adding Safety Data Sheets (SDSs) to MSDSonline

Safety Data Sheets SDS, formerly MSDS

Adding Safety Data Sheets (SDSs) to MSDSonline® Database

When a department trials or uses a new chemical or other hazardous material, it is the department leader's or designee's responsibility to check the SDS database for the corresponding SDS.

IMPORTANT! A hazardous chemical cannot be on site until an SDS is available.



If an SDS is not available, call the Environmental Services Director at 414.266.2152.