Beaumont

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Laboratory Annual Safety Assessments

Document Type: Policy

I. PURPOSE AND OBJECTIVE:

- A. The Laboratory Annual Safety Assessment policy defines the four safety assessments that are completed on an annual basis: Hazardous Chemical Inventory, Fire Safety Review, Personal Protective Equipment (PPE), and Safety Inspection.
- B. Completing each safety assessment gives the Laboratory Managers/Supervisors an opportunity to identify and correct possible safety concerns that may be found in the Laboratory.

II. POLICY STATEMENT:

As defined in this policy, designated Laboratory employees will perform, complete associated forms, and retain the results of the four safety assessments.

III. ASSESSMENTS:

- A. Hazardous Chemical Inventory and Safety Data Sheets (SDS)
 - 1. Responsible employees:
 - a. Department Manager/Supervisor/designee performs the hazardous chemical inventory and SDS review as defined in the procedure section of this policy and in the <u>Laboratory Chemical</u> <u>Hygiene Plan</u>.
 - b. Campus Laboratory Safety Officer/designee will assist as defined in the procedure section of this policy.
 - 2. As hazardous chemicals are retired from the Laboratory or new hazardous chemicals are introduced, the Manager/Supervisor/designee will coordinate with the campus Laboratory Safety Officer to update the SDS database application, MSDSonline, which is located on the Beaumont intranet in the Document menu option. Each hospital campus Laboratory has a selected number of employees who have access in MSDSonline to add or archive SDS from designated Laboratory locations. The access is referred to as "MSDSonline manager security role".
 - 3. On an annual basis, each Laboratory Manager/Supervisor/designee will perform a review of their department's hazardous chemicals. The annual review includes performing an inventory of the hazardous chemicals located in the Laboratory department and confirming each hazardous

chemical's SDS, for the associated manufacturer, displays in their department specific location within MSDSonline. Directions for accessing MSDSonline can be found in the MSDSonline Job Aid document in the attachment section of this policy.

- 4. Each hazardous chemical located in a Laboratory department must have a corresponding SDS, for the specific manufacturer, available for employees to review in MSDSonline.
- 5. The primary electronic storage of SDS and access to a department's hazardous chemical inventory is the specific Laboratory department location within MSDSonline. An up-to-date electronic or paper copy of the hazardous chemical inventory can be posted within the department for laboratory employees and inspectors (including the Fire Marshall).

B. Fire Safety Review

- 1. Responsible Laboratory employees:
 - a. Manager/Supervisor/designee performs the fire safety review following the campus Laboratory fire policies. The safety review documentation is sent to the campus Laboratory Safety Officer as indicated in campus specific policy.

C. Personal Protective Equipment (PPE) Assessment

- 1. Responsible Laboratory employees:
 - a. Manager/Supervisor/designee performs the PPE assessment following the Corporate Safety (Environment and Life Safety) policy: <u>Personal Protective Equipment MIOSHA</u>. A copy of the completed PPE assessment is sent to the campus Laboratory Safety Officer.

D. Laboratory Safety Inspection

- 1. Responsible Laboratory employee:
 - a. Campus Laboratory Safety Officer or designee performs the safety inspection following the procedure steps in this policy and the inspection checklist document found in the attachment section.
 - b. Manager/Supervisor/desginee reviews the results of the safety inspection and determines the appropriate corrective action.

IV. PROCEDURE:

A. Hazardous Chemical Inventory and SDS

- 1. Identifying a hazardous chemical:
 - a. Refer to the <u>Laboratory Chemical Hygiene Plan</u> and <u>Hazard Communication Program</u> for information on how to identify a hazardous chemical.
- 2. Initial upload of the departments hazardous chemical inventory into the MSDSonline database application:
 - a. If a Laboratory department does not have a hazardous chemical inventory in MSDSonline for a their specific location, the Laboratory Manage/Supervisor should coordinate with the campus Laboratory Safety Officer and the Environment and Life Safety Corporate Safety Coordinator to have the inventory uploaded. A hazardous chemical inventory form can be found in the Environment and Life Safety policy: <u>Hazardous Communication Program</u>.
- 3. Export of a current hazardous chemical inventory from MSDSonline:

a. On an annual basis, the campus Laboratory Safety Officers or designee will export and email the hazardous chemical inventory from MSDSonline for each of the Laboratory departments at their campus location for Manager/Supervisor review. Directions for exporting the inventory and adding data fields into the export Excel document along with an example export can be found in the MSDSonline Job Aid documents in the attachment section of this policy.

4. Review of the hazardous chemical inventory MSDSonline exported document

- a. Laboratory department Managers/Supervisors/designee will compare the hazardous chemicals physically located in the department to the hazardous chemical inventory MSDSonline exported document to:
 - i. Determine if any hazardous chemicals needs to be added or removed (marked as not-inuse) from MSDSonline for their specific department location.
 - a. If a hazardous chemical needs to be added into MSDSonline for the specific department location, then type the full chemical name and manufacturer name directly into the exported document (Excel) and confirm that the associated SDS for the specific chemical manufacturer can be located in the main MSDSonline search. Directions for searching a SDS within MSDSonline can be found in the "MSDSonline Job Aid attachment in this policy.
 - i. If the chemical SDS is not located in MSDSonline, then access the manufacturer's website, download a copy, and email to the campus Laboratory Safety Officer who will coordinate the upload with the Environment and Life Safety coordinator.
 - b. If a hazardous chemical needs to be removed (marked as not-in-use) from the department location inventory in MSDSonline, then add a comment on the specific chemical row in the exported document (Excel) indicating that the chemical can be removed.
- b. The Laboratory department Managers/Supervisors/designee will complete the MSDSonline hazardous chemical Inventory exported document (Excel) for the following:
 - i. Document the storage location(s) for each of the hazardous chemicals.
 - ii. Document the approximate quantity for each hazardous chemical.
 - iii. Name and date of Laboratory employee(s) performing the inventory review.
 - iv. Document any new hazardous chemical that needs to be added into MSDSonline for a specific Laboratory location.
 - v. Document which hazardous chemical can be removed from a specific Laboratory location within MSDSonline.
- c. The Laboratory Manager/Supervisor/designee will email a copy of the completed MSDSonline exported document to the campus Laboratory Safety Officer and retain a copy in the Laboratory department for employees and inspector access.
 - i. If requested, after chemical inventory edits are made in MSDSonline, the campus Laboratory Safety Officer can export a new version of the department hazardous chemical inventory for the department Manager/Supervisor/designee.
- 5. Adding or removing SDS from a specific location in MSDSonline

- a. Employees designated as MSDSonline "manager" have the security access to add SDS (that are found in the MSDSonline E-binder) or remove (mark not-in-use) SDS from a specific location in MSDSonline. Directions for adding or removing a SDS can be found the MSDSonline Job Aid attachment in this policy.
 - i. Each campus Laboratory Safety Officer and a limited number of other Laboratory employees have been assigned as a MSDSonline manager. The Environment & Life Safety Coordinator retains the list of designated MSDSonline managers and provides basic training in the MSDSonline application.

6. ADDITIONAL INFORMATION

- a. A Laboratory department may use a different version of a hazardous chemical inventory list or form, if required by local Fire Marshals.
- b. Each campus Laboratory Safety Officer tracks the yearly completion of the Laboratory hazardous chemical inventory review for their specific campus Laboratory.
- c. Safety Officers will email end of year reminders to the Managers/Supervisors for incomplete hazardous chemical inventory review.

B. Fire Safety Review:

- 1. Each Laboratory Manager/Supervisor/designee is responsible for performing an annual fire safety review for their department. The procedure for performing the annual fire fire safety review can be found in the campus Laboratory fire safety policies.
- 2. The completed fire safety review documentation is retained by the department Manager/Supervisor and, if indicated in the fire safety policies, a copy is sent to the campus Laboratory Safety Officer.
- 3. The campus Laboratory Safety Officer tracks the yearly completion of the departments fire safety review. Safety Officers will email end of year reminders to the Managers/Supervisors for incomplete review.

C. PPE Assessment:

- Each Laboratory Manager/Supervisor/designee is responsible for performing the annual PPE Assessment for their department. The directions and the associated form (PPE Hazard Assessment Certification) for performing a PPE hazard assessment is located the Environment and Life Safety policy: <u>Personal Protective Equipment - MIOSHA</u>.
- 2. The completed PPE Hazard Assessment Certification form is retained by the department Manager/ Supervisor and a copy is sent to the campus Laboratory Safety Officer.
- 3. The campus Laboratory Safety Officer tracks the yearly completion of the departments PPE Assessment. Safety Officers will email end of year reminders to the Managers/Supervisors for incomplete PPE Assessment forms.

D. Laboratory Safety Inspection:

- The campus Laboratory Safety Officer or designee is responsible for performing the annual Laboratory safety inspection at their assigned Laboratory campus. The Laboratory Safety Officer should coordinate the inspection date with the individual department Manager/Supervisors, Safety Representative, or Lead Laboratory Technologist.
- 2. The Laboratory Safety Inspection checklist follows the College of American Pathologists (CAP) Laboratory General safety checklist questions and includes standards from Michigan Occupational

Safety and Health Administration (MIOSHA).

- 3. The Laboratory Safety Inspection checklist can be found in the attachment section of this policy.
 - a. The Safety Inspection Checklist contains two sections:
 - i. Section A contains the safety questions with check boxes to indicate if the laboratory department is in compliance with the safety question. Mark "Yes" for compliance to all items in the question, "No" if not fully in compliance or "Not Applicable" (NA) if the question doesn't apply to the department.
 - ii. Section B is divided in three parts:
 - a. The first section is dedicated to the Safety Officer's inspection non-compliance (deficiencies) discoveries.
 - b. The second section is dedicated to the Manager/Supervisor follow-up to the noncompliance discoveries.
 - c. The third section is dedicated to miscellaneous Safety Officer notes.
- 4. The campus Laboratory Safety Officer will print a copy of the Laboratory Safety Inspection checklist and email a copy to the department employee who is partnering with the safety inspection.
- 5. Upon arrival in the Laboratory department, the Safety Officer and the partnering employee will use the Safety Inspection Checklist to perform the safety inspection. Deficiencies that can be corrected during the inspection should be made and noted on the inspection checklist (e.g. storage in front of a fire extinguisher). Deficiencies discovered during the inspection that need follow-up by the department Manager/Supervisor should be noted on the inspection checklist and, if possible, communicated in-person to the Manager/Supervisor during the inspection.
- 6. Upon completion of the safety inspection, the Safety Officer will download an electronic copy of the Laboratory Safety Inspection Checklist found in the attachment section of this policy. The Safety Officer will transfer the manual inspection documentation into into the electronic Laboratory Safety Inspection Checklist and email a copy to the Laboratory department Manager/Supervisor.
- 7. The department Manager/Supervisor/designee will resolve deficiencies discovered during the safety inspection, to the best of their ability, document the corrective action(s) on the Laboratory Safety Inspection checklist, and email a copy of the document to the Safety Officer.
- 8. The completed Laboratory Safety Inspection Checklist is retained by the campus Laboratory Safety Officer and a copy is sent to the System Quality and Safety Manager.
- 9. The safety inspection results should be shared with the Safety Committee members for learning purposes.
- 10. The Laboratory Safety Quality Coordinator is responsible for updating the Laboratory Safety Inspection Checklist as new or edited CAP and MIOSHA standards are published.

E. Final Instruction

- 1. The four Laboratory safety assessments can be performed at anytime during the calender year, however, a suggested completion data range is offered in the table in the Reference section of this policy.
- 2. Each campus Laboratory Safety Officer will contact the Laboratory Managers/Supervisors to communicate the safety assessment that are due for the calendar year.
- 3. The assessment forms (Hazardous Chemical Inventory, Fire Safety Drills, PPE Assessment, and

Laboratory Safety Inspection) will be retained by the department Laboratory Manager/Supervisors and a copy is sent to the campus Laboratory Safety Officers.

V. REFERENCE:

Policies: Laboratory Chemical Hygiene Plan Hazard Communication Program

MIOSHA published standards: MIOSHA Standards

Contact the Laboratory Quality and Safety System Manager for the current version of the CAP Checklist

Suggested calendar schedule for completing the safety assessments:

Safety Assessment Task	Suggested Date Range
1. Hazard Chemical Inventory	Jan - March
2. Fire Safety Review	April - June
3. PPE Hazard Assessment	July - Sept
4. Laboratory Safety Inspection	Oct - Dec

Attachments

Laboratory Safety Inspection Checklist.pdf MSDSonline Hazardous Chemical Export_Troy Chemistry example.xls MSDSonline _Add or Remove SDS from Lab Location.pdf MSDSonline _Exporting Hazardous Chemical Inventory.pdf MSDSonline _Log on_SDS and Location search_ Open a SDS.pdf

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Applicability

Dearborn, Farmington Hills, Grosse Pointe, Royal Oak, Taylor, Trenton, Troy, Wayne