



## Hazardous Communication & Chemical Safety

Hazardous chemical exposure can cause or contribute to many serious health problems. Some chemicals may also be safety hazards and have the potential to cause fires, explosions, and other serious accidents. Exposure to chemicals poses a serious problem for employees and offenders. Chemicals are found in almost every work environment in TDCJ. There are precautions that should be taken when using or being exposed to chemicals in the workplace. Every effort should be made to limit the amount of hazardous chemicals in the workplace by only purchasing the necessary amounts of chemicals.



### TDCJ Hazard Communication Program (EA-05.09 Rev 5)

Texas Hazard Communication Act (HCA)

This Act applies to public employers over whom OSHA does not have jurisdiction, including the state (which includes all state agencies) and its political subdivisions, public schools, colleges and universities, river authorities and publicly owned utilities, and volunteer emergency service organizations.

The HCA provides employees access to information related to hazardous chemicals they may potentially be exposed to during operational hours. The central concept behind the Act is to delineate an employee's "right-to-know." State agencies are required to notify employees of the law and their rights, provide training as needed on the hazards and safe use of chemicals in their facility, provide appropriate protective equipment, make safety data sheets (SDS) readily available to employees, ensure that chemical containers are labeled, and prepare facility chemical lists.

If an accident should happen, and you or some one is exposed, call the **Poison Control Center (1-800-222-1222)**

If the hazardous material should get on your skin or hair, take off any contaminated clothing immediately, followed by rinsing the skin with water.



## TDCJ Safety Policy

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The Texas Department of Criminal Justice shall emphasize a safe environment for all employees and offenders. The TDCJ is committed to compliance with all applicable safety rules and regulations.

Employees shall follow all safety policies and procedures and report unsafe conditions, hazards, or acts as described in AD-10.20, "Identifying and Reporting Facility Maintenance Requirements," AD-10.63, "Operational Risk Assessment Program," and the TDCJ *Risk Management Program Manual*.

The deputy executive director shall ensure the agency provides a progressive safety program. The TDCJ risk manager is responsible for the development, implementation, and monitoring of the TDCJ Risk Management program.

## Safety Data Sheets

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1. A chemical manufacturer or distributor is required to provide the appropriate SDS with each initial shipment and with the first shipment after an update.
2. A current SDS must be included in the Hazard Communication Notebook for each chemical identified on the *Departmental Chemical Inventory List*. A Supervisor must not permit the use of any chemical for which a current SDS is not available. Documentation for a SDS request must be maintained in Section II of the department's hazard communication notebook until the SDS is received.
3. SDS must be readily available or accessible for review during the same work shift in which they are requested. A current SDS must be one which contains the most recent significant hazard information for the chemical as determined by the chemical's manufacturer.
4. When SDS are received, supervisors should review the incoming data sheets for significant safety and health information and for any special warnings for the product. Any pertinent hazard information should be made available via training and will be used when labeling containers of hazardous chemicals.



## Routes of Entry into the Body

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There are four main routes by which hazardous chemicals enter the body:

- ◆ Absorption through the respiratory tract via inhalation.
- ◆ Absorption through the skin via dermal contact.
- ◆ Absorption through the digestive tract via ingestion. (Ingestion can occur through eating or smoking with contaminated hands or in contaminated work areas.)
- ◆ Absorption through puncture wound (syringe needle or broken glass). This is possible but not a common route of exposure. However, needle sticks are significant routes of exposure in biomedical, health care and radiological work.

## Hazard Identification and Risk Assessment Reporting

Supervisors must report all employee and offender injuries involving a chemical identified on the *Departmental Chemical Inventory List* in accordance with Administrative Directive 02.15 *Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents* and *Risk Management Program Manual* guidelines.

Typically, hazards are identified through the AD-10.20 process on unit facilities. However, staff and offenders may report a hazard at any time to the risk management department. Unit Risk Managers (URM) shall have a method for accounting and tracking reported hazards to include:

A. Implement and maintain a hazard reporting system to include a log reflective of effective corrective action taken.

B. Ensure that a method of hazard reporting is available and easily accessible to all staff and offenders. This can include the use of Inter-Office Communications or I-60 Inmate Request to Official.

C. Ensure that all hazards reported by any means, other than through the AD-10.20 program, are reported to the URM. The URM shall document investigation results on a Hazard Report Log and forward to the responsible department head with the Recommended Corrective Action (RCA) form. If appropriate, provide person reporting the hazard (unless it was done anonymously) with a copy of any completed reporting form or an IOC summarizing investigation results and recommendations.

D. Ensure that once a reported hazard has been investigated, a copy of the Hazard Report form is kept on file and monitored until corrective action has been completed and documented.

E. Keep Unit Warden/Facility Administrator advised on any assistance needed to correct and/or control hazards.



## Self Evaluation

Each department should evaluate their areas and identify all chemicals within their department and ask a few simple questions to determine if chemical safety is being followed:

- ◆ Is the chemical needed?
- ◆ Is there a safe alternative?
- ◆ Are Safety Data Sheets (SDS) available?
- ◆ Are affected employees and offenders trained on the hazards associated with such chemicals and their use to include PPE?
- ◆ Are all containers labeled as to their contents and appropriate hazards as stated on the SDS?
- ◆ Are chemicals being stored in accordance with the requirements based on the information found on the SDS or as directed by policy?
- ◆ Is there appropriate personal protective equipment available and is its use being enforced?

## Personal Protective Equipment

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- ◆ Understanding how hazardous chemicals enter the body is crucial in the selection of Personal Protective Equipment (PPE).
  - ◆ Division level department heads shall identify and designate, in writing in the appropriate operations manuals, all areas of an operation that require the use of PPE.
    - ◆ Supervisors of involved areas shall ensure that appropriate PPE is available, used, and maintained in a sanitary and reliable condition. Department heads shall inventory and inspect PPE on a weekly basis and document results on the Department Weekly Inspection and PPE Inventory Report form located in RM-13, “Inspections, Audits, and Reviews”. Department heads shall forward the record to the Risk Management department.
    - ◆ PPE furnished by the Texas Department of Criminal Justice (TDCJ) must meet all standards and maintenance requirements as specified by agency policy and manufacture recommendations.
    - ◆ Supervisors of all areas or operations where PPE is required shall post PPE requirements in such a way that all personnel entering the area are alerted.
    - ◆ Supervisors of all areas or operations requiring the use of PPE are responsible for enforcing PPE compliance, to include PPE signage requirements.
    - ◆ Additional information regarding PPE can be found in RM-42
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### Training Circular TDCJ Risk Management Department

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The Training Circular, a publication of the Texas Department of Criminal Justice Risk Management Department, is published monthly in an effort to promote and enhance risk management awareness on issues relating to TDCJ employees. Design and layout of the Training Circular is preformed by Cliff Prestwood, Risk Management. Comments, suggestions and safety related items are welcome.

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**References:** ◆ ED-05.09 (rev. 5) ◆ ED-10.61 ◆ RM-10 ◆ RM-42 ◆ OSHA

## HCS Pictograms and Hazards

<p>Health Hazard</p>  <ul style="list-style-type: none"> <li>* Carcinogen</li> <li>* Mutagenicity</li> <li>* Reproductive Toxicity</li> <li>* Respiratory Sensitizer</li> <li>* Target Organ Toxicity</li> <li>* Aspiration Toxicity</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Concrete dust</li> <li>* Asbestos</li> </ul>	<p>Flame</p>  <ul style="list-style-type: none"> <li>* Flammables</li> <li>* Pyrophorics</li> <li>* Self-Heating</li> <li>* Emits Flammable Gas</li> <li>* Self-Reactives</li> <li>* Organic Peroxides</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Paint thinner</li> <li>* Gasoline</li> <li>* WD-40</li> </ul>	<p>Gas Cylinder</p>  <ul style="list-style-type: none"> <li>* Gases Under Pressure</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Oxygen</li> <li>* Acetylene</li> <li>* Aerosol Spray</li> </ul>	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> <li>* Irritant (skin and eye)</li> <li>* Skin Sensitizer</li> <li>* Acute Toxicity (harmful)</li> <li>* Narcotic Effects</li> <li>* Respiratory Tract Irritant</li> <li>* Hazardous to Ozone Layer (Non-Mandatory)</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Crystal clean</li> <li>* Dishwashing compound</li> </ul>
<p>Exploding Bomb</p>  <ul style="list-style-type: none"> <li>* Explosives</li> <li>* Self-Reactives</li> <li>* Organic Peroxides</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Acetylene</li> <li>* Oxygen</li> <li>* Fertilizers</li> </ul>	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> <li>* Aquatic Toxicity</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Lysol</li> <li>* Double D</li> </ul>	<p>Flame Over Circle</p>  <ul style="list-style-type: none"> <li>* Oxidizers</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Hydrogen Peroxide</li> <li>* Chlorine</li> </ul>	<p>Corrosion</p>  <ul style="list-style-type: none"> <li>* Skin Corrosion/Burns</li> <li>* Eye Damage</li> <li>* Corrosive to Metals</li> </ul> <p>Examples:</p> <ul style="list-style-type: none"> <li>* Comet cleaner</li> <li>* Sulfuric Acid</li> <li>* Batteries</li> <li>* Bibby/Double D</li> </ul>
 <p>Skull and Crossbones</p> <ul style="list-style-type: none"> <li>* Acute Toxicity (fatal or toxic)</li> </ul>		<p>Examples:</p> <ul style="list-style-type: none"> <li>* Lead (ammunition)</li> <li>* Mercury (thermometer)</li> </ul>	