



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Oregon State Office  
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Portland, Oregon 97208



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To: DSDs, Staff and Branch Chiefs  
From: Associate Deputy State Director for Management Services  
Subject: Oregon/Washington Hazard Communication Plan - Annual Compliance Requirements DD:04/17/2006

The Oregon State Office Hazard Communication Plan is a supplement (Release 1-325) to the Bureau of Land Management (BLM) Safety and Health Management Handbook 1112-1. The plan contains all required elements to ensure full compliance with the current Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (Employee Right to Know) 29CFR 1910.1200.

The Hazard Communication Plan is managed in coordination with the Environmental Protection Specialist (Hazardous Materials Management Coordinator) for the State Office who is responsible for waste minimization, spills or releases, and disposal efforts.

Individual supervisors are directly responsible for the safety and health of their employees and play an important role in ensuring that each employee receives appropriate safety training. The following highlights annual requirements and due dates for the Hazard Communication Plan.

- Each branch/staff chief retains responsibility for completion and/or update of the required *Annual Chemical Inventory* for their area.
- Inventories are completed using Form OR 1112-20, located on the OR/WA Intranet at the following website: <http://web.or.blm.gov/safety/HAZCOM-NEW-JAN04/OR-1112-20-HAZCOM-INVENTORY-FINAL%20FORM-01-04.doc>

The instructions for completing the form may be reviewed at <http://web.or.blm.gov/safety/FORMS/OR-1112-20%20HAzard%20Mat%20Inventory%20Instructions.pdf>. A copy of the form is also attached to this Information Bulletin.

- Each chemical or product listed on the inventory must have an accompanying material safety data sheet (MSDS) if available. This form should be placed near the area where the chemical is used or stored to provide a ready reference for employees. A notebook of all MSDS documents should be kept in each branch.
- Copies of current inventories are to be submitted to the State Office Safety and Occupational Health Program Manager by April 17 2006. As the State Office has had a Hazard Communication Program in place for several years, each branch should already have a current inventory which may only need to be reviewed and/or updated.
- Supervisors are responsible to review the OR/WA Hazard Communication Plan with employees as well as the chemical inventory and accompanying MSDS forms for their area. Physical and health hazards which may be associated with any potential exposure should be discussed.

It is important to remember that MSDS forms are considered to be part of the employee permanent medical records and should not be discarded. (OSHA requires that any MSDS accompanying a chemical/product which is physically present in the workplace be kept by the employing agency.) Outdated MSDS forms may be archived by routing them to the State Office Safety Manager accompanied by the following information:

- Location where product used and approximately time frame of use (e.g., 4<sup>th</sup> floor, Engineering OR 959; January 2000 – August 2005)
- Branch Chief/Supervisor signature

Some examples of products commonly used by employees in the state office that *may* contain various chemical compounds include solvent cleaners, some toners for copying machines, anti-static sprays, whiteboard markers, highlighters, correction fluid, computer keyboard spray cleaners, and most desk and glass cleaners. Many of these products are not always shipped with an accompanying MSDS from the manufacturer. (Reference websites for MSDS forms are listed in the Hazard Communication Plan on page I-4.) Regardless, each product should be listed on the required Annual Inventory. Once an initial inventory is created, only yearly updates are necessary. For convenience, original MSDS forms for most common office supplies are located in the BLM supply room on P2. Copies may be made of any of the forms.

Branch/staff chiefs may designate an employee on their behalf to manage chemical/product inventories and material safety data sheets and to ensure that the annual inventory is accomplished. In general, annual inventory reports are very similar and contain significant changes *only* when a chemical-containing compound is eliminated from use, or, a new product is purchased. Additional guidelines for compliance are included in the Oregon/Washington Hazard Communication Plan which can be referenced at the following website:

<http://web.or.blm.gov/safety/ORWA%20MANUAL%20SUPPS/HAZCOM%20PROGRAM.pdf>

To assist in training efforts, a PowerPoint® presentation is available on the BLM Intranet Safety Web Page at the following website: <http://web.or.blm.gov/safety/training/training.htm>. This site also contains training notes, a short informal quiz, and a certificate of training completion.

It is important that supervisors briefly review the Hazard Communication Plan with employees who now use or may use any products in the work environment which contain any type of hazardous chemicals.

Any questions regarding the plan and inventory requirements or the web resource materials may be addressed to Peggy Tribble, State Office Safety and Occupational Health Manager at extension X6202.

**Districts with Unions** are reminded to notify their unions of this Information Bulletin and satisfy any bargaining obligations before implementation. Your servicing Human Resources Office or Labor Relations Specialist can provide you assistance in this matter.

Signed by  
Debbie Henderson-Norton  
Acting Associate Deputy State Director

Authenticated by  
Mary O'Leary  
Management Assistant

1 Attachment(s)

1 - [Annual Chemical \(Hazardous Materials\) Inventory Sheet](#) (1p)

Distribution

WO-740 (MIB, Rm. 2004)

**U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ANNUAL CHEMICAL (Hazardous Materials) INVENTORY SHEET**

Page # \_\_\_\_\_ 1  
Inventory Completed By \_\_\_\_\_

State \_\_\_\_\_

District/SO/Branch \_\_\_\_\_

Building Name \_\_\_\_\_

Work Area \_\_\_\_\_

DATE  
\_\_\_\_\_

Company Name/ Address - Phone	Product Name	Product Number	Form* Number	Cont. Size	No. of Cont. On Hand	National Stock Number NSN	User(s)	Remarks	MSDS on Hand (Yes/No)

\*Form = 1 LIQUID, 2 AEROSOL, 3 SOLID, 4 GEL, 5 PASTE, 6 POWDER, 7 GAS