

HEADS UP...

TOPIC: Managing risks related to hazardous materials and waste

SETTING: Nursing Care Center (NCC) Program

Why is this important?

Nursing Care Centers use cleaning products, solvents, compressed gases and other hazardous materials. It is essential that these types of hazardous materials and waste are properly identified and managed to mitigate the risks associated with the handling, storing, transporting, using and disposing of them. The proper selection, handling, storage, transport, use and disposal of hazardous chemicals topic continues to be a high-risk safety issue in NCCs and often appears on the list of frequently scored standards.

Scope of the Problem:

Time period: **July 1, 2020 through May 13, 2021**

Number of full surveys performed: **239**

Number of surveys with moderate to high risk findings for EC.02.02.01 EP 5: **33 (14%)**

Relevant standard/EP: EC.02.02.01. The organization manages risks related to hazardous materials and waste. **EP 5.** The organization minimizes risks associated with selecting, handling, storing, transporting, using, and disposing of hazardous chemicals.

Sample survey observations [from surveyor notes] and contributing factors

Sample observations:

- No eyewash stations accessible around hazardous chemicals (e.g., located behind a locked door)
- Corrosive chemicals with no plumbed eyewash station
- Eyewash station was not plumbed, required two hands to turn on the water faucets and to pull a knob to activate the flush
- Chemicals with pH less than 2.0 or above 11.5 in use with no eyewash station present
- Eyewash stations only being checked monthly
- Chemicals were in unsecured containers (e.g., no tops)
- Personal protective equipment was not used in the handling of hazardous chemicals

Potential contributing factors:

- Leadership failed to ensure employees were following proper procedure for handling hazardous materials and only using chemicals from labeled bottles.
- Leadership and staff were unaware of the requirement to meet safety compliance.
- Leadership had failed to identify the potential risk associated with not having eyewash stations installed.
- Leadership had failed to educate personnel regarding availability and use of Safety Data Sheets

How to identify potential problems in your organization

Review your policies and procedures

- Does the NCC have policies and procedures on hazardous material management?
- What federal, state, or local regulations control how the NCC stores, labels, and handles hazardous materials and waste?
- Does the NCC have a procedure for maintaining eyewash stations? Who is responsible for testing and maintaining eyewash stations?

Interview staff



- Do personnel in the NCC know what to do when they see this sign on a bottle containing cleaning products?
- Has staff received training on hazardous materials and waste (e.g., use, handling, storing, risks, etc.)? Has staff received training on responding to an incident involving hazardous materials or waste?
- Has staff received training specific to the use of eyewash stations? Can personnel tell you where eyewash stations are located?
- Can personnel responsible for checking eyewash stations describe the process they use to check the eyewash stations? Can they explain the rationale for checking the eyewash station?

Assess your environment

- How does the organization secure hazardous materials? Where does the organization store hazardous materials for use? How does the organization label containers of hazardous materials? How does the organization label containers of cleaning products with hazardous materials?
- Does the organization have eyewash stations? If so, where are the stations located? Are they accessible and easy to operate? Are the eyewash stations plumbed? If they are not plumbed, are they adequate? (i.e., allow a sufficient amount of continuous flushing)
- Are the eyewash stations appropriate for the type of hazardous materials being used in the area?
- How are eyewash stations tested? What steps are taken when eyewash stations are not functioning properly? How often are eyewash stations tested? Is there a log for tracking the tests?
- Are safety data sheets (SDS) available for these materials? How are the SDS accessed?

Evaluate implementation

- What kind of data does the organization collect on hazardous materials and waste use? What kind of documentation does the organization maintain in relation to hazardous waste and materials management? Are there monitoring logs or checklists used for audits?
- How are incidents involving hazardous materials or waste reported and tracked?
- Are audits performed that look at the management of hazardous materials and waste?
- Is staff training documented?

What are some resources can assist me in mitigating risks in these areas?

- Joint Commission FAQs. [Eye Wash Station and Emergency Showers - Design Criteria](#). March 29, 2021.
- Occupational Safety and Health Administration (OSHA). Standards interpretation. [https://www.osha.gov/laws-regs/interlinking/standards/1910.151\(c\)/standard_interpretations](https://www.osha.gov/laws-regs/interlinking/standards/1910.151(c)/standard_interpretations) (See [06/01/2009 - 1910.151\(c\) - Requirements for eyewash and shower facilities](#)).
- Occupational Safety and Health Administration (OSHA). [1910.151-Medical services and first aid](#).
- Occupational Safety and Health Administration (OSHA). [Occupational Hazards in Long Term Care Nursing Home eTool](#) (see [Laundry](#) and [Housekeeping](#) sections).