



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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To: DSDs, Staff and Branch Chiefs

From: Deputy State Director for Management Services

Subject: Oregon/Washington (OR/WA) Hazard Communication
Program Annual Compliance Requirements for the State
Office

DD: 05/01/2008

The *Oregon/Washington Hazard Communication Program* has been published as a handbook supplement (Release 1-339) to the Bureau of Land Management (BLM) Safety and Health Management Handbook 1112-1. The program contains all the 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 Oregon/Washington 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 and 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 items highlight the annual reporting requirements for the *Oregon/Washington Hazard Communication Program*.

- Each Branch Chief /Program Manager is responsible for initial completion and update of the required Annual Chemical (Hazardous Materials) Inventory for their area(s).

- Inventories are to be completed using Form OR 1112-20 which can be found on the [OR/WA Safety Intranet](#) Web site under *Resources and Forms*. Instructions for completing the form are also available on the Web site. A blank copy of the form is attached to this Information Bulletin, 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). This form is 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 01, 2008**. Since the State Safety 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 yearly.
- Branch Chiefs/Program Managers are responsible to review, at least annually, the *OR/WA Hazard Communication Program*, as well as the chemical inventory and accompanying MSDS forms for their area, with employees. Physical and health hazards which may be associated with any potential exposure should be discussed. For convenience, original MSDS forms for most common office supplies are located in the OR/WA supply room on floor P2. Copies may be made of any of the MSDS forms.

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, computer keyboard spray cleaners, as well as most desk and glass cleaners. The State Office has recently replaced all desk and whiteboard cleaners with soy-based products. By continuing to focus on the procurement of environmentally preferable “green” products, the workload associated with completing the required annual chemical inventory will be significantly reduced.

Consumer products such as household detergents and cleansers 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.

As noted above, each chemical or product listed on branch inventories must have an accompanying MSDS. However, some products may be shipped without this form. Manufacturers’ Web sites generally provide links to current MSDS forms for their products. Additional Web sites listing MSDS information can be found on the OR/WA Safety intranet site under [Resources](#).

Branch Chiefs/Program Managers may designate an employee on their behalf to prepare and update the annual chemical inventory sheet and obtain the MSDS 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.

To assist in annual employee training efforts, a PowerPoint® presentation is available on the OR/WA Safety intranet Web site under [Training](#). This site also contains training notes, a short informal quiz, and a certificate of training completion. Additional training resources include a 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* online at [DOI Learn](#). This training is based the OSHA Hazard Communication Standard (29 CFR 1910.1200).

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

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

Signed by
Victoria N. Gillam
Acting Deputy State Director
for Management Services

Authenticated by
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Records Section

2 Attachments

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

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