

HAZARD COMMUNICATION PLAN
LIFE TOUCH HOSPICE – EI Dorado
April 01, 2007

Overview

The purpose of CFR, Title 29, Part 1910.1200, Hazard Communication Standard (HCS) is to ensure that the hazards of all produced or incorporated chemicals are evaluated and the information concerning these hazards is transmitted to both employers and employees.

The standard mandates the evaluation of hazardous chemicals present in a workplace and requires training of employees regarding the hazardous chemicals and related prevention and protective measures for routine and non-routine tasks.

The Hazard Communication Plan

- The Hazard Communication Plan (HCP) consists of four major components:
 1. Identification and inventory of all hazardous chemicals and listing on a Hazardous Chemical List (HCL) (Attached as Exhibit A).
 2. Acquisition of Material Safety Data Sheets (MSDS) for each hazardous chemical listed on the HCL.
 3. Labeling of all hazardous chemicals with chemical name, hazards and warnings and the manufacturer's or importer's name and address, with reference to the appropriate Material Safety Data Sheet.
 4. Training of all employees about the hazardous chemicals in the workplace and of the Hazard Communication Plan.
- The SHARE Maintenance Director is the coordinator for the Hazard Communication Plan.
- Copies of the Hazard Communication Plan and the Hazard Communication Standard will be maintained in each department and available upon request of your Executive Director.

Hazardous Chemicals List

- The SHARE Maintenance Director will have responsibility for identifying and inventorying all hazardous chemicals in your facility. The Inventory Coordinator will be responsible to provide updated information to the SHARE Maintenance Director.
- A current master list will be maintained at all times. New chemicals will be added as they are received and chemicals no longer inventoried will be removed from the list as they are discarded. A formal inventory and updating of each facility list will be done annually.
- Each hazardous chemical must be cross-referenced to an appropriate Material Safety Data Sheet.
- The master HCL will be maintained in the SHARE Maintenance Director's office. Partial lists will be maintained in the various departments where hazardous chemicals are used.
- A list of all known hazardous chemicals used by our employees is attached to this plan. The list includes the name of the chemical, the manufacturer, the work area in which the chemical is used, dates of use, and quantity used. Further information on each chemical may be obtained from the MSDS located in the SHARE Maintenance Director's office in Life Touch Hospice.
- When new chemicals are received, this list is updated within 30 days and a copy is provided to the SHARE Maintenance Director for the master HCL. To ensure any new chemical is added in a timely manner, the following procedures shall be followed:

All chemical orders are placed through the Inventory Coordinator

All MSDS are requested at the time of the order

All MSDS are placed in the Maintenance Director mail slot when received

Material Safety Data Sheets (MSDS)

- The Hazard Communication Standard requires that MSDS be available to all employees for each hazardous chemical identified and used. If the employer receives a chemical container labeled as a hazard, an MSDS is required.
 - The SHARE Maintenance Director will be responsible for acquiring and maintaining updated versions of all MSDS at your facility. He / she will also be responsible for training of all employees, and documentation, regarding any new or updated MSDS.
 - The MSDS will be written in English and will consist of all information listed on OSHA Form 174, including the specific chemical identity and common names.

- All new procurements of hazardous chemicals should be evaluated and, whenever possible, the least hazardous substance will be purchased.
- Purchase orders for hazardous chemicals should include a request for a current MSDS.
- Hazardous chemicals should not be incorporated into any work process until an MSDS has been received and reviewed by employees exposed to the chemical.
- Accessibility of Material Safety Data Sheets.
 - A current MSDS library will be maintained for all hazardous chemicals identified and listed on the HCL and are located at:
 - Life Touch Hospice House Nurse Stations
 - Life Touch Homecare Administration building workroom
 - The MSDS will be readily available to all employees during each work shift.
 - If a new MSDS contains changes or new information, the old MSDS will be replaced with the new one in both the master file (at SHARE) and the facility file(s). Affected personnel will review updated or modified MSDS.

Labels and Other Forms of Warning

- The SHARE Maintenance Director will verify that all containers of hazardous chemicals will be clearly labeled with at least the following information:
 - Identity of the hazardous chemical;
 - Appropriate hazards and warnings (including target organ effect); and
 - Name and address of the manufacturer.
- ***Where the manufacturer's label provides this information, it shall be used in lieu of an in-house label.***
- The appropriate MSDS will be reviewed by the SHARE Maintenance Director to verify the warning label.
- Unlabelled containers should not be used.
- All primary and secondary containers will be regularly checked and verified that labels have not been defaced or removed and the information contained on them is current.

Training and Communication

- Prior to an assignment, each employee who works with or is potentially exposed to hazardous chemicals will receive training on the Hazard Communication Standard and the specific use of applicable hazardous chemicals in their work area.
- Prior to the introduction of a new hazardous material or updated hazard, each employee will be trained concerning specific use or handling procedures.

- Training will emphasize the following elements:
 - A summary of the Hazard Communication Standard and Hazard Communication Plan.
 - Hazardous chemical properties, including visual appearance and odor and methods that can be used to detect the presence or release of hazardous chemicals.
 - Physical and health hazards of the chemicals in the work area (including signs and symptoms of exposure) and any medical conditions known to be aggravated by exposure to the chemical.
 - Procedures to protect against hazards, including:
 - Personal protective equipment required.
 - Proper use and maintenance.
 - Work practices or methods to assure proper use and handling of chemicals.
 - Emergency response procedures.
 - Work procedures to follow to assure protection when cleaning hazardous chemicals and leaks.
 - Location of MSDS, interpretation of their contents and labeling information, as well as instructions for employees in how to obtain and use appropriate hazard information.
 - Explanation of the labeling system and instructions for preparing secondary container labels.
- Employee training will be documented and monitored for use in identifying training needs.
 - Retraining is required when a chemical hazard changes or when a new hazard is introduced into the workplace. It will also be company policy to include hazard communications into regularly scheduled staff meeting agendas.
 - The training program will be assessed by obtaining input from employees regarding training they have received and their suggestions for improvement.

Non-Routine Tasks

- Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are:
 - Custodial duties for non-custodial employees such as cleaning up body fluids from visitors and/or guests
- Prior to starting work on such projects, each affected employee will be given information by their 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 company is taking to reduce the hazards.

Other Employers / Contractors

- It is the responsibility of the SHARE Maintenance Director to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees.
- It is the responsibility of the SHARE Maintenance Director to obtain information about hazardous chemicals used by other employers to which employees of this company may be exposed.
- Other employers and contractors will be provided a copy of the MSDS book of hazardous chemicals used by this facility. In addition to providing a copy of the MSDS book, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this company.
- Other employers will be informed of the hazard labels used by the company. If symbolic or numerical labeling systems are used, the other employees will be provided with information to understand the labels used for hazardous chemicals for which their employees may have exposure.

Program Availability

A copy of this program will be made available, upon request, to employees and their representatives by contacting the Human Resources Department at (870) 881-9015.