

**NOVEMBER 2009 LOSS PREVENTION NEWSLETTER**  
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**YOUR HAZCOM CURRENT COMPLIANCE STATUS**

In the October Newsletter, we noted the intention to continue a review of your state of readiness for an OSHA Compliance review of your operations. Although, as noted above, HAZCOM may be a much different document in 2010, we will review the status that you should be maintaining currently.

- Do you have a current list of chemicals and chemical compounds in use at the property?
- Have you determined the maximum quantity that may be safely stored?
- Do you have data on toxicity, flammability, and other health hazards for all chemical products in use?
- Do you have approved flammable products storage units?
- Have you determined limits of exposure? How long may an employee use a product in a given work period? Is there a cumulative effect from continued exposure? If so, is there protective equipment which will permit unlimited product use by an employee?
- Is proper protective equipment available? Where face masks are required, are they correctly fitted and properly maintained, and are employees trained in their use? With the cost of a full oxygen mask in excess of \$1,000, such equipment should be under full control as to storage, maintenance, and use.
- Do you have a Material Safety Data Sheet (MSDS) for every listed chemical or chemical compound in use?
- Is there an MSDS file for all chemicals used by a department? Is it available 24/7 to all employees?
- Is an employee and alternate designated to maintain a master file of ALL MSDS copies covering all departments? Is a copy of the master also maintained at the front desk for information for first responders in an emergency?
- Does the master file include a section of discontinued chemicals or chemical compounds? Employee exposure to chemicals could become the basis for action against the employer under workers' compensation or other sections of OSHA. Possession of the old records would be invaluable in adjudicating such claims.
- Do you have a current written hazard communication program?
- Is this information shared with the employees handling the hazardous materials?
- Does the program include information as to the individuals responsible for the hazardous chemical list, the MSDS files, the label program and training?
- Do you have a labels coordinator?
- Have you worked with the manufacturer or supplier to provide label information that can be easily understood by the employee? Much of the data is highly technical and would be meaningless to the employee, if not "translated."

- Does the label identify the material in the contained? Does it provide the manufacturer's name, address, phone number and special emergency phone number (if available)? Are appropriate hazard warnings provided?
- Is the label in English? It is recommended it be in both English and a language familiar to most of the foreign language staff members
- Has the labels coordinator ensured the label is not in conflict with requirements of the Department of Transportation, Environmental Protection Agency or Consumer Products Safety Commission?.
- When drawing a chemical or chemical compound from bulk ( iFor example:. 55 gallon drum ), a label must be provided on the spray bottle or other container. An exception is permitted to labeling if the amount being drawn is for he work shift, only. Your editor advises the use of labels; because there will be the instances where the quantity drawn is more than needed and the unlabelled container is put on the linen room shelf. Soon you have a series of containers where one has no idea as to the contents.
- Is your HAZCOM Training Program current? Have you named the trainer(s) and are you maintaining a training schedule for new employees and an annual review for all employees involved with HAZCOM? Are special training sessions provided when a new chemical or chemical compound is added to materials currently used on the property?
- Where will the training be provided? Is it a dedicated space for training purposes?
- Does training content include Physical and Health Hazards with focus on chemical groups and specific chemicals in use?
- Is there a section on methods and observations for detection of release of hazardous chemicals?
  - By visual appearance.
  - By odor.
  - By chemical monitoring methods.
  - By identifying locations on premise where chemicals are used and released
- Protocol for work practices; emergency procedures; personal protective equipment and engineering controls.
- Explanation to employees on labeling and reading of instructions before using the chemical or chemical compound. How to obtain MSDS and how to use MSDS.
- Are records carefully kept confirming:
  - Who was trained and when?
  - Where the MSDS files are located and how to use them.
  - Maintenance and implementation of the labeling program and use of personal protective equipment as included in both the MSDS and label.

In the December 2009 Newsletter, the critical protocol for BLOODBORNE PATHOGENS will be presented.