



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Oregon State Office  
P.O. Box 2965  
Portland, Oregon 97208



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To: DSDs, Staff and Branch Chiefs

From: Associate Deputy State Director for Management Services

Subject: Oregon/Washington (OR/WA) Hazard Communication Program - Annual Compliance Requirements DD: 05/01/2007

A revision to the *Oregon/Washington (OR/WA) Hazard Communication Program* has recently been published as a [new supplement](#) (Release 1-339) to the Bureau of Land Management (BLM) Safety and Health Management Handbook 1112-1. The program contains all required elements to ensure full compliance with the current Occupational Safety and Health Administration (OSHA) Hazard Communication Standard also known as the *Employee Right to Know Program* - 29CFR 1910.1200.

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

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

- Each Branch Chief/Supervisor is responsible for completion and/or updating of the required Annual Chemical (Hazardous Materials) Inventory for their area.
- Inventories are completed using Form OR 1112-20 which can be found on the [OR/WA Safety Intranet](#) under *Resources and Forms*. [Instructions](#) for completing the form are also available on the site. A blank copy of the form is attached to this Information Bulletin (IB), as well as an example of a completed inventory.

- 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 Safety Office by *May 1, 2007*. As the State Office has had annual compliance requirements in place for several years, each branch should already have a completed inventory which may only need to be reviewed and updated.
- Branch Chiefs/Supervisors are responsible to review the *OR/WA Hazard Communication Program* 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.

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 for products no longer in use may be archived by routing to the State Safety Office accompanied by the following information:

- Location where the product was used and approximate time frame of use (e.g., *2<sup>nd</sup> floor, Engineering OR 959; January 2000 – August 2006*)
- 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 types of toners used in copy and fax machines, anti-static sprays, whiteboard markers, highlighters, and computer keyboard spray cleaners, as well as most desk and glass cleaners.

Consumer products such as household detergents, cleansers, and typing correction fluid do not have to be listed in the inventory. These types of products are considered *exempt* as they are chemical products that are normally found in a home or office environment and intended for use according to the printed directions of the manufacturer. When use is limited as intended, these products create very low-level exposures no greater than the manufacturer expects of the general public. Additionally, most of these products are usually purchased in normal consumer quantities rather than bulk.

Each chemical or product listed on the inventory must have an accompanying MSDS. However, many products may be shipped without this form. Manufacturers' websites generally provide links to current MSDS forms for their products. The [University of Vermont](#) and [Cornell University](#) both have web sites where MSDS forms can be obtained if the product manufacturer cannot provide same. Additional web sites listing MSDS information can be found on the BLM safety intranet site under [Resources](#).

Branch Chiefs/Supervisors may designate an employee on their behalf to prepare and update the annual chemical inventory sheet and obtain the material safety data sheets to ensure annual

accomplishment. 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 recently revised *Oregon/Washington (OR/WA) Hazard Communication Program* which can be referenced on the [BLM Safety Intranet](#) website.

To assist in training efforts, a PowerPoint® presentation is available on the Safety website under [Training](#). This site also contains training notes, a short informal quiz, and a certificate of training completion. Additional training resources available include a Digital Versatile Disk (DVD) titled *Hazard Communication for Non-Industrial Employees* (the office environment) which is available through the State Safety Office, and a one-hour *Hazard Communication Course* on-line at [DOI Learn](#). This training is based the OSHA Hazard Communication Standard (29 Code of Federal Regulations (CFR) 1910.1200).

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

Any questions regarding the plan and inventory requirements or the training resource materials may be addressed to the State Safety Office at (503) 808-6202 or (503) 808-6249.

**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  
Rita Wallberg  
Records Section

#### 2 Attachments

- 1 - [Annual Chemical \(Hazardous Materials\) Inventory Sheet](#) (1 p)
- 2 - [Hazardous Materials Inventory – Example](#) (2 pp)

#### Distribution

WO-740 (Sandy Guches, MIB 2044)