

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
Oregon State Office  
P.O. Box 2965  
Portland, OR 97208**

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January 23, 2004

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Information Bulletin No. OR-2004-061

To: DMs, DSDs, Staff and Branch Chiefs

From: Associate Deputy State Director for Management Services

Subject: Oregon/Washington Hazard Communication Plan Annual Compliance Requirements DD: 04/05/2004

The Oregon State Office Hazard Communication (HazCom) Plan was revised last year to ensure compliance with the current Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (Employee Right to Know) 29 CFR 1910.1200. The plan can be accessed at the following website:

<http://web.or.blm.gov/safety/HAZARD%20COMMUNICATION%20PROGRAM%20-%20September%2003%20Update.pdf>

The HazCom Plan is managed in coordination with the Hazardous Materials (HazMat) 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 compliance requirements of the HazCom Plan.

- Each branch/staff chief is responsible for the completion of the required Annual Chemical (HazMat) Inventory for their areas.
- Inventories are compiled using Form OR-1112-20, which can be found on the Oregon/Washington (OR/WA) Intranet at the following website: <http://web.or.blm.gov/safety/FORMS/HAZMAT%20INVENTORY.pdf>. This form is also attached.
- 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

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is used to provide a ready reference for employees. A notebook of all MSDS documents should be kept in each area.

- Copies of current inventories are to be submitted to the Oregon State Office (OSO) Safety and Occupational

Health Manager by April 5 2004.

- Supervisors are responsible to review the HazCom plan with employees at least yearly and also review 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 that supervisor review the HazCom plan with employees who now use OR may use any products in the work environment which contain any type of hazardous chemical.

To assist supervisors in their training efforts, a Power Point presentation is available on the Bureau of Land Management (BLM) Intranet Safety Web Page at <http://web.or.blm.gov/safety/training/training.htm>. This site also contains training notes, a short informal quiz (with answers), and a certificate of training completion.

OSHA requires all employers to implement a system which accurately identifies all chemical products used by employees, as well as the dates of use. This “record of use” may be accomplished by indicating employee names and use dates on the existing Annual Chemical Inventory in each branch. Individual copies of this record should be permanently maintained by the supervisor in each employee file.

Some examples of products commonly used by employees in the state office that *may* contain chemical compounds include solvent-based cleaners, various toner products for copying machines, printer ribbons, anti-static sprays, correction fluid and glass cleaners. Many of these products are not always shipped with an accompanying MSDS form from the manufacturer. Regardless, each product should be listed on the required Annual Inventory for each branch. Once an initial inventory is created, only yearly updates are required. As the State Office has had a Hazard Communication Plan in place since FY 2000, each branch should already have an initial inventory created. Additions to the inventory should be few if any.

Branch/staff chiefs may designate an employee on their behalf to manage chemical inventories and materials 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 OR/WA Hazard Communication Plan.

Any questions regarding the plan, the inventory requirements or the web resource materials may be addressed to Peggy Tribble, OSO Safety and Occupational Health Manager at extension 6202.

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**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  
John K. Keith  
Associate Deputy State Director  
For Management Services

Authenticated by  
Mary O'Leary  
Management Assistant

1 Attachment(s)  
1 - [Annual Chemical \(HazMat\) Inventory Sheet](#) (1p)

Distribution  
WO-740

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

Page # \_\_\_\_\_

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