HAZARD COMMUNICATION AND CHEMICAL MANAGEMENT

1. REASON FOR ISSUE: This directive states policy to ensure that the Veterans Health Administration (VHA) stores, handles, uses and disposes of hazardous chemicals in a manner consistent with applicable regulatory, statutory and accreditation requirements, as well as accepted safe practices. This directive also states policy for evaluation, reporting and oversight requirements.

2. SUMMARY OF MAJOR CHANGES: This directive updates responsibilities and oversight of Hazard Communication and Chemical Management Programs. Major changes include:

a. Clarifies the scope and applicability of the directive in paragraph 2.

b. Adds new definitions in paragraph 3 and training information in paragraph 6.

c. Updates and aligns program office responsibilities in paragraph 5 to the 2020 changes in the VHA Central Office Organization Chart and to the Occupational Safety and Health Administration's (OSHA) updated Hazard Communication Standard at 29 C.F.R. § 1910.1200. The OSHA standard incorporated the world's Global Harmonized System.

d. Adds roles and responsibilities to the VHA Consolidated Mail Outpatient Pharmacy Associate Deputy Chief Consultant; Director, Enterprise Support Service; Department of Veterans Affairs (VA) medical facility Occupational Safety and Health (OSH) Manager; VA medical facility Work Area Supervisors; and VA medical facility employees in paragraph 5.

e. Removes language redundant to VA Directive 0059, VA Chemicals Management and Pollution Prevention, dated May 25, 2012, and incorporates responsibilities previously assigned to the VA medical facility Hazardous Chemicals Management Program Coordinator under the VA medical facility OSH Manager and Work Area Supervisors in paragraph 5.

f. Relocates previous Appendix A (Minimum Criteria for Evaluating Hazardous Chemicals Management Programs during Annual Workplace Evaluations) to the VHA Healthcare Environment and Facilities Programs Industrial Hygiene (IH) Guidebook located at http://vaww.hefp.va.gov/guidebooks/industrial-hygiene-guidebook-0 (refer to "VHA AWE Checklist Guide HAZCOM OSHA 1910.1200" under Chapter 10 References and Resources). ***NOTE:*** *This is an internal VA website that is not available to the public.*

3. RELATED ISSUES: VA Directive 0057, VA Environmental Management Program, dated January 15, 2010; VA Directive 0059; VA Directive 7700, Occupational Safety and Health, dated February 11, 2009; VHA Directive 1200.08(1), Safety of Personnel

and Security of Laboratories Involved in VA Research, dated April 24, 2019; VHA Directive 7701, Comprehensive Occupational Safety and Health Program, dated May 5, 2017; VHA Directive 7702, Industrial Hygiene Program and Exposure Assessment Process, dated July 29, 2021; and VHA Directive 7707, VHA Green Environmental Management System Program and Governing Environmental Policy Statement, dated April 1, 2021.

4. RESPONSIBLE OFFICE: The Assistant Under Secretary for Health for Support (19) is responsible for the content of this directive. Questions may be addressed to the Director, Office of Occupational Safety and Health (19HEF) at VHAOccSafetyandHealthAction@va.gov.

5. RESCISSIONS: VHA Directive 7705, Management of Hazardous Chemicals, dated August 14, 2015; and VHA Memorandum 2015-02-04, VHA Enterprise Solution for Safety Data Sheet/Chemical Inventory Management, dated February 11, 2015, are rescinded.

6. RECERTIFICATION: This VHA directive is due to be recertified on or before the last working day of May 2027. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

BY DIRECTION OF THE OFFICE OF THE UNDER SECRETARY FOR HEALTH:

/s/ Deborah E. Kramer
Acting Assistant Under Secretary for Health for Support

NOTE: *All references herein to VA and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.*

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HAZARD COMMUNICATION AND CHEMICAL MANAGEMENT

1. PURPOSE

This directive states policy to ensure that the Veterans Health Administration (VHA) purchases, stores, handles, uses and disposes of hazardous chemicals in a manner consistent with applicable regulatory, statutory and accreditation requirements, as well as accepted safe practices. This directive states the requirements for an effective VHA Hazard Communication and Chemical Management Program for those workplaces that have workers that handle or use hazardous chemicals. This directive also states policy for evaluation, reporting and oversight requirements. **AUTHORITY:** 38 U.S.C. § 7301(b); 29 C.F.R. § 1910.1200.

2. BACKGROUND

a. This directive applies to:

(1) All employees who work in an environment where hazardous chemicals are known to be present and where employees may be exposed under normal conditions of use or in a foreseeable emergency. ***NOTE:*** *See 29 C.F.R. § 1910.1200(b)(3) and its subparagraphs for how this directive applies to laboratories (e.g., clinical or research). Laboratories must comply with 29 C.F.R. § 1910.1450 if applicable.*

(2) All personnel who handle, use or may potentially be exposed to hazardous chemicals while working under a contractor or working in contractor facilities. VHA retains ultimate responsibility for personnel participation and oversight.

(3) Contractor employees who are employed by the Department of Veterans Affairs (VA) that may be exposed to hazardous chemicals during a VHA operation with the following exceptions:

(a) This directive does not excuse contractors, as stipulated in their specific contracts, from their compliance obligations under 29 C.F.R. § 1910.1200 or any applicable State and local requirements.

(b) Contractors are required to train their own employees in accordance with 29 C.F.R. § 1910.1200 and any applicable State and local requirements. Contractors are not authorized to use the VHA Hazard Communication and Chemical Management Program for this purpose.

b. VHA must comply with Federal Occupational Safety and Health Administration (OSHA) regulations such as 29 C.F.R. § 1910.1200 even if the State in which the VHA installation is located has an OSHA-approved State program.

3. DEFINITIONS

a. **Hazardous Chemical.** A hazardous chemical is defined by 29 C.F.R. § 1910.1200 as any chemical which is classified as a physical hazard or a health hazard,

a simple asphyxiant, combustible dust, pyrophoric gas or hazard not otherwise classified.

b. **Safety Data Sheet.** The Safety Data Sheet (SDS), formerly known as Material Safety Data Sheet, is a document containing information on hazardous materials from the manufacturer to the employer and user. An SDS includes information such as: product and manufacturer identification, hazard(s) identification, composition/information on ingredients, first-aid measures, fire-fighting measures, accidental release measures, handling and storage, exposure controls/personal protection, physical and chemical properties, stability and reactivity, toxicological information, ecological information, disposal considerations, transport information and regulatory information. SDS requirements are established by 29 C.F.R. § 1910.1200(g), Hazard Communication Standard. ***NOTE:*** *Refer to 29 C.F.R. § 1910.1200 for other related definitions.*

4. POLICY

It is VHA policy that each VA medical facility must maintain a Hazard Communication and Chemical Management Program that provides for the safe purchasing, storage, handling, use, disposal and reduction of hazardous chemicals and wastes to protect the safety of Veterans, visitors and employees. It is VHA policy that employees must be provided information about the specific hazardous chemicals to which they may be exposed.

5. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Assistant Under Secretary for Health for Operations.** The Assistant Under Secretary for Health for Operations is responsible for:

(1) Communicating the contents of this directive to each of the Veterans Integrated Services Network (VISNs).

(2) Assisting VISN Directors to resolve implementation and compliance challenges in all VA medical facilities within that VISN.

(3) Providing oversight of VISNs to ensure compliance with this directive and its effectiveness.

c. **Assistant Under Secretary for Health for Support.** The Assistant Under Secretary for Health for Support is responsible for establishing policy and providing guidance and oversight as necessary to ensure the timely and successful implementation of this directive.

d. **Executive Director, Office of Healthcare Environment and Facilities Programs.** The Executive Director, Office of Healthcare Environment and Facilities

Programs (HEFP), is responsible for:

(1) Overseeing VHA Hazard Communication and Chemical Management Program.

(2) Periodically assessing the Hazard Communication and Chemical Management Program and system for continued need, currency and effectiveness.

(3) Coordinating with the Assistant Under Secretary for Health for Operations, VISN Directors and VA medical facility Directors to ensure all necessary action is taken and funding is obtained to address Hazard Communication and Chemical Management Program, performance in a manner that meets the requirements of Federal, State and local statutes and regulations; applicable Executive Orders; and VA and VHA directives.

(4) Ensuring that resources are adequate to maintain the Hazard Communication and Chemical Management Program, including the VHA SDS/Chemical Inventory Service (CIS).

e. **VHA Consolidated Mail Outpatient Pharmacy Associate Deputy Chief Consultant.** The VHA Consolidated Mail Outpatient Pharmacy (CMOP) Associate Deputy Chief Consultant is responsible for:

(1) Developing, implementing and managing Hazard Communication and Chemical Management Programs at CMOP facilities.

(2) Ensuring that CMOPs comply with applicable Federal, State and local environmental regulations, Executive Orders, VA and VHA policies.

(3) Providing information and reports related to Hazard Communication and Chemical Management Programs to the Assistant Under Secretary for Health for Operations for the Office of Occupational Safety and Health (OSH) upon request.

f. **Director, Enterprise Support Service.** The Director, Enterprise Support Service (ESS), is responsible for:

(1) Publishing and updating the VHA Industrial Hygiene (IH) Guidebook, available at: http://vaww.hefp.va.gov/guidebooks/industrial-hygiene-guidebook-0 and VHA Safety Data Sheet (SDS)/Chemical Inventory Service Guidebook, available at: http://vaww.hefp.va.gov/guidebooks/safety-data-sheetchemical-inventory-guidebook. ***NOTE:*** *These are internal VA websites that are not available to the public.*

(2) Managing the VHA SDS/CIS to support VISN and VA medical facility compliance with the referenced SDS and chemical inventory requirements. More information on the VHA SDS/CIS can be found at: http://vaww.hefp.va.gov/occupational-safety-health-gems/safety-data-sheetchemical-inventory-service. ***NOTE:*** *This is an internal VA website that is not available to the public.*

(3) Advising VISN and VA medical facility employees on matters involving effective and efficient use of the VHA SDS/CIS.

(4) Reviewing SDSs submitted by VA medical facility Work Area Supervisors and chemical manufacturers for completeness and legibility and requesting additional information to correct SDS deficiencies; consulting with VA medical facility OSH staff, as necessary.

(5) In collaboration with HEFP, developing and maintaining VA Talent Management System (TMS) Courses (see paragraph 6), workplace specific training guidance (modifiable to supplement local training and be workplace specific) and other training templates to support areas similar to OSHA expanded standards. ***NOTE:*** *For further information on training, see paragraph 6.*

(6) Developing, producing and publishing chemical inventory reports that support VHA, VISN and VA medical facility compliance requirements or hazard assessments.

g. **Director, Office of Occupational Safety and Health.** The Director, OSH is responsible for:

(1) Supporting the implementation and oversight of this directive across VHA.

(2) Ensuring funding is provided to support OSH staff and hazard communication and chemical management projects at the VISN and VA medical facility level.

(3) Advising VA and VHA senior officials on matters involving Hazard Communication and Chemical Management program management.

(4) Providing guidance, administrative management and technical support to VA medical facility Hazard Communication and Chemical Management Programs, using results from the Annual Workplace Evaluations (AWEs). ***NOTE:*** *Hazard Communication and Chemical Management Programs are evaluated as part of the AWE required by VHA Directive 7701, Comprehensive Occupational Safety and Health Program, dated May 5, 2017, to include the criteria in the "VHA AWE Checklist Guide HAZCOM OSHA 1910.1200" located at http://vaww.hefp.va.gov/resources/awe-process-guide and other evaluation and program guidance described in Chapter 10 (Hazard Communication) of the IH Guidebook located at http://vaww.hefp.va.gov/guidebooks/industrial-hygiene-guidebook-0. These are internal VA websites that are not available to the public.*

(5) Reviewing the results of the VISN AWE of the VA medical facilities' Hazard Communication and Chemical Management Programs for compliance with 29 C.F.R. § 1910.1200 and this directive.

(6) Developing national guidelines for training on hazardous chemical handling, storage and disposal and collaborating with the Director, ESS, to develop training requirements, to include hazard assessment, protective equipment, injury prevention and spill response. See paragraph 6. ***NOTE:*** *The national guidelines for hazardous chemical training are located in the IH Guidebook at http://vaww.hefp.va.gov/guidebooks/industrial-hygiene-guidebook-0. This is an internal VA website that is not available to the public.*

(7) Evaluating internal or external compliance inspection reports and analyzing field data to determine whether any programmatic changes are required through training or other process improvement projects.

(8) Recommending to the Assistant Under Secretary for Health for Support appropriate actions to improve Hazard Communication and Hazardous Chemical Management Programs.

h. **Veterans Integrated Services Networks Director.** Each VISN Director is responsible for:

(1) Ensuring that all VA medical facilities within the VISN comply with this directive and informing leadership when barriers to compliance are identified.

(2) Providing adequate resources for the implementation of this directive within the VA medical facilities of their jurisdiction.

(3) Assigning VISN or VA medical facility employees to evaluate Hazard Communication and Chemical Management Programs during VA medical facility AWEs.

(4) Assigning VISN or VA medical facility employees to provide support, including AWEs, at applicable VHA offices located within the VISN but outside of the administrative authority of the VISN Director, in accordance with VHA Directive 7701. These VHA offices include but are not limited to VHA research facilities and CMOPs.

(5) Providing program guidance, resolving questions and providing interpretation of VHA Hazard Communication and Chemical Management Program requirements for their VA medical facilities.

i. **VA Medical Facility Director.** ***NOTE:*** *For purposes of this directive, VA medical facility Director includes the Facility Director for VHA research facilities and the CMOP Director.* The VA medical facility Director is responsible for:

(1) Ensuring that the VA medical facility Hazard Communication and Chemical Management Program is implemented. ***NOTE:*** *The office assigned by the VA medical facility Director for implementing this directive varies by VA medical facility due to site-specific staffing.*

(2) Providing a safe and healthy work environment and ensuring all assigned employees are familiar with the hazards within the workplace, understand appropriate ways to manage risks associated with hazardous chemicals in the workplace, and are provided with the resources needed to comply with this directive.

(3) Ensuring supervisors and employees who handle, use or are potentially exposed to hazardous chemicals in the course of official duties are provided information and training on the VA medical facility Hazard Communication and Chemical Management Program and the specific hazards in their workplaces at the time of initial assignment

and when a new hazard is introduced according to 29 C.F.R. § 1910.1200(h). ***NOTE:*** *For further information on training requirements, see paragraph 6.*

j. **VA Medical Facility Occupational Safety and Health Manager.** The VA medical facility OSH Manager is responsible for:

(1) Identifying service line workplaces through the IH exposure assessment process that require hazard communication training and providing the list of responsible managers to the local TMS Administrator for training assignments (see paragraph 6).

(2) Providing clarification, as requested, to VA medical facility Work Area Supervisors on potential health hazards, training requirements and regulatory requirements associated with hazardous chemicals and the VA medical facility Hazard Communication and Chemical Management Program.

(3) Coordinating with VA medical facility Work Area Supervisors to update their hazardous chemical inventory and assisting with updates in the VHA SDS/CIS.

(4) Assessing service line workplace compliance with Federal requirements and this directive in conjunction with routine IH exposure assessments when deemed necessary. ***NOTE:*** *For more information on the exposure assessment process see VHA Directive 7702, Industrial Hygiene Program and Exposure Assessment Process, dated July 29, 2021.*

(5) Providing hazard communication advice to the VA medical facility Contracting Office, upon request, to assist in ensuring contracts include hazardous chemical identification and data requirements as appropriate.

k. **VA Medical Facility Work Area Supervisors.** The VA medical facility Work Area Supervisors or employees delegated by the VA medical facility Work Area Supervisors, are responsible for implementing the elements of the VHA Hazard Communication and Chemical Management Program, as appropriate to their service lines, as follows:

(1) Developing and maintaining their service line hazardous chemical inventory.

(2) Obtaining new SDSs, submitting updates to existing SDSs or requesting assistance to obtain unavailable SDSs through the SDS portal for inclusion in the VHA SDS/CIS. ***NOTE:*** *The SDS portal is located at https://apps.gov.powerapps.us/play/e/default-e95f1b23-abaf-45ee-821d-b7ab251ab3bf/a/d8535117-2c89-4328-94ad-f873b0d68ead?tenantId=e95f1b23-abaf-45ee-821d-b7ab251ab3bf&hint=3731ca81-e92b-4a6a-a9d0-3efcaae365d1&sourcetime=1756326035108. This is an internal VA website that is not available to the public. VA medical facility Work Area Supervisors may delegate the SDS administration role, but still retain overall responsibility for chemical inventory management as part of the Hazard Communication and Chemical Management Program.* See paragraph 5.f. for related responsibilities of the Director, ESS.

(3) Ensuring that hazardous chemical information and labels are accessible by all employees in the workplace.

(4) Ensuring all hazardous chemicals are properly labeled prior to storage and issue. ***NOTE:*** *Labels can also be printed using the VHA SDS/CIS; instructions are also available in the VHA SDS/CIS Guidebook at: http://vaww.hefp.va.gov/guidebooks/safety-data-sheetchemical-inventory-guidebook. Additional labeling is not required if the manufacturer label is already compliant with requirements in 29 C.F.R. § 1910.1200(f). This is an internal VA website that is not available to the public.*

(5) Ensuring that assigned employees receive and understand workplace-specific Hazard Communication and Chemical Management training (see paragraph 6.a. and 6.b.) and documenting completion of training.

(6) Notifying service line visitors (including contractors and employees from other service lines) of operational hazards and protective measures, where and how relevant SDS information is available, and information on the hazardous chemical labeling system.

(7) Considering substitution of hazardous chemicals for less toxic or hazardous chemicals in tasks and processes when making chemical purchases. ***NOTE:*** *Refer to VHA Directive 7707, VHA Green Environmental Management System Program and Governing Environmental Policy Statement, dated April 1, 2021.*

l. **VA Medical Facility Employees.** VA medical facility employees are responsible for:

(1) Completing appropriate training as directed by VA medical facility Work Area Supervisors.

(2) Knowing the location of hazardous chemicals and related information in their workplace.

(3) Safely purchasing, storing, handling, using, disposing of and reducing hazardous chemicals and wastes, as applicable, in accordance with the VA medical facility Hazard Communication and Chemical Management Program and workplace-specific processes.

6. TRAINING

a. VA medical facilities must provide employees with effective information and training on hazardous chemicals in their workplace at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their workplace. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and SDSs.

b. Employee training elements must include:

(1) Any operations in their workplace where hazardous chemicals are present;

(2) The location and availability of hazard communication and chemical management information, including the required list(s) of hazardous chemicals and SDSs;

(3) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the workplace (e.g., monitoring conducted by the VA medical facility, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released);

(4) Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the workplace;

(5) Measures employees can take to protect themselves from these hazards, including specific procedures the VA medical facility has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures (such as spills) and personal protective equipment to be used; and

(6) Explanation of the labels received on shipped containers of chemicals, the workplace labeling system used by the VA medical facility and SDSs, including the order of information in an SDS and how employees can obtain and use the appropriate hazard information.

c. The following training may be used as resources to develop the employee training for employees identified by the VA medical facility OSH Manager as requiring hazard communication training in accordance with 29 C.F.R. 1910.1200(h). See TMS Course 19273 (Global Harmonization System (GHS) Information), TMS Course 17049 (Global Harmonization System (GHS) Hazardous Materials Labels Item Details) and TMS Course 17047 (Global Harmonization System (GHS) Hazard Communication and Chemical Safety Item Details). These courses are also posted on the SDS/CIS website at https://apps.gov.powerapps.us/play/e/default-e95f1b23-abaf-45ee-821d-b7ab251ab3bf/a/d8535117-2c89-4328-94ad-f873b0d68ead?tenantId=e95f1b23-abaf-45ee-821d-b7ab251ab3bf&hint=3731ca81-e92b-4a6a-a9d0-3efcaae365d1&sourcetime=1756326035108. ***NOTE:*** *This is an internal VA website that is not available to the public.*

d. The following training is ***required*** for individuals delegated as chemical inventory administrators: TMS Course 29466 (VHA SDS/Chemical Inventory Service Advanced Administrators Training).

e. The following training is ***recommended*** for all employees to be knowledgeable on how to easily access SDSs or labels: TMS Course 24665 (Basic User Training).

7. RECORDS MANAGEMENT

All records regardless of format (e.g., paper, electronic, electronic systems) created by this directive must be managed as required by the National Archives and Records Administration (NARA) approved records schedules found in VHA Records Control Schedule 10-1. Questions regarding any aspect of records management should be

addressed to the appropriate Records Officer.

8. REFERENCES

a. 38 U.S.C. § 7301(b).

b. 29 C.F.R. §§ 1910.1200; 1910.1450.

c. VHA Directive 7701, Comprehensive Occupational Safety and Health Program, dated May 5, 2017.

d. VHA Directive 7702, Industrial Hygiene Program and Exposure Assessment Process, dated July 29, 2021.

e. VHA Directive 7707, VHA Green Environmental Management System Program and Governing Environmental Policy Statement, dated April 1, 2021.

f. VHA HEFP Industrial Hygiene Guidebook. http://vaww.hefp.va.gov/guidebooks/industrial-hygiene-guidebook-0. ***NOTE:*** *This is an internal VA website that is not available to the public.*

g. VHA Safety Data Sheet (SDS)/Chemical Inventory Service Guidebook. http://vaww.hefp.va.gov/guidebooks/safety-data-sheetchemical-inventory-guidebook. ***NOTE:*** *This is an internal VA website that is not available to the public.*