STATE OF OHIO

DEPARTMENT OF REHABILITATION AND CORRECTION

SUBJECT: **Hazard Communications and Chemical Control Guidelines**	PAGE 1 OF 17 NUMBER: 10-SAF-12
RULE/CODE REFERENCE: 29 CFR 1910.1200 29 CFR 1910.120	SUPERSEDES: 10-SAF-12 dated 03/06/15
RELATED ACA STANDARDS: 4-4215; 2-CO-3B-01; 2-CI-1A-7; 2-CI-1A-8; 2-CI-1B-04; 2-CTA-3B-09	EFFECTIVE DATE: June 1, 2016
	APPROVED:

I. AUTHORITY

This policy is issued in compliance with Ohio Revised Code 5120.01 which delegates to the Director of the Department of Rehabilitation and Correction the authority to manage and direct the total operations of the Department and to establish such rules and regulations as the Director prescribes.

II. PURPOSE

The purpose of this policy is to ensure that Ohio Department of Rehabilitation and Correction (DRC) employees and inmates are informed about the hazardous chemicals in their workplace and how to properly use them to avoid potential accidents and injuries. It is also the purpose of this policy to establish procedures for the inventory, control and use of all chemicals.

III. APPLICABILITY

This policy applies to all persons employed by or under contract with the Ohio Department of Rehabilitation and Correction (DRC) located at Operation Support Center (OSC), the Corrections Training Academy (CTA), the Franklin Medical Center (FMC) and an institution or Ohio Penal Industry (OPI) site. This policy is only applicable to Division of Parole and Community Services (DPCS) operations located within the aforementioned locations.

IV. DEFINITIONS

ACMI (AP) & (CL) Sealed Product - Identifies art materials that are safe and that are certified in a toxilogical evaluation by a medical expert to contain no materials in sufficient quantities to be toxic or injurious to humans, including children, or to cause acute or chronic health problems.

Chemical Box - A designated securable container used to distribute and temporarily store frequently used chemicals, whether hazardous or non-hazardous, and any additional items approved by the institutional safety and health coordinator. The containers or chemical products stored in the containers are issued from a central chemical distribution location.

Class I Liquid (Flammable Liquid) - Any liquid that has a closed-cup flash point below 100 degrees Fahrenheit.

Class II Liquid (Combustible Liquid) - Any liquid that has a closed-cup flash point at or above 100 degrees Fahrenheit.

Class IIIA Liquid (Combustible Liquid type) - Any liquid that has a closed-cup flash point at or above 140 degrees Fahrenheit but below 200 degrees Fahrenheit.

Combustible Liquid - Any chemical that has a flash point between 100 and 200 degrees Fahrenheit.

Fire Area - An area of a building separated from the remainder of the building by construction having a fire resistance of at least one (1) hour and having all communicating openings properly protected by an assembly having a fire resistance rating of at least one (1) hour. These areas should be labeled on the facility building diagrams and if not, facilities need to consult the Bureau of CAMS for any questions related to properly identifying such areas.

Flammable Liquid - Any chemical that has a flash point below 100 degrees Fahrenheit.

Hazard Evaluation Procedure - A facility procedure designed to ensure proper chemical storage, use, supervision level assignment, and classification as Severe/Serious hazardous, Moderate hazardous or Low/non-hazardous. The criteria used to determine the hazard level and the level of supervision can be found in the hazard(s) identification section #2 of the chemical's SDS.

Health Hazard - Chemicals that can be classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Inside Liquid Storage Area - Often referred to as a "blowout room", this is a room or building used for the storage of liquids in containers or portable tanks, separated from other types of occupancies. These areas should be labeled on the facility building diagrams and facilities need to consult the Bureau of CAMS for any questions related to properly identifying such areas.

Low/Non- Hazardous - A chemical which is NOT classified as a physical hazard or health hazard by the manufacturer. Chemicals defined as Low/Non-hazardous shall NOT contain a Signal Word or Pictogram as listed in the hazard(s) identification section #2 of the SDS.

Moderate Hazardous Chemical - A moderate hazardous chemical which is classified by the manufacturer as a physical hazard or a health hazard, or hazard not otherwise classified, AND as a concentrate or diluted form these chemicals are assigned a Signal Word of WARNING as listed in the hazard(s) identification section #2 of the SDS.

Personal Protective Equipment - Commonly referred to as "PPE", is equipment worn to minimize exposure to a variety of hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.

Physical Hazard - A chemical for which there is scientifically valid evidence it is an: explosive; flammable

(gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

Portion Pack - A small (typically 4-ounce) plastic packet that contains concentrated chemical product that comes pre-measured for quick and easy mixing with a gallon of water.

Safety Can - A listed container, of not more than 20 L (5.3 gallons) capacity, having a spring-closing lid and spout cover and so designed that it will safely relieve internal pressure when subjected to fire exposure.

Safety Data Sheet (SDS) - A document containing information and instructions on hazardous materials present in the workplace. SDS contain details about hazards and risks relevant to the substance, requirements for its safe handling, and actions to be taken in the event of fire, spill, or overexposure. The descriptive data provided on a data sheet required by the Occupational Safety and Health Administration (OSHA) to provide information regarding the hazards of materials to prevent and respond to emergency situations.

Severe/Serious Hazardous Chemical - A severe/serious hazardous chemical which is classified by the manufacturer as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified, AND as a concentrate or diluted form these chemicals are assigned a Signal Word of DANGER as listed in the hazard(s) identification section #2 of the SDS.

Supervision Level - The level of staff supervision required for inmates to use chemicals in the following categories:

Direct: Chemicals identified as Severe/Serious Hazardous utilizing the hazard(s) identification section #2 of the SDS with a Signal Word of DANGER. Inmates using chemicals with this classification shall be directly supervised by a staff member (e.g. maintenance staff directly supervising inmate work crews using hazardous chemicals).

Intermittent: Chemicals identified as Moderate Hazard utilizing the hazard(s) identification section #2 of the SDS with a Signal Word of WARNING. Inmates using chemicals with this classification shall be supervised through general observation by a staff member (e.g. housing unit correction officers monitoring daily housekeeping duties performed by inmates).

Low: Chemicals identified as Low/Non-Hazardous utilizing the hazard(s) identification section #2 of the SDS with no classification. These chemicals shall contain no Signal Word or Pictogram in section #2 of the SDS. Inmates may use these chemicals without staff supervision.

V. POLICY

It is the policy of the Ohio Department of Rehabilitation and Correction (DRC) to establish and maintain uniform procedures for the safe storage and usage of hazardous materials in accordance with OSHA hazard communication standard (HCS) 29 CFR 1910.1200, the Globally Harmonized System (GHS) and 29 CFR 1910.120, as well as other applicable city, state and federal requirements. DRC shall make every effort to protect the health and safety of all employees, inmates, visitors, or others through adequate inventory, control and use of chemicals.

VI. PROCEDURES

A. Facility Written Hazard Communication Program

The safety and health coordinator shall develop a written hazard communication program. The program shall describe how the institution/office plans to ensure the hazardous chemicals used at the worksite are properly evaluated and appropriately labeled; identify the locations of the Safety Data Sheet (SDS) forms, and how the institution/office shall provide specific hazard information and training. The written hazardous communication program shall also contain a current list of chemicals identified as hazardous. A copy of the written hazardous communications program shall be made readily available to all staff. The following guidelines shall be adhered to and practiced in the development and implementation of all facility hazard communication programs**:**

1. Hazard Evaluation and Identification Procedure

    a. Prior to any chemical product, including paints and oils, being purchased or received by any facility, the hazard evaluation process shall occur. Each area supervisor shall be responsible for obtaining a SDS from the manufacturer or supplier prior to any chemical brought into the institution/office. Additionally, it is the responsibility of each work area supervisor to ensure the least dangerous chemical is used to complete tasks in their area. All chemical products must be approved by the safety and health coordinator prior to being purchased and/or brought into the facility. Each area supervisor is responsible for following the chemical approval process by completing the DRC Chemical Approval form (DRC1885e). The area supervisor shall be responsible for ensuring the chemical product has been approved by the safety and health coordinator and this approval is properly documented on the chemical approval form (DRC1885e) prior to submitting with the Request to Purchase and/or other documentation for other types of purchases (e.g. credit card). The completed DRC Chemical Approval form (DRC1885) shall be maintained in the area where the chemicals are stored. The chemical approval process and form shall be completed for all initial and new chemical purchases. It is at the discretion of the managing officer whether or not to require staff to complete the chemical approval form (DRC1885e) for all chemical re-orders (subsequent orders of same products).

    b. The safety and health coordinator shall classify the hazard level and supervision level of chemicals using the definitions of Severe/Serious Hazard, Moderate Hazard, and Low/Non-Hazard in this policy and the hazard(s) identification section #2 of the SDS. All Severe/Serious and Moderate hazardous chemical products shall also have their health and/or physical hazards identified and these shall be included on the hazardous chemical lists.

    c. Hazardous Chemical Lists: The work area supervisor shall forward a current list of all known Severe/Serious and Moderate hazardous chemicals used in their specific area to the safety and health coordinator. The list shall be updated any time there is a change or at least annually. The safety and health coordinator shall confirm the hazardous chemical listing for each area. The safety and health coordinator shall maintain a master list of all chemicals within the facility that have been identified as hazardous. Hazardous chemical lists for each area shall also be readily accessible where hazardous chemicals are stored.

2. Chemical Labeling

a. Each institution area supervisor with chemicals in their area (s) shall be responsible for the proper labeling of all chemicals and for maintaining on file a SDS for all chemicals in their work area(s).

b. All labels on chemical containers shall indicate the chemical's identity (name). The chemical's identity shall be the same as the name on the SDS and hazardous chemical list (if hazardous). Where the SDS provides a chemical identity other than found on the manufacturer's label, the safety and health coordinator shall note any differences on the SDS and master chemical list accordingly.

c. Additional Specific Labeling Guidelines for Hazardous Chemicals: All chemical containers that contain a hazardous chemical shall be labeled with the manufacturer's labeling which shall include the product identifier; signal word; hazard statement(s); precautionary statement(s); pictogram(s); and name, address and telephone number of the chemical manufacturer, importer, or other responsible party.

d. Chemicals transferred from a labeled container or diluted from a concentrate to a ready to use product and placed into a secondary container shall be labeled with the manufacturer's label or labeled with a workplace label that either provides all of the required information that is on the label from the chemical manufacturer or, the product identifier and signal words, pictures, symbols or a combination thereof, which, in combination with other information, immediately available to employees, provide specific information regarding the hazards of the chemicals. At a minimum, work place labels shall incorporate the use of Signal Words where required. Each institution's local written hazardous communication program shall outline the required information for workplace labeling for secondary containers.

e. In cases where the manufacturer's label does not contain the required elements outlined in section VI.A.2.c of this policy, the SDS is designed and may be utilized to supplement this information on the product label. However, in such cases, the container shall have the chemical identity and, where required, the appropriate Signal Word - Danger or Warning on the label and the SDS that contains the manufacturer's name, address, and emergency telephone number shall be readily accessible to all persons that use the product by storing the SDS in the area/cabinet with the hazardous chemical.

3. Safety Data Sheets (SDS)

a. Safety Data Sheets (SDS) shall be readily accessible to all employees for each chemical used in their area. A master SDS hard file of all chemicals used within the facility shall be maintained by the safety and health coordinator and in the medical department at the institutions and other designated areas in non-institutional DRC facilities.

b. The information on the SDS that comply with the new HCS and GHS shall include:

i. Section 1, Identification;
ii. Section 2, Hazard(s) identification;
iii. Section 3, Composition/information on ingredients;
iv. Section 4, First-aid measures;
v. Section 5, Fire-fighting measures;
vi. Section 6, Accidental release measures;
vii. Section 7, Handling and storage;
viii. Section 8, Exposure controls/personal protection;
ix. Section 9, Physical and chemical properties;
x. Section 10, Stability and reactivity;
xi. Section 11, Toxicological information.
xii. Section 12, Ecological information;
xiii. Section 13, Disposal considerations;
xiv. Section 14, Transport information;
xv. Section 15, Regulatory information; and
xvi. Section 16, other information, including date of preparation or last revision.

If any of the above information mandated by Appendix D of 29 CFR 1910.1200 is not available on an SDS, the safety and health coordinator shall not approve the use of the product until all the required information is obtained from the manufacturer by the work area supervisor. If no relevant information is found for any sub-heading within a section on the safety data sheet, the chemical manufacturer, importer or employer preparing the safety data sheet shall mark it to indicate that no applicable information was found.

4. Employee and Inmate Training

a. All employees shall be trained in the safe usage and labeling of hazardous materials, how to understand the SDS, the use of PPE and the emergency procedures to be followed for hazardous material spills and physical contact with hazardous materials.

b. Each work area supervisor shall be responsible for ensuring chemicals are being used as intended and that each inmate receives training of proper use, handling, dilution, and required PPE prior to using any chemical. This training shall address the safe usage and handling of each hazard category of chemicals (e.g. corrosives, flammables, etc.) or specific chemicals used as all are unique and may have different protective equipment requirement.

c. This training shall be documented for inmates on the Inmate Training Form (DRC1953) and for employees as required by DRC policy 39-TRN-09, Training Record Keeping. The inmate training documentation shall be scanned to the inmate's electronic file in OnBase.

d. During the seven (7) calendar day institution orientation program, inmates shall receive information on the proper handling and safe usage, including Personal Protective Equipment (PPE) availability, of the chemicals used for cleaning their cells/bed areas. Documentation of receiving this information shall be included on the Inmate Orientation form (DRC4141). The Inmate Training Form (DRC1953) does not

need to be completed for inmates trained on cell cleaning chemicals for the purpose of their job duties (e.g. porters) when the information is already documented on the Inmate Orientation form (DRC4141).

B. General Chemical Use and Storage Guidelines

1. Each work area supervisor shall be responsible for ensuring all chemicals are properly labeled, stored, used as intended, all chemical inventories are accurate, up-to-date, and all chemicals are being properly controlled.

2. It is the responsibility of each work area supervisor to ensure the required PPE as applicable is available.

3. The storage of combustible and flammable products shall be compliant with applicable Ohio Fire Codes (NFPA 30). The following guidelines must be followed (consult each product's SDS to obtain the flash point information and the definition section of this policy necessary to determine what guideline is applicable to the product) when products are stored inside of buildings that are classified as Group I-3 as defined in Ohio Administrative Code 4101:1-3-01, Use and Occupancy Classifications.

   a. Only 5 L (1.3 gallons) of Class I liquids that are not contained in a safety can may be stored outside of an inside liquid storage area (e.g. blowout room) or flammable storage cabinet. If Class I liquids are contained in a safety can then the allowable amounts to be stored outside of an inside liquid storage area (e.g. blowout room) or flammable storage cabinet can be increased to 10 L (2.6 gallons);

   b. Only 10 gallons of the combined volume of Class I and Class II liquids that are not contained in a safety can be stored in a single fire area outside of an inside liquid storage area (e.g. blowout room) or flammable storage cabinet. The amount of Class I liquids in this combined volume of liquids NOT contained in safety cans shall not exceed 5 L (1.3 gallons);

   c. For Class I and Class II liquids stored in a safety can, the combined volume of Class I and Class II liquids that may be stored inside a single fire area and outside of a liquid storage area (e.g. blowout room) or flammable storage cabinet shall not exceed 95 L (25 gallons). The amount of Class I liquids in this combined volume of liquids contained in safety cans shall not exceed 10 L (2.6 gallons).

   d. 230 L (60 gallons) of Class IIIA liquids may be stored outside of an inside liquid storage area or flammable storage cabinet.

   e. Any combustible and/or flammable products contained in above or below ground tanks shall be in compliance with NFPA 30.

4. When not in use, all chemicals shall be stored in a secure area.

5. Inmates may use Severe/Serious and Moderate Hazard chemicals under the appropriate supervision level as defined by this policy.

6. For Use Group F-1, F-2, And S-1, S-2 classifications refer to Ohio Fire Code Rule 34 Table 3404.3.4.1 for allowable quantities.

7. The storage of chemicals shall take into account the compatibility of the chemical with other substances as listed on the SDS. Incompatible chemicals shall be stored separately (e.g. corrosives and flammables).

C. Chemical Inventory Guidelines

The following guidelines apply to both hazardous and non-hazardous chemical inventory practices.

1. All chemicals shall be identified as being Severe/Serious Hazard, Moderate Hazard, or Low/Non-Hazardous on the Chemical Inventory Log form (DRC1886). Unless otherwise directed in this policy, all chemicals shall be inventoried as they are used or monthly when not used on the Chemical Inventory Log (DRC1886). For chemicals that are distributed from a centralized distribution area, the Chemical Inventory Log (DRC1886) shall be maintained in the centralized area and updated each time a chemical product is distributed and returned. When a work area is closed exceeding one (1) week due to illness, vacation, etc., chemicals shall be inventoried as soon as the work area is opened. Upon re-opening of the shop, an inventory shall be completed and the reason for the closure shall be documented in the comment section.

2. All chemicals contained in aerosol cans or tubes shall be inventoried as full until empty.

3. Gas cylinders shall be maintained by cylinder count (e.g. welding gas cylinders, propane tanks) and inventoried monthly on the chemical inventory log (DRC1886). Any items in cylinders/tanks that can be removed and used outside of the area they are stored in shall be signed in/out on the chemical inventory log (DRC1886) and returned to their storage area at the end of each work day. All gas cylinders shall be chained or otherwise secured in an upright position.

4. Pre-measured chemical portion packs shall be inventoried by case until opened, then inventoried by pack.

5. Severe/Serious Hazard Chemicals

   In addition to the above requirements, Severe/Serious Hazard chemicals shall be inventoried as follows:

   a. Severe/Serious Hazard chemicals shall be inventoried daily when removed from the secure chemical storage room/cabinet or used on the Chemical Inventory Log (DRC1886). The employee that removes the Severe/Serious Hazard chemical from the secure chemical room/cabinet shall be responsible for properly documenting the issue and return, along with the appropriate inventory of chemical contents by the end of each work day on the Chemical Inventory Log (DRC1886). This process shall include the employee verifying that all Severe/Serious Hazard chemicals he/she removes from the secure chemical storage room/cabinet are returned or properly disposed of and make sure a proper inventory is documented as required.

b. If the container is clear, the inventory shall reflect ¼, ½, ¾ or full. If a chemical container is clear and has permanent markings for content levels such as ¼, ½, ¾, on the bottle (e.g. OPI products) the Severe/Serious Hazard chemical shall be inventoried by rounding upwards. The Severe/Serious Hazard chemical shall be considered full if the contents of a bottle are above the ¾ mark. For example, if the contents of a bottle or container are in between ½ and ¾, the chemical inventory shall reflect ¾.

c. All Severe/Serious Hazard chemicals in powdered form shall be inventoried by descending weight to include those in clear containers. Inventories shall be documented on the Chemical Inventory Log (DRC1886).

d. All barrels containing Severe/Serious Hazard chemicals utilized outside of a chemical dispensing system shall be inventoried by descending gallon and/or weight. Inventories shall be documented on the Chemical Inventory Log (DRC1886).

e. All other Severe/Serious Hazard items where amounts cannot be seen (e.g. Severe/Serious Hazard paint cans, gas cans) shall be inventoried as closely as possible by estimating standard the contents of the container in ¼, ½, ¾, and full increments. * Example: gasoline transferred from 5 gallon safety can to power equipment shall be estimated as closely as possible (e.g. issued: ¼ of the can's contents, ending balance: ¾ of can's contents).

6. Moderate and Low/Non-Hazardous Chemicals

In addition to the guidelines in section VI.C.1-3 of the policy, Moderate Hazard and Low/Non-Hazardous chemicals shall be inventoried as follows:

a. Moderate Hazard and Low/Non-Hazardous chemicals shall have a perpetual inventory (e.g. case, pack, barrel, or container count) maintained on the Chemical Inventory Log (DRC1886) at the chemical storage room/cabinet. Moderate Hazard and Low/Non-Hazardous chemicals shall be signed in and out on the Chemical Inventory Log (DRC1886) when the chemical is issued to be used out of the work area, including central chemical distribution areas.

b. All Moderate and Low/Nonhazardous chemicals in powdered form and barrels shall be inventoried by perpetual count (case, pack, barrel, or container count), to include those in clear containers.

7. Chemical Box Distribution Procedures

a. Chemical boxes containing only Low/Non-hazardous and/or Moderate Hazardous chemicals with a supervision level of Low and/or Intermittent shall be returned to central chemical at least weekly and inventoried. All inventories shall be documented on the Chemical Inventory Log (DRC1886).

b. Chemical boxes in inmate housing areas that contain Severe/Serious Hazard chemicals with a supervision level of Direct shall be returned to the secure central distribution point on a daily basis and inventoried.

c. In areas outside of inmate housing units, chemical boxes containing Severe/Serious Hazard products with a supervision level of Direct may be maintained in the area without being returned to the secure central distribution point daily. In such cases, the Severe/Serious Hazard chemical(s) shall be inventoried by the responsible area supervisor at the end of each workday and returned to the central distribution point at least weekly. All inventories shall be documented on the Chemical Inventory Log (DRC1886), as directed by the Severe/Serious Hazard chemical guidelines of this policy.

d. All chemical boxes shall have a Chemical List (DRC1895) indicating chemical contents and corresponding supervision level maintained in the box at time of delivery (e.g. 3 quarts window cleaner (Intermittent), 1-quart cleanser (Direct), or 15 packets of floor cleaner (Low).

e. All chemical boxes returned for refill shall include the applicable chemical containers, excluding disposable plastic packets, listed on the Chemical List (DRC1895) maintained in the box. An Incident Report (DRC1000) and Incident Report Supplement (DRC1001) shall be completed when the containers listed do not match the contents list. Redistribution shall not be completed until a thorough search has been conducted.

f. Upon reporting for duty, each shift correction officer assigned to a post with chemicals shall account for the applicable chemical containers listed on Chemical List (DRC1895) maintained in the box and note the findings in the log book where applicable. The supervisor shall be notified of any missing containers. The accountability procedure shall occur at the beginning of each work period that the area is occupied/opened (e.g. correctional officers log entries at beginning of shift).

g. For any post/area that does not have a log book or assigned correction officer, each facility shall establish a local procedure that ensures staff account for the applicable chemical containers listed on the Chemical List (DRC1895) maintained in a chemical box and ensure documentation of accountability is available. The accountability procedure shall occur at the beginning of each work period that the area is occupied/opened (e.g. correction officers log entries at beginning of shift).

h. All chemical boxes shall remain locked when not in use.

8. Chemical Dispensing System Procedures

a. Where dilution of chemicals is required and/or chemical dispenser systems are used, the bulk quantity shall be distributed from the central distribution area in quantities that shall immediately be placed into locked containers. Redistribution shall not occur until the empty container is returned and exchanged for full containers.

b. The bulk items shall be inventoried by perpetual count from the central distribution area to the dispenser utilizing the Chemical Inventory Log (DRC1886).

c. Any chemical that remains Severe/Serious Hazard in its diluted form shall not be utilized by any institution without properly inventorying, storing and controlling

diluted contents in accordance with the Severe/Serious Hazard chemicals section of this policy.

d. All chemical dispensing units and areas shall be locked when not in use.

e. Each work area supervisor shall be responsible for ensuring chemicals are being used as intended and properly diluted per the manufacturer's recommendations and/or directions. Proper dilution methods include, but are not limited to:

i. Use of dilution systems designed for the product;
ii. Correct dilution system components;
iii. Proper dilution ratio;
iv. Water supply pressure;
v. Availability and utilization of PPE;
vi. Secondary container labeling; and
vii. Chemical inventory.

f. The safety and health coordinator shall check the concentration of diluted disinfectants and/or sanitizing chemicals by using the appropriate test strips or titration kits at least monthly during the Fire/Safety/Sanitation Monthly Inspection.

D. Specialized Inventory and Control Procedures for Specific Areas and/or Types of Chemicals

1. These guidelines apply only to inventory and control procedures. Labeling and SDS requirements are the same for all chemicals.

a. Agricultural medications do not need to be inventoried according to this policy.

b. Institutional warehouses shall keep chemical inventory in a real time format by utilizing the ODRC Inventory Manager Computer program for bulk warehouse inventory only. All chemicals utilized for operations within the warehouse shall be managed according to other requirements of this policy.

c. Low/Non-Hazardous chemicals utilized in compliance with DRC policy 77-REC-05, Arts and Crafts Activities, that show the mark ACMI AP or CL on the manufacturer's label do not need to be inventoried according to this policy.

d. Low/Non-Hazardous hand soap, instant hand sanitizer (non-flammable type only), sidewalk salt, non-chlorinated laundry detergent, non-chlorinated dish detergent, and personal hygiene products need not be inventoried according to this policy. Also, the approval by the Safety and Health Coordinator and the completion of the DRC Chemical Approval form (DRC1885e) is not required for these products. Any employee or area that purchases or possesses any of these products must be able to provide proof (e.g. SDS) that such products are non-hazardous as defined by this policy.

e. Institution commissary products shall all be Low/Non-Hazardous unless approved by the safety and health coordinator and medical health authority (necessary medical products). Hazardous chemical products in commissary areas shall be handled, stored

and inventoried as required by section VI.C.5.a-e of this policy.

2. Medical Areas

Chemical substances (Severe/Serious Hazardous, Moderate Hazard and Low/Non-Hazardous) utilized for the sole purposes of providing medical services to staff and inmates (e.g. alcohol pads, dental substances) shall be controlled and inventoried using the following guidelines:

a. All items shall be controlled by employees at all times and not utilized or possessed by inmates at any time unless medically prescribed.

b. All bulk quantities of medical chemicals shall be kept in a secured storage room. Only the quantities necessary to complete the medical tasks at hand shall be authorized to be issued from the bulk storage room and maintained throughout other medical areas (e.g. exam rooms, nurse's station). The storage of flammable and/or combustible products must follow guidelines VI.B.3 of this policy.

c. All medical area chemicals in storage shall have a perpetual inventory (e.g. case, pack or container count) maintained on the Chemical Inventory Log (DRC1886) at the chemical storage room. The Chemical Inventory Log (DRC1886) shall indicate the quantity and location of where issued items are being stored and used. All chemicals shall be inventoried as used, distributed, or monthly when not used or distributed and this inventory shall be documented on the Chemical Inventory Log (DRC1886). For example, if there are ten (10) boxes of alcohol pads in secure storage and one (1) box is distributed to Exam Room A, the inventory would reflect a perpetual count of nine (9) boxes in storage and one (1) box being distributed to Exam Room A.

d. Moderate and Low/Non-Hazardous chemical products used for medical purposes and that are stored in the pharmacy and are being controlled under pharmacy guidelines shall be exempt from this policy. The pharmacy shall maintain an updated chemical list and SDS for all chemical products stored in the pharmacy. All other medical area chemicals in storage shall have a perpetual inventory (case, pack, or container count) maintained on the Chemical Inventory Log (DRC1886) at the chemical storage room. The Chemical Inventory Log (DRC1886) shall indicate the quantity and location of where issued items are being stored and used. All chemicals shall be inventoried as used, distributed, or monthly when not used or distributed and this inventory shall be documented on the Chemical Inventory Log (DRC1886). For example, if there are ten (10) boxes of alcohol pads in secure storage and one (1) box is distributed to Exam Room A, the inventory would reflect a perpetual count of nine (9) boxes in storage and one (1) box being distributed to Exam Room A.

e. All medical areas issued chemicals from the secure chemical storage area shall also maintain an accurate list of all chemicals in that area on the Chemical List Form (DRC1895). This list shall have a perpetual inventory (e.g. case, pack or container count) maintained on the medical chemical products being used in that specific area. Again, the example would be a Chemical List form in Exam Room A with one (1) box of alcohol pads that was distributed from the bulk storage area in medical. It is not necessary to maintain a count of individual alcohol pads from open boxes as the open

box is counted full until empty and is properly inventoried on the Chemical Inventory Log (DRC1886).

f. Exam rooms containing chemical products shall be secured when not in use.

g. Oxygen tank cylinders shall be stored in a secure storage area and inventoried monthly by perpetual cylinder count on the Chemical Inventory Log (DRC1886). Any cylinders/tanks that can be removed and used outside of the area in which they are stored (e.g. tanks that remain with inmates that are on constant oxygen) shall be signed in/out on the Chemical Inventory Log (DRC1886). All cylinders shall be chained or otherwise secured in an upright position.

3. Institution Armories and Lockshops

Hazardous and non-hazardous chemicals utilized within secured Armories and Lockshops (e.g. gun cleaning oil, lock mechanism lubricants) shall be controlled and inventoried using the following guidelines:

a. All armory/lockshop chemicals shall be controlled by employees at all times and not utilized or possessed by inmates at any time. The storage of flammable and/or combustible products must follow guidelines B-3 of this policy.

b. All chemicals shall have a perpetual inventory (e.g. case, pack or container count) maintained on the Chemical Inventory Log (DRC1886) inside these areas. Any items removed from these areas shall be documented on the Chemical Inventory Log (DRC1886) and the quantity and location of where issued items are used shall be indicated. For example, if there are three (3) cans of WD-40 in secure Lockshop storage and the locksmith takes one (1) can to Unit D to work on a locking mechanism. The Chemical Inventory Log in the Lockshop would reflect a count of two (2) cans in storage and one (1) being issued to Unit D on the Chemical Inventory Log (DRC1886). All chemicals shall be inventoried as used, distributed, or monthly when not used or distributed and this inventory shall be documented on the Chemical Inventory Log (DRC1886).

c. All chemicals removed from these areas shall be returned to the secure areas by the end of each work day and a documented inventory shall be completed on the Chemical Inventory Log (DRC1886).

d. Armory munitions shall be controlled and inventoried as required by DRC policy 310-SEC-28, Armory Control, Storage, and Use.

4. Institution Employee Carwash Programs

The following guidelines shall be followed by all facilities that permit an employee carwash program:

a. Only Low/Non-Hazardous and Moderate hazardous cleaning products shall be authorized for use with carwash and detailing programs.

b. With the permission of the managing officer, employees may bring in their own chemical products for use in having their car washed and/or detailed. Where permitted, the area supervisor responsible for the carwash program shall establish a list of Low/Non-Hazardous or Moderate hazardous chemical cleaning products that employees are permitted to bring on the outside grounds of the facility for the sole purpose of having their car washed and/or detailed. The area supervisor shall also maintain the SDS forms for each authorized chemical product. The area supervisor shall maintain an accurate list of these chemicals on the Chemical List Form (DRC1895). The Chemical List Form (DRC1895) shall be posted in the area where the cars are washed.

c. The area supervisor responsible for the carwash program shall maintain copies of the SDS forms for the approved carwash program cleaning chemicals in the area that the chemical products are used.

5. The following guidelines shall be followed by all facilities that permit an auto repair vocational program for employee use:

a. Where auto repair vocational programs exist, employees are permitted to bring chemical products on the grounds of the facility for the sole purpose of having their car repaired and/or maintained. The employee shall obtain a copy of the SDS forms for each chemical product necessary for repairing their car and list each chemical on an approved gate pass. The area supervisor shall maintain the SDS and approved gate pass listing the chemicals while the car is in the area for repair. The SDS and approved gate pass shall be available in the area where the cars are repaired.

b. All chemical products shall be secured when not in use. Upon repairs being completed, any unused chemicals shall be returned to the employee for removal and/or disposal away from institutional property.

6. The following guidelines shall be followed by all facilities that permit an employee shoe shine shop for employee use:

Where employee shoe shine shops are permitted, inmates may utilize hazardous shoe shine paste for polishing employee's shoes without direct staff supervision. Facilities shall ensure the quantity of each paste color is minimal and inventory shall be conducted daily by staff and at the end of each day. Quantity limitations and accountability requirements shall be specifically outlined in the facility's written local hazardous communication program.

7. Ohio Penal Industries – McKinley Building

The following guidelines shall be followed by OPI staff that utilize and/or supervise the usage of chemical products at the McKinley building:

a. All requirements directed in sections VI.A.1-4 of this policy shall be completed and followed (written hazard evaluation program, chemical labeling, SDS availability, and inmate/staff training).

b. All chemical products shall be stored in a secure area when not in use. Flammable

products shall be stored in accordance with section VI.B.3 of this policy.

c. A secure area shall be designated for the storage of chemical products that are used for the auto garage area and for the storage of cleaning chemical products. The secure area shall contain the Chemical Inventory Logs (DRC1886) for all products contained within the secure storage area. Chemical products used in the auto garage and the general cleaning chemicals shall be inventoried separately.

d. All chemicals (hazardous and non-hazardous) shall be perpetually inventoried (case, pack, or container count) as used, distributed, or monthly when not used or distributed and this inventory shall be documented on the Chemical Inventory Log (DRC1886). The Chemical Inventory Logs (DRC1886) shall indicate the quantity and location of where issued items are being used (e.g. garage).

e. Any carts containing chemicals must have an accurate list of all chemicals on the Chemical List Form (DRC1895). The Chemical List Form (DRC1895) shall be attached or maintained on the actual cart. Chemical carts containing hazardous products utilized in the vehicle service garage shall be returned to the secure central distribution point at the end of each work day. In such cases, the hazardous chemical(s) shall be accounted for by the responsible area supervisor at the end of each workday and inventoried at least weekly. All inventories shall be documented on the Chemical Inventory Log (DRC1886).

8. Ohio Penal Industries – All Sites

The following guidelines shall be followed by OPI staff that utilize and/or supervise the usage of chemical products:

a. All requirements directed in sections VI.A.1-4 of this policy shall be completed and followed (written hazard evaluation program, chemical labeling, and SDS availability).

b. All chemical products shall be stored in a secure area when not in use. Flammable products shall be stored in accordance with section VI.B.3 of this policy.

c. Staff, contractors, and inmate workers are trained in the proper use, storage, handling and disposal of hazardous chemicals. This training shall be documented for inmates on the Inmate Training Form (DRC1953) and for employees as required by DRC policy 39-TRN-09, Training Record Keeping. Documentation for contractors shall be in accordance with DRC policy 39-TRN-09, Contractor Orientation.

d. Each industry conforms to applicable laws and safety standards in the storage, handling and disposal of chemicals, waste materials, and other potential atmospheric, soil or water pollutants.

e. Any carts containing chemicals must have an accurate list of all chemicals on the Chemical List Form (DRC1895). The Chemical List Form (DRC1895) shall be attached or maintained on the actual cart. Chemical carts containing hazardous products utilized in the industry operation shall be returned to the secure central distribution point at the end of each work day. In such cases, the hazardous chemical(s) shall be

accounted for by the responsible area supervisor at the end of each workday and inventoried at least weekly. All inventories shall be documented on the Chemical Inventory Log (DRC1886).

9. Operation Support Center (OSC) Building

The following guidelines shall be followed by staff that utilize and/or supervise the usage of chemical products at OSC:

a. All requirements directed in sections VI.A.1-4 of this policy shall be completed and followed (written hazard evaluation program, chemical labeling, SDS availability, and inmate/staff training).

b. Low/Non-Hazardous hand soap, instant hand sanitizer (non-flammable type only), sidewalk salt, non-chlorinated dish detergent and personal hygiene products need not be inventoried according to this policy. Also, the approval by the Safety and Health Coordinator and the completion of the DRC Chemical Approval form (DRC1885e) is not required for these products. Any employee or area that purchases or possesses any of these products must be able to provide proof (e.g. SDS) such products are non-hazardous as defined by this policy.

c. All chemical products shall be stored in a designated secure area (s) when not in use. Flammable products shall be stored in accordance with section VI.B.3 of this policy.

d. The designated secure area shall contain the Chemical Inventory Logs (DRC1886) for all products stored within the respective secure storage area.

e. All chemical products (hazardous and non-hazardous) shall be perpetually inventoried (case, pack, or container count) as used, distributed, or monthly when not used or distributed and this inventory shall be documented on the Chemical Inventory Log (DRC1886). The Chemical Inventory Logs (DRC1886) shall indicate the quantity and location of where issued items are being used (e.g. chemical cart).

f. Any carts containing chemicals shall have an accurate list of all chemicals on the Chemical List Form (DRC1895). The Chemical List Form (DRC1895) shall be attached or maintained on the actual cart.

g. The sanitizing chemical products used for the employee fitness center shall be inventoried monthly by the Operation Support Center building management liaison. This inventory shall be documented on the Chemical Inventory Log (DRC1886).

h. Any chemical products found to be unaccounted for shall be immediately reported via Incident Report (DRC1000) to the OSC safety and health coordinator. These products shall be stored in a secure area/room when not in use.

E. Compliance Monitoring

The safety and health coordinator shall inspect each area having chemicals for compliance with this policy at least monthly in conjunction with the monthly fire/safety/sanitation inspections. The safety and health coordinator shall report violations of this policy to their respective supervisor, and the supervisor of the area inspected, by submitting a completed Fire/Safety/Sanitation Monthly Inspection Report (DRC1257).

Related Department Forms:

Incident Report	DRC1000
Incident Report Supplement	DRC1001
Fire/Safety/Sanitation Monthly Inspection Report	DRC1257
Chemical Approval form	DRC1885e
Chemical Inventory Log	DRC1886
Chemical List	DRC1895
Inmate Training Form	DRC1953