

2014 INDUSTRIAL HYGIENE SURVEY
NEX MONTEREY, NAVY LODGE

References: (a) OPNAVINST 5100.23G
(b) COMNAVREGSWINST 113201D, paragraph 0119
(f) 29 CFR 1910.1030(c)(1)(i) and (ii)
(g) 29 CFR 1910.1030(c)(1)(iv)
(h) 29 CFR 1910.1030(g)(2)(vii)

HAZARDOUS MATERIAL CONTROL AND MANAGEMENT PROGRAM:

FINDING 66288-14-1: The Navy Lodge lacks hazardous materials authorized use and inventory lists. The Navy Lodge Manager indicated during an outbrief with the Industrial Hygienist for the previous survey that the inventory list using the format specified by the NEX Safety Manager at that time was being initiated, but there was no evidence that ever occurred.

RECOMMENDATION 66288-14-1: As required by reference (a), Chapter 7, paragraphs 0702g(2) and (4), an authorized use list (AUL) and an inventory list for hazardous materials need to be developed. The AUL needs to include the stock number and item name (for items purchased through the stock system) or the product name and manufacturer name as they appear on the product label/Safety Data Sheet (SDS) as well as identify the process(es) involved for each HM listed and indicate the quantity stored. Each hazardous material needs to be uniquely identified for cross-referencing between the product's container label, SDS, AUL, and inventory list.

FINDING 66288-14-2: Except for the products used by the Housekeepers, the Navy Lodge lacks SDSs for the majority of its hazardous materials authorized use and inventory lists. As with the inventory list, the Navy Lodge Manager indicated during an outbrief with the Industrial Hygienist during the previous survey that missing SDS's were being procured, but there is no evidence that ever occurred.

RECOMMENDATION 66288-14-2: As required by reference (a), Chapter 7, paragraph 0702g(6), SDS's need to be procured and kept on hand for all hazardous materials stored or used.

HAZARDOUS MATERIAL CONTROL AND MANAGEMENT PROGRAM: (continued)

FINDING 66288-14-3: The Navy Lodge Maintenance Worker who served as the survey point of contact indicates that several chemical products, such as 70% isopropyl alcohol, not present during the previous survey are actually customer items discarded into the dumpster and retrieved/stored by the other Maintenance Worker for possible future use. As such, these materials are not accounted for on the AUL or inventory list, SDS's are not available for these products, and required hazardous materials training may not include the category of chemicals these products are included in.

RECOMMENDATION 66288-14-3: Ensure all hazardous materials program requirements as outlined in reference (a), Chapter 7 are followed for these products.

Hazardous materials used by the Navy Lodge Maintenance Workers are kept in either the second floor Maintenance Work Room or outside storage shed. The Industrial Hygienist was unable to conduct a full exposure assessment for any new products since the previous survey since:

- it is unknown whether or not any of the products mentioned in Finding/Recommendation 66288-14-3 above are to be used or not
- Hazardous materials in the second floor workroom were randomly stored through the room among a great deal of workspace clutter
- the outside shed's flammable storage locker was inaccessible because of storage of lawn maintenance equipment, a trash can, and a wheel barrow in front of it that presented a storage issue due to the potential for this material falling on anyone moving it.

FINDING 66288-14-4: Several products were found stored on top of rather than inside the Navy Lodge outside storage shed's flammable storage locker. At least two of these products, containers of purple PVC cement primer and PVC cement, are flammable liquids, and require storage inside a flammable storage locker when not in use.

RECOMMENDATION 66288-14-4: Ensure all flammable materials are stored inside a flammable storage locker when not being use as required by reference (b).

BLOODBORNE PATHOGENS PROGRAM: Potential exposure to bloodborne pathogens can occur where Navy Lodge housekeepers are changing linen, handling towels and linen, or when emptying trash cans containing products contaminated with possible blood or body fluids. Reference (f) requires each work area with potential exposure to bloodborne pathogens to have an Exposure Control Plan (ECP) developed and implemented. This program is necessary at the Navy Lodge because of the Housekeeper's potential encounter with materials contaminated with blood or body fluids during performance of their duties. The Navy Lodge uses NEXCOMINST 5100.23A (issued 13 April 2011) as its ECP.

FINDING 66288-14-X: There is no evidence to support that the annual administrative reviews of this ECP by the Navy Lodge as required by reference (g) occurred since the previous survey (the due dates were on or before 13 April 2012 and 2013) as indicated in the previous survey report. Such reviews need to address if the ECP needs to be updated or if no changes are needed, and be properly documented and readily available for verification during future surveys/inspections.

RECOMMENDATION 66288-14-X: Ensure that this annual review occurs and is properly documented.

Most, if not all, of the housekeepers do not speak, read, or comprehend English as it is not their primary language. **The ECP does not necessarily need to be translated into their native language(s), but someone capable of translating the document for them must be available if any of the Housekeepers desire to review it.** As a courtesy, the Industrial Hygienist forwarded a Spanish version of the Federal OSHA Bloodborne Pathogens Standard to the Navy Lodge Manager during the 2007 industrial hygiene survey for future reference.

The Navy Lodge Housekeepers receive the basics of required annual bloodborne pathogens training by viewing a Spanish language videotape or an English version on DVD. The last formal training class was conducted by the training class conducted by the Naval Hospital, Lemoore Occupational Health Nurse which occurred in March 2011.

BLOODBORNE PATHOGENS PROGRAM (continued):

FINDING 66288-14-X: The videotape/DVD training for Navy Lodge Housekeepers described above does not fully meet the bloodborne pathogens training requirements outlined in reference (h) since it does not address control procedures specific to the Housekeepers' activities and does not include a discussion of the ECP (NEXCOMINST 5100.23A).

RECOMMENDATION 66288-14-x: Ensure that supplemental training that addresses the specifics of the Navy Lodge's program is annually conducted and documented as required by reference (g). Documentation needs to include completion of the videotape/DVD training as discussed above.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

FINDING 66288-14-X: A pair of ear muffs hanging on a hook in the Navy Lodge's second floor Maintenance Work Room were excessively dirty and dusty. Reference (a), Chapter 20, paragraph 2012a(5) requires the proper care and storage of PPE.

RECOMMENDATION 66288-14-X: The ear muffs need to be stored in a separate cabinet or sealable plastic bag to avoid early aging and deterioration due to excessive buildup of dirt/dust.