

# SYSTEMWIDE POLICY

## Hazard Communication Program

**This Policy is Applicable to the following Corewell Health sites:**

**SYSTEMWIDE**

Beaumont Pharmacy Solutions, Beaumont Post Acute Care, Continuing Care (CHW), Corewell Health Beaumont Grosse Pointe Hospital, Corewell Health Beaumont Troy Hospital, Corewell Health Big Rapids Hospital, Corewell Health Dearborn Hospital, Corewell Health Farmington Hills Hospital, Corewell Health Gerber Hospital, Corewell Health Grand Rapids Hospitals (Blodgett Hospital, Butterworth Hospital, Helen DeVos Children's Hospital), Corewell Health Greenville Hospital, Corewell Health Ludington Hospital, Corewell Health Medical Group East, Corewell Health Medical Group West, Corewell Health Pennock Hospital, Corewell Health Reed City Hospital, Corewell Health South (Niles, St. Joseph, and Watervliet Hospitals; Corewell Health Medical Group South; Applicable Corewell Health South Regional Sites), Corewell Health Taylor Hospital, Corewell Health Trenton Hospital, Corewell Health Wayne Hospital, Corewell Health William Beaumont University Hospital (Royal Oak), Corewell Health Zeeland Hospital, Corporate (Corewell Health East), Corporate (Corewell Health West, South and Priority Health), Outpatient/Physician Practices (CHW), Priority Health

<b>Applicability Limited to:</b>	N/A
<b>Reference #:</b>	29128
<b>Version#:</b>	2
<b>Effective Date:</b>	12/23/2024
<b>Functional Area:</b>	Corporate Safety
<b>Department Area:</b>	Corporate Safety

### 1. Purpose

The Hazard Communication Program is intended to protect team members by establishing guidelines for communicating information on the hazards posed by the hazardous chemicals in the work environment. This pertains to any hazardous material which is known to be present in the workplace in such a manner that team members may be exposed under normal conditions of use or in a foreseeable emergency. The following program is written to comply with Federal OSHA 29 CFR 1910.1200 Hazard Communication and MIOSHA Act 154, Part 42, 92 and 430 Hazard Communication.

The Hazard Communication Standard (also referred to as "HCS," "HazCom," "Right To Know Law," "RTK") promulgated by OSHA and adopted by MIOSHA, aligns with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS), which is an internationally standardized system that includes criteria for the classification of health, physical, and environmental hazards, as well as specifying what information should be included on labels and safety data sheets (SDSs).

In Michigan, the Right to Know Law package, integrated with the HCS, is three-fold and includes:

1. **Michigan's Right to Know Law** - provides access to chemical information for workers whose jobs involve the routine use of hazardous chemicals.

2. **Michigan's Firefighter Right to Know Law** - provides the fire chief of the organized fire department for the jurisdiction in which the person is located the right to request and receive a list of chemicals and Safety Data Sheets (SDS) used at a specified location.
3. **Michigan's Community Right to Know Law** – provides for any resident of an employer's county to request a listing of an SDS for all hazardous chemicals present at that employer's workplace.

Laboratory workers are also covered under the Chemical Hygiene Plan(s) in accordance with the Hazardous Work in Laboratories Standard (MIOSHA Part 431) and may have additional Hazard Communication guidelines.

## 2. Definitions

- 2.1. **Container** – Bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.
- 2.2. **Chemical** – Any element, chemical compound, or mixture of elements and/or compounds.
- 2.3. **Chemical Inventory** – A list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate SDS.
- 2.4. **Environmental Hazard** – Material classified as posing hazards that affect biomes or ecosystems (e.g., acute or chronic aquatic toxicity).
- 2.5. **Globally Harmonized System of Classification and Labeling of Chemicals (GHS)** – Internationally standardized system that includes criteria for the classification of health, physical, and environmental hazards, as well as specifying what information should be included on labels and SDSs.
- 2.6. **Hazard Category** – Division of criteria within each hazard class (e.g., Category 1 represents the most severe hazard within each hazard class).
- 2.7. **Hazard Class** – The nature of the physical, health, or environmental hazard (e.g., flammable solid, carcinogen, oral acute toxicity).
- 2.8. **Hazard Not Otherwise Classified (HNOG)** – Material that poses adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes.
- 2.9. **Hazard Statement** – Statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. (e.g., fatal if inhaled or swallowed)
- 2.10. **Hazardous Chemical** – Any chemical which is classified as a physical hazard, health hazard, environmental hazard, or hazard not otherwise classified.
- 2.11. **Hazardous Material Information System (HMIS)** – Numerical hazard rating that incorporates the use of labels with use of color bars, numbers, letters, symbols; developed by the American Coatings Association as a compliance aid for HCS.
- 2.12. **Health Hazard** – Material classified as posing hazards that affect human health. (e.g., acute toxicity; skin corrosion or irritation; eye corrosion or irritation; respiratory or skin sensitization;

Entities will reference associated Documentation contained within this document as applicable  
Printouts of this document may be out of date and should be considered uncontrolled.

germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity, corrosive to respiratory tract, aspiration hazard).

- 2.13. **Label** – An appropriate group of written, printed, or graphic information elements concerning a hazardous product. Selected as relevant to the target sector(s), which is affixed to, printed on, or attached to the immediate container of a hazardous product (or to the outside packaging of a hazardous product).
- 2.14. **Michigan Occupational Health and Safety Administration (MIOSHA)** – State government agency that regulates workplace safety and health in Michigan; Michigan State Plan approved by federal OSHA.
- 2.15. **Multi-Employer Worksites** – A worksite where employers who produce, use, or store hazardous chemicals at a workplace in such a way that the workers of other employer(s) may be exposed.
- 2.16. **National Fire Protection Agency (NFPA) 704 Hazard Rating** – System of markings, commonly referred to as “NFPA Hazard Diamond”, that provides immediate general sense of hazards of a material and severity of the hazards as they relate to emergency response.
- 2.17. **Occupational Health and Safety Administration (OSHA)** – Federal regulatory agency of the United States Department of Labor that is committed to safeguarding worker health and safety by developing and enforcing health and safety standards.
- 2.18. **Pictogram** – Symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms (hazard icons in red diamonds) are designated under HCS for application to a hazard category.
- 2.19. **Physical Hazard** – Material classified as posing hazards that affect physical safety (e.g., explosives, flammable materials, oxidizers, self-reactive materials, pyrophoric materials; self-heating materials, materials corrosive to metal, aerosols or chemicals under pressure, materials that emit flammable gas when in contact with water).
- 2.20. **Precautionary Statements** – A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage and handling (e.g., “Wear respiratory protection”, “Wash with soap and water”, “Store in a well-ventilated place”).
- 2.21. **Product Identifier** – Name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical.
- 2.22. **Safety Data Sheet (SDS)** – formally known as Material Safety Data Sheet (MSDS); written or printed document concerning a hazardous chemical.
- 2.23. **Secondary Container** - Portable, secondary, or in-house workplace containers other than the initial container that the hazardous chemical came in.
- 2.24. **Signal Word** – Words used to indicate the severity of the hazard and alert employees to the potential hazard (e.g., “Danger” [more severe hazard] or “Warning” [less severe hazard]).

### **3. Responsibilities**

#### **3.1. Corporate Safety**

- 3.1.1. Support compliance with this policy and applicable regulations.
- 3.1.2. Maintain and update this policy, as needed.
- 3.1.3. Provide recommendations to departments related to Hazard Communication.

#### **3.2. Department Leaders**

- 3.2.1. Ensure team members are trained on the specific hazards in their work area.
- 3.2.2. Maintain updated chemical inventories for their area in an accessible location. (i.e., electronic or paper copy)
- 3.2.3. Periodically verify that there are corresponding SDSs for products used in the department on the SDS Vault. (eBinder in MSDSonline)
- 3.2.4. Ensure the hazards posed by hazardous chemicals in their work area are properly communicated via signage, labeling, etc.
- 3.2.5. Seek approval for new potentially hazardous chemicals prior to procurement

#### **3.3. Project Managers**

- 3.3.1. Communicate hazards related to construction or similar projects to contractor and team members, as appropriate.

#### **3.4. Team Members (including Contractors)**

- 3.4.1. Comply with applicable Hazard Communication regulations, policies, and procedures

### **4. Policy**

#### **4.1. Hazard Classification**

- 4.1.1. Corewell Health relies on Safety Data Sheets (SDSs) from manufacturers and/or suppliers to provide appropriate hazard determinations/classifications, precautions for safe handling, storage requirements, appropriate disposal, first aid procedures, and any other necessary hazard information on respective SDSs, in accordance with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals, for the hazardous chemicals used or stored onsite.
- 4.1.2. GHS Hazard Identifiers
  - 4.1.2.1. Hazard Classes & Categories
  - 4.1.2.2. Hazard Statements & Precautionary Statements
  - 4.1.2.3. Pictograms

#### 4.1.2.4. Signal Words

### 4.2. Safety Data Sheets (SDSs)

4.2.1. SDSs are required for all substances in the workplace that are considered hazardous.

- 4.2.1.1. Exceptions: Food, Cosmetics, Drugs (when in final form for use), Tobacco Products, Wood Products that are not being processed, Radiation, Biological Hazards, Hazardous Waste, Consumer Products where the duration and frequency is the same as experienced by consumers (e.g., Office supplies used in the same manner and duration as at home).

#### 4.2.2. SDS Sections

Section 1. Identification  
Section 2. Hazard(s) identification  
Section 3. Composition/information on ingredients  
Section 4. First-aid measures  
Section 5. Firefighting measures  
Section 6. Accidental release measures  
Section 7. Handling and storage  
Section 8. Exposure controls/personal protection  
Section 9. Physical and chemical properties  
Section 10. Stability and reactivity  
Section 11. Toxicological information  
Section 12. Ecological information  
Section 13. Disposal considerations  
Section 14. Transport information  
Section 15. Regulatory information  
Section 16. Other information, including date of preparation or last revision

#### 4.2.3. SDS Access

- 4.2.3.1. SDSs for Corewell Health are stored in electronic “eBinders” through MSDSonline. The eBinders (commonly referred to as “SDS Vaults”) can be accessed by all staff 24/7 via The Well > Tools and Resources > SDS Vault.
- 4.2.3.2. Alternative Access (in the event of intranet/internet failure)
- 4.2.3.2.1. For intranet failure: contact 1-HELP at (616) 391-4357 and select option 3 for access to SDSs or use downtime links in knowledge article [KB0045894](#).
- 4.2.3.2.2. For any intranet/internet failure: contact MSDSonline at (888) 362-7416 (available 24/7) and provide the following for the SDS to be faxed back:

1. Product Name
2. Manufacturer
3. Your Fax Number
4. Product Code (optional)

- 4.2.4. New hazardous chemicals are required to have a copy of their SDS uploaded to Corewell Health's eBinder/SDS Vault either directly in MSDSonline or emailing the SDS to [hazardcommunication@corewellhealth.org](mailto:hazardcommunication@corewellhealth.org).

### 4.3. Chemical Inventory

- 4.3.1. The SDS Vault, or eBinder in MSDSonline, serves as the master chemical inventory for Corewell Health.

- 4.3.1.1. The SDS Vault is maintained by the SDS Vault Administrator(s).

- 4.3.2. Departments that use or store chemicals maintain a facility-specific chemical inventory that is accessible to team members, surveyors, etc. [See Chemical Inventory Template](#).

- 4.3.2.1. Chemical Inventory forms include at least the following (or equivalent information):

1. Location/Department Information
2. Date of Inventory/Date of Last Update
3. Department Contact Information
4. Product Name/Manufacturer
5. Storage Location(s)
6. Approximate Quantity

- 4.3.2.2. Chemical inventories should be reviewed and updated at least annually, or sooner if there are significant changes (e.g., significant change in quantity, new chemicals, discontinued use of chemicals, etc.)

- 4.3.2.3. A corresponding SDS for each product on a chemical inventory should be stored in the SDS Vault.

### 4.4. Posting Requirements

- 4.4.1. [MIOSHA Right To Know Poster](#) – designed to serve as a reminder to team members of their rights under the Michigan Right to Know Law and to provide information on how to locate SDSs.

- 4.4.1.1. Posted permanently in an accessible location for team members to review.

- 4.4.2. [MIOSHA New or Revised SDS Poster](#) – informs team members of any changes recently made to one or more SDSs

- 4.4.2.1. Post in an accessible location for team members within five (5) working days of receipt of new or revised SDS(s) and keep posted for a minimum of ten (10) working days.

## 4.5. Container Labeling

4.5.1. Labeling systems such as the Global Harmonized System (GHS), the National Fire Protection Association (NFPA) 704 Hazard Rating, and the Hazardous Materials Information System (HMIS) are permitted for workplace containers.

4.5.1.1. Labels with GHS hazard classification is the default system.

4.5.1.2. Alternative label information must be consistent with the Hazard Communication Standard (e.g., no conflicting hazard warnings or pictograms).

4.5.2. Labels must include:

1. Product identifier
2. Signal word
3. Hazard statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

4.5.3. Containers for hazardous chemicals received by Corewell Health from a supplier are checked for proper labels by the receiving department (e.g., Materials Management, Supply Chain, etc.). Missing or illegible labels are not accepted.

4.5.4. Condition of container labels for products in storage or in use are evaluated periodically. Defaced or missing labels are reported to the department supervisor.

4.5.5. Secondary container labels

4.5.5.1. Portable, secondary, or in-house workplace containers should include a label with either:

4.5.5.1.1. The same information that was on the original/shipped container, or

4.5.5.1.2. Product identifier and words, pictures, symbols or combination thereof, which provided at least general information regarding the physical and health hazards of the product

4.5.5.2. Exception: portable containers do not require labeling when hazardous chemicals are transferred from labeled containers and are intended only for the immediate use of the team member who performs the transfer (e.g., drugs which are dispensed by a pharmacy to a health care provider for direct administration to a patient are exempted from labeling.)

#### 4.6. Pipe Labeling

- 4.6.1 Pipes and piping systems that contain hazardous chemicals are identified by a label, sign placard, or written operating procedures.

Pipe System	Potential Hazard	Protective Equipment	Hazard Type	Comments
Sanitary Sewer	Biological contamination	Skin and eye protection	Biological	Wash skin if contacted, decon with bleach
Hot Water Supply/Return	Thermal burns	Skin and eye protection	Physical Haz	
Natural Gas	Explosion and asphyxiation	Eye protection Fire extinguisher	Flammable gas	Prevent sparks, may fill confined space, ventilate
Compressed Air	Particulate impact damage	Eye protection	Physical Haz	Do not use to clean clothing
Steam and Steam Condensate	Thermal burns	Skin and eye protection	Physical Haz	
High Pressure Steam	Thermal burns	Skin and eye protection	Physical Haz	
Oxygen	Fire, hyperoxia	Fire extinguisher	Oxidizer (accelerates flammability)	High concentrations may cause fire, ventilate

- 4.6.2. Corewell Health East color-coding system is identified in the Design/Construction Guidelines and Standards (Mechanical Piping Identification) developed and maintained by Facilities Management.

#### 4.7. Information and Training

- 4.7.1. Hazard Communication training is provided to new hires prior to initial work assignment and annually thereafter as part of Annual Compliance Education, which includes the following:
- 4.7.1.1. The requirements of the MIOSHA Hazard Communication Standard
  - 4.7.1.2. Location and availability of the written Hazard Communication Program, the list of hazardous chemicals, and their SDSs.
  - 4.7.1.3. Details of the Hazard Communication Program (e.g., explanation of labels and their elements, SDS format and sections, etc.)
  - 4.7.1.4. How team members can obtain and use hazard information
  - 4.7.1.5. Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area.



- 4.7.1.6. Measures the employees should take to protect themselves from these hazards.
- 4.7.1.7. Statement regarding employee rights that Corewell Health is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
- 4.7.1.8. Statement regarding employee rights that as an alternative to requesting an SDS from Corewell Health, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 284-7680, or the MIOSHA General Industry Safety and Health Division at (517) 284-7750, to obtain the desired SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA divisions responsible for such requests.
- 4.7.2. Additional hazard-specific training deemed necessary may be provided at the department level, including, but not limited to:
  - 4.7.2.1. Operations in the work area where hazardous chemicals are present.
  - 4.7.2.2. Specific hazards present in the work area.
  - 4.7.2.3. Information regarding physical or health hazards posed by new products in the workplace.
- 4.7.3. Training records for initial and annual Hazard Communication Training are maintained in Workday, and any specific-hazard training is maintained at the department level.

#### **4.8. Hazardous Non-Routine Tasks**

- 4.8.1. Prior to team members starting work performing non-routine tasks, information about the hazards of the area/procedure are provided from the department leader or designated educator, such as:
  - 4.8.1.1. Specific chemical hazards.
  - 4.8.1.2. Measures taken by Corewell Health to control hazards (e.g., ventilation, fume hoods, air monitoring, use of respirators, emergency procedures, etc.).
  - 4.8.1.2. Protection/safety measures that can be taken by the team member to lessen risk of performing the task.

#### **4.9. Multi-Employer Worksites**

- 4.9.1. Non-Corewell Health employers that produce, use, or store hazardous chemicals at Corewell Health facilities in such a manner that the team members of Corewell Health may be exposed are to take the following measures:

- 4.9.1.1. Provide Corewell Health with access to SDSs for each hazardous chemical.
- 4.9.1.2. Communicate precautionary measures that need to be taken to protect Corewell Health team members during normal operating measures and in foreseeable emergencies.
- 4.9.1.3. Ensure container labels comply with MIOSHA Hazard Communication labeling standards and any other company-specific labels are explained to Corewell Health team members.
- 4.9.1.4. Ensure hazardous chemicals are used in a manner that does not result in hazardous exposure to any individuals.
- 4.9.1.5. Follow any related Corewell Health policies and procedures.
- 4.9.2. For Corewell Health process that may expose employees of another employer to hazardous chemicals, the following information is to be supplied to that employer:
  - 4.9.2.1. SDSs and any other relevant hazard information for the specific hazardous chemicals that may be encountered.
  - 4.9.2.2. Container and pipe labeling system used onsite (where applicable).
  - 4.9.2.3. Measures their employees can take to control or eliminate exposure to the hazardous chemicals.

## 5. References

- [MIOSHA Part 42, 92, 430, Hazard Communication](#)
- [MIOSHA Part 431, Hazardous Work in Laboratories: Chemical Hygiene Plan \(CHP\)](#)
- [MIOSHA Hazard Communication / GHS Training](#)
- [NFPA 704: Standard System for the Identification of Hazards of Materials for Emergency Response](#)
- [OSHA's Final Rule to Amend the Hazard Communication Standard \(2024\)](#)
- [OSHA Hazard Communication: Hazard Classification Guidance](#)
- [UNECE: About the GHS](#)

## 6. Revisions

Corewell Health reserves the right to alter, amend, modify or eliminate this document at any time without prior written notice.

## 7. Policy Development and Approval

### Document Owner:

Amy Blazejewski (Dir, Env & Life Safety)

### Writer(s):

Louise Anderson (Department Secretary)

### Reviewer(s):

Brenna Hogan (Industrial Hygienist), Jeffrey Engel (Dir Sr, Facility Management), Timothy Poszywak (Mgr, Construction Compliance)

### Approver:

Kevin Vos (SVP, Facilities)

Entities will reference associated Documentation contained within this document as applicable  
Printouts of this document may be out of date and should be considered uncontrolled.

**8. Keywords:**

Hazard Communication, Haz, Hazard, HazCom, Haz Com, HCS, Hazard Communication Standard, MIOSHA, OSHA, Workplace Hazard, SDS, Safety Data Sheet, Labels, Container Labels, Chemicals, Hazardous Chemicals, Hazardous Materials, Secondary Container, Chemical Inventory, SDS Vault, MSDS, RTK, Right To Know