

Department of the Army
Medical Department Activity
Fort Huachuca, Arizona 85613-7079

MEDDAC Memorandum
No. 385-2

05 March 2008

Safety

THE MEDDAC HAZARD COMMUNICATION (HAZCOM) PROGRAM

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1. History. This issue publishes a revision of this publication.

2. Purpose. This Memorandum prescribes policies, procedures, and responsibilities for administration of the HAZCOM Program with the MEDDAC, the DENTAC and Veterinary Services (VS). This Memorandum establishes a HAZCOM program to:

2.1 Reduce the incidence of injury and illness caused by hazardous chemicals in the workplace.

2.2 Identify and evaluate chemical hazards.

2.3 Establish uniform requirements for communicating information about chemical hazards to both management and workers.

2.4 Ensure compliance with 29 Code of Federal Regulations (CFR) 1910.1200.

3. Scope. This Memorandum applies to all patients, visitors, staff and tenants at the U.S. Army Medical Department Activity (MEDDAC), USA Dental Command (DENTAC) and, USA Veterinary Services (VS), Fort Huachuca, Arizona. (Here after referred to as MEDDAC collectively.)

4. References.

4.1 Code of Federal Regulations (CFR), Title 29, Labor, Part 1910, Section 1200, (29 CFR 1910.1200), Hazard Communication.

*This Memorandum Supersedes MEDDAC MEMO 385-2, Dated 24 January 2005

4.2 29 CFR 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories.

4.3 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances

4.4 DODI 6050.5, DOD Hazard Communication Program.

4.5 DOD 6050.5-L, Hazardous Material Information System.

4.6 AR 40-5, Preventive Medicine.

4.7 AR 385-10, The Army Safety Program.

4.8 AR 700-141, Hazardous Materials Information Resource System.

4.10 MEDDAC Memorandum 200-1, Hazardous Material and Hazardous Waste Management Program

5. Responsibilities.

5.1 The MEDDAC Commander will:

5.1.1 Implement and maintain an effective HAZCOM Program, in accordance with (IAW) 29 CFR 1910.1200.

5.1.2 Appoint a HAZCOM Program Manager in writing with the staff responsibility for oversight of the program.

5.1.3 Ensure commanders, directors, and managers of outlying clinics will appoint , on orders, an individual responsible for oversight of the HAZCOM program and develop clinic-specific standing operating procedures (SOPs).

5.1.4 Ensure any work performed in the MEDDAC, whether by internal or external agencies, be in compliance with the HAZCOM Program.

5.2 The MEDDAC Safety Officer will:

5.2.1 Serve as HAZCOM Program Manager and monitor the program for implementation and compliance.

5.2.2 At least annually, perform workplace inspection and surveys to determine compliance with the program.

5.2.3 Provide general HAZCOM training to all personnel who have potential exposure to hazardous chemicals and materials on the job.

5.2.4 Review hazardous chemical inventories, locations and amounts during environmental surveys of the medical treatment facility (MTF).

5.2.5 Report HAZCOM program compliance to the Safety Committee at least annually.

5.2.6 Report HAZCOM violations and deficiencies to the clinic/area Chief of the section and Safety NCO for corrective action.

5.2.7 Monitor the currency of appointment orders for clinic/area Safety NCOs during environmental surveys.

5.2.8 Maintain a master chemical list for MEDDAC, DENTAC and VS.

5.2.9 Conduct general HAZCOM training for all newly assigned personnel utilizing AMEDD Personnel Education and Quality System (APEQS).

5.2.10 Provide full support and assistance to the Hazardous Materials/Hazardous Waste Program.

5.2.11 Provide information on the types of personal protective equipment (PPE) required.

5.2.12 Coordinate annual chemical inventory updates.

5.3 Chief, Materiel Branch will:

5.3.1 The Chief, Materiel Branch will manage the movement and maintenance of hazardous materials from the time products are received from the manufacturers or suppliers until they are delivered to the customers, and will ensure Material Safety Data Sheets (MSDS) are received and distributed. Logistics Division does not store hazardous chemicals.

5.3.2 Ensure hazardous chemicals are properly labeled prior to issuing to customers.

5.3.3 Ensure MSDS are received with all hazardous chemicals procured through logistics. Provide a copy of MSDS the Safety Office and to user.

5.4 Chief, Preventive Medicine Service will ensure:

5.4.1 Annual surveys are conducted of all workplaces where employees are potentially exposed to hazardous chemicals as part of the Department of Defense Occupational and Environmental Health Readiness System – Industrial Hygiene (DOEHRS-IH)

5.4.2 The HAZCOM Program Manager (Safety Officer) and Hazardous Materials/Hazardous Waste Program Manager (Chief, Materiel Branch) receive a copy of the workplace DOEHRs-IH Summary Report.

5.4.3 Information is provided on the types of personal protective equipment (PPE) required.

5.4.4 Technical assistance and interpretation of MSDS, workplace monitoring, and required medical surveillance information is provided to supervisors and workers.

5.5 Chief, Mobilization, Education, Training and Security (METS) will:

5.5.1 Provide administrative support (that is, scheduling and classroom support for HAZCOM training).

5.5.2 Establish, maintain and monitor a data base of personnel who have had HAZCOM training.

5.5.3 Report the HAZCOM training status to the Safety Committee quarterly.

5.5.4 Ensure integration of HAZCOM Training in APEQS.

5.5.5 Establish and monitor a personal database on annual HAZCOM training (APEQS).

5.6 The Hazardous Materials/Hazardous Waste Program Manager will:

5.6.1 Interface closely with the MEDDAC/DENTAC/VS Safety Officer and Industrial Hygiene regarding hazardous material activities as appropriate.

5.6.2 Assist employees with identification of hazardous chemicals and materials.

5.7 The Environmental Science Officer will:

5.7.1 Assist the HAZCOM program manager with training and other HAZCOM related issues as necessary.

5.7.2 Interface closely with the MEDDAC/DENTAC/VS Safety Officer and Industrial Hygienist regarding hazardous material activities as appropriate.

5.8 The Industrial Hygienist (IH) will:

5.8.1 Conduct annual surveys of all workplaces where employees are potentially exposed to hazardous chemicals and materials as part of DOEHRS-IH.

5.8.2 Provide the HAZCOM Program Manager and Hazardous Materials Program Manager a copy of the workplace DOEHRS-IH Summary Report.

5.8.3 Provide information on the types of personal protective equipment (PPE) required.

5.8.4 Evaluate the health hazards presented by the introduction of new potentially hazardous chemicals in the workplace.

5.8.5 Provide technical assistance and training to healthcare workers, the Safety Officer, and Hazardous Materials (HM) Program Manager when requested.

5.9 Supervisors will:

5.9.1 Appoint a Safety NCO and an Alternate Safety NCO to manage their departmental HAZCOM program and forward a copy to the Safety Office.

5.9.2 Support and coordinate the implementation of the HAZCOM Program as required.

5.9.3 Ensure the inclusion of the HAZCOM Program in the departmental Safety SOP.

5.9.4 Screen requests for hazardous materials generated by the activity to ensure only necessary materials are ordered and only minimum quantities are used to satisfy operational needs.

5.9.5 Ensure annual clinic/area-specific training is provided and received by personnel (to include contract employees) who require it, and that this training is recorded in the individuals' competency assessment folders (MEDDAC). The DENTAC and Veterinary Service will record all training in the unit safety binders.

5.9.6 Ensure the Hazardous Chemical Inventory (HCI) is updated annually or when there is a change in the inventory.

5.10 Safety NCOs will:

5.10.1 Monitor the clinic/section HAZCOM Program.

5.10.2 Maintain a current inventory of all hazardous chemicals and materials.

5.10.3 Maintain MSDS for all chemicals on the Hazardous Chemical Inventory (HCI).

5.10.4 Notify the IH, HM/HW Manager and Safety Officer of changes in procedures or operations.

5.10.5 Maintain and implement HAZCOM measures, as required, for their area, including training and the maintenance of the HAZCOM Program in the Safety SOP.

5.10.6 Provide an annual updated copy of the HCI to the Safety Officer or when revised.

5.11 Employees will:

5.11.1 Comply with all regulations, directives and SOPs applicable to HAZCOM training, and with MSDS.

5.11.2 Study and understand the MSDS within their workplace.

5.11.3 Notify supervisors/Safety NCOs and Chief, Materiel Branch if procured items or chemicals are received without MSDS or are not labeled.

5.11.4 Attend HAZCOM scheduled training classes and use PPE as required in the workplace.

5.11.5 Ensure site-specific training is conducted and documented in their six-sided folder.

5.12 Contractors/Contracting officer representatives (CORs) will:

5.12.1 Advise work area supervisors, the Safety Officer, and IH of non-MEDDAC procured hazardous chemicals and materials that the contractor will use and submit a copy of the chemical inventory to

the Safety Officer. A chemical inventory and MSDS will be kept at the job site where the contractor is performing work. Contractors will notify the above organizations of intended use of chemicals and gain their approval in writing prior to bringing them into any MEDDAC building.

5.12.2 Contractors will be notified at this time of any hazardous chemicals and/or materials that their employees may be exposed to while performing their work and suggestions for appropriate protective measures will be made. Contractors are required to validate in writing that appropriate PPE has been acquired, trained and is available for use for their personnel prior to employees using hazardous chemicals.

6. Non-Routine Tasks:

6.1 Exemptions. This memorandum does not apply to:

6.1.2 Tobacco or tobacco products.

6.1.3 Personal food, drugs and cosmetics

6.1.4 Consumer products that are used in the same manner as normal consumer use, and though this use results in a duration and frequency of exposure that is not greater than exposures experienced by consumers. For example:

6.1.4.1 An employee who occasionally changes copier toner, identified by the manufacturer as hazardous, is exempt from the standard. The worker who maintains the copier full time is not exempt from the standard, if the manufacturer has identified the toner as hazardous.

6.1.4.2 An office worker who uses an all-purpose cleaner, identified by the manufacturer as hazardous, to clean his or her desk, is exempt. However, housekeeping personnel using the same cleaner are not exempt from the standard.

6.2 Laboratories and the OSHA Hazardous Communication Standard (HCS). Laboratories and clinics shall comply with 29 CFR 1910.1450, to include development of a written chemical hygiene plan.

6.3 Labeling of hazardous chemical containers.

6.3.1 Labeling of hazardous chemical containers shall provide workers with baseline information on the substance(s) they are exposed to.

6.3.2 Manufacturers, importers, or distributors of hazardous chemicals or materials must label, tag or mark the containers with identity, warning, and the name, address, and phone

number of the manufacturer, importer, or other responsible party. If the original label on a container becomes unreadable it will be labeled using the label found at Appendix A.

6.3.3 In the workplace, each container into which a hazardous chemical or material is being transferred from a labeled container shall be labeled with the chemical name and show the appropriate hazard warnings (Appendix A) for employee protection. (29 CFR 1910.1220(f)(5))

6.3.4 Labels will be in English, legible and prominently affixed to the container.

6.3.5 When unlabeled materials are received they shall be returned to the vendor.

6.3.6 Portable containers. Employees are required to legibly label, in English, portable hazardous chemical containers.

6.3.7 Laboratory chemicals. Incoming laboratory chemicals will not have the labels detached. Containers such as test tubes, flasks and beakers that are in use need not be labeled unless required by an OSHA substance-specific standard.

6.3.8 Drugs. When in solid form and regulated by the Food and Drug Administration (tablets and pills) are exempt for direct administration to the patient.

6.3.9 Containers not meeting the exemptions.

6.4 MSDS.

6.4.1 The contents of all MSDS used within the MEDDAC/DENTAC/VS/VA shall meet OSHA standards.

6.4.2 No hazardous material will be used until the MSDS has been obtained and is placed in the required file.

6.4.3 If necessary, obtain MSDS in languages other than English for non-English speaking employees.

6.4.4 The MSDS shall correctly match the hazardous material to which it is being applied.

6.4.5 All personnel will have ready access to the MSDS applicable to their work areas. MSDS will be organized in alphabetical order, immediately after the Hazardous Chemical Inventory in the clinic/department/area's HAZCOM binder (normally yellow in color).

6.4.6 Employees who question the safe use of a chemical or material will not be required to use it until the hazards and protective procedures are explained.

6.4.7 Housekeeping MSDS will be kept in each janitorial closet. Master copies will be kept in the Housekeeping and Safety offices. Copies will be available to individual activities upon request to the Safety Office.

6.5 Identifying the existence of hazardous chemicals and materials.

6.5.1 Identification of hazardous chemicals and materials will take place primarily by reading the label on the product. If a warning is present (for example, flammable, corrosive or danger), the employee will review the applicable MSDS for health hazards and safety information.

6.6 Non-routine tasks. Non-routine tasks, (that is, spill clean up and other temporary duties), will be performed IAW site-specific training the employees receive. (See paragraph 7.2 below.)

6.7 The Hazardous Chemical Inventory (HCI)

6.7.1 It is the supervisor's responsibility to ensure that an HCI is maintained within his or her clinic/section.

6.7.2 The HCI will:

6.7.2.1 As a minimum, be updated annually and will include an inventory of all hazardous chemicals and materials maintained by the clinic/section. The HCI will also be updated whenever hazardous chemicals or materials are physically added or removed from the clinic/section's inventory. (Whenever possible, non-hazardous chemicals/materials will be substituted for hazardous chemicals/materials used within the clinic/section.)

6.7.2.2 Be completed IAW the standardized format provided by the MEDDAC Safety Office.

6.7.2.3 Cross-reference the clinic/section's MSDS file.

6.7.2.4 Be filed in the clinic/section's HAZCOM binder, immediately in front of the MSDS.

6.7.2.5 Be forwarded (annual HCI and updates) electronically to the MEDDAC Safety Office.

6.8 Chemical spill after action reports.

6.8.1 Following a chemical spill, the supervisor or other person in charge will submit a DA Form 4106 (Incident Report), as an after action report, to the MEDDAC Safety Officer and IH. Include the following information on the report:

6.8.1.1 Date of the incident

6.8.1.2 Location of spill

6.8.1.3 Substance

6.8.1.4 Volume

6.8.1.5 Appearance and/or odor

6.8.1.6 Number of individuals injured/exposed.

6.8.1.7 Other relevant information.

7. HAZCOM Training

7.1 Initial generic Hazard Communication Training will be accomplished and documented in APEQS.

7.2 Site-specific training. Supervisors will ensure their employees receive training in site-specific tasks that are performed within their clinic/sections, and that this training is thoroughly understood by the employees. Emergency response and chemical spill guidelines are laminated information cards, provided by the Security Officer, that are worn along with the facility identification badges. The MEDDAC Hazardous Materials and Hazardous Waste Plan contain the specific programs.

7.3 Employee information and training. Supervisors will ensure that training is given to their employees that is appropriate for their duties. Training will

include familiarization with all aspects of HAZCOM required by this regulation. Site-specific training is accomplished with the clinic/section. (See paragraph 7.2, above.) Minimally, during clinic/section level training, employees must be provided additional training on categories of hazards to which they are exposed (carcinogens, corrosives, highly toxic irritants, and toxic materials) and whenever new chemicals are introduced to the workplace.

The proponent for this Memorandum is the RWBAHC Safety Office. Users are invited to send comments and suggested improvements on DA Form 2028 directly to Commander U.S. Army MEDDAC, ATTN: MCXJ-DCA-SAF Fort Huachuca, Arizona 85613-7079

FOR THE COMMANDER:

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APPENDIX A

<p>CHEMICAL NAME</p> <hr/> <p>Chemical Manufacturer's / Importer Name</p> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>HEALTH HAZARD</p> <p>4 Deadly 3 Extreme danger 2 Hazardous 1 Slightly hazardous 0 Normal material</p> </div> <div style="width: 30%; text-align: center;"> <p>PHYSICAL HAZARDS</p> </div> <div style="width: 30%;"> <p>FIRE HAZARD</p> <p>Flash Points 4 Below 73° F 3 Below 100° F 2 Above 100° F, no exceeding 200° F 1 Above 200° F 0 Will not burn</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;"> <p>SPECIFIC HAZARD</p> <p>ACID-Acid ALK-Alkali COR-Corrosive OXO-Oxidizer P-Polymerization R-Radioactive W-Use No Water</p> </div> <div style="width: 30%;"> <p>REACTIVITY</p> <p>4 May detonate 3 Shock & heat may detonate 2 Violent chemical change 1 Unstable if heated 0 Stable</p> </div> </div> <p>ROUTE OF EXPOSURE</p> <table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/> INHALATION</td> <td><input type="checkbox"/> INGESTION</td> <td><input type="checkbox"/> ABSORPTION THROUGH SKIN</td> </tr> </table> <p>HEALTH HAZARDS</p> <table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/> NO HEALTH HAZARD</td> <td><input type="checkbox"/> TOXIC</td> <td><input type="checkbox"/> CORROSIVE</td> </tr> <tr> <td><input type="checkbox"/> CARCINOGEN</td> <td><input type="checkbox"/> IRRITANT</td> <td><input type="checkbox"/> HIGHLY TOXIC</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/> SENSITIZER</td> </tr> </table>	<input type="checkbox"/> INHALATION	<input type="checkbox"/> INGESTION	<input type="checkbox"/> ABSORPTION THROUGH SKIN	<input type="checkbox"/> NO HEALTH HAZARD	<input type="checkbox"/> TOXIC	<input type="checkbox"/> CORROSIVE	<input type="checkbox"/> CARCINOGEN	<input type="checkbox"/> IRRITANT	<input type="checkbox"/> HIGHLY TOXIC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SENSITIZER	<p>Address</p> <hr/> <p>Emergency Phone</p> <hr/> <p>(✓ Mark Appropriate Protection Required)</p> <p style="text-align: center;">PERSONAL PROTECTION</p> <table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/> Safety Glasses</td> <td><input type="checkbox"/> Apron</td> <td><input type="checkbox"/> Respirator</td> </tr> <tr> <td><input type="checkbox"/> Face Shield</td> <td><input type="checkbox"/> Boots</td> <td><input type="checkbox"/> Self Contained Air Respirator</td> </tr> <tr> <td><input type="checkbox"/> Gloves</td> <td><input type="checkbox"/> Splash Goggles</td> <td><input type="checkbox"/> Full Protection Suit</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>OTHER</td> <td>OTHER</td> <td>OTHER</td> </tr> </table> <p>TARGET ORGANS</p> <table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/> SKIN</td> <td><input type="checkbox"/> LUNGS</td> <td><input type="checkbox"/> CARDIOVASCULAR SYSTEM</td> </tr> <tr> <td><input type="checkbox"/> EYES</td> <td><input type="checkbox"/> KIDNEYS</td> <td><input type="checkbox"/> CENTRAL NERVOUS SYSTEM</td> </tr> <tr> <td><input type="checkbox"/> BLOOD</td> <td><input type="checkbox"/> LIVER</td> <td><input type="checkbox"/> AUTONOMIC NERVOUS SYSTEM</td> </tr> <tr> <td><input type="checkbox"/> HEART</td> <td><input type="checkbox"/> RESPIRATORY SYSTEM</td> <td><input type="checkbox"/> REPRODUCTIVE SYSTEM</td> </tr> </table>	<input type="checkbox"/> Safety Glasses	<input type="checkbox"/> Apron	<input type="checkbox"/> Respirator	<input type="checkbox"/> Face Shield	<input type="checkbox"/> Boots	<input type="checkbox"/> Self Contained Air Respirator	<input type="checkbox"/> Gloves	<input type="checkbox"/> Splash Goggles	<input type="checkbox"/> Full Protection Suit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OTHER	OTHER	OTHER	<input type="checkbox"/> SKIN	<input type="checkbox"/> LUNGS	<input type="checkbox"/> CARDIOVASCULAR SYSTEM	<input type="checkbox"/> EYES	<input type="checkbox"/> KIDNEYS	<input type="checkbox"/> CENTRAL NERVOUS SYSTEM	<input type="checkbox"/> BLOOD	<input type="checkbox"/> LIVER	<input type="checkbox"/> AUTONOMIC NERVOUS SYSTEM	<input type="checkbox"/> HEART	<input type="checkbox"/> RESPIRATORY SYSTEM	<input type="checkbox"/> REPRODUCTIVE SYSTEM
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