C-5. Employee Right-To-Know: Non-Laboratory Operations

I. Purpose

This chapter comprises NCI-Frederick Hazard Communication Program in accordance with Occupational Safety and Health Agency (OSHA) 1910.1200. This program ensures that accurate and consistent information is available on hazardous chemicals; that employees are made aware of the hazardous chemicals with which they work; and that training is provided in procedures and practices necessary to control exposures to hazardous chemicals. The program applies to hazardous chemicals to which employees may be exposed under normal conditions or in a foreseeable emergency.

II. Scope

This program applies to all elements of the NCI-Frederick that are not laboratory operations. Employee right-to-know elements for laboratory operations are addressed within the NCI-Frederick Chemical Hygiene Plan (refer to section C-1 “Chemical Hygiene Plan”.) Thus, this program includes, but is not necessarily limited to, the following production and service elements of NCI-Frederick: Facilities Maintenance and Engineering (FME), non-laboratory activities within the Lab Animal Science Programs (LASP), non-laboratory activities within the Biopharmaceutical Development Program (BDP), non-laboratory activities within the Vaccine Pilot Plant (VPP), IT Contractor, Environmental Health and Safety (EHS) Program, and all administrative elements of the NCI-Frederick. This program applies to temporary employees, part-time employees, and full-time employees in these areas. It also applies to subcontracted employees.

III. Definitions

Hazardous Chemical - Any chemical that presents either a physical hazard or a health hazard.

Health Hazard - A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term health hazard includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

Physical Hazard - A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

IV. Responsibilities

A. Supervisor

1. Review each new operation, activity, or equipment to identify potential new chemical hazards.

2. Ensure that employees receive job-specific training (i.e., training in the potential hazards of specific chemicals in their work areas, in the safe handling of these hazardous chemicals, and in related emergency procedures).

3. Provide job-specific training before employees begin work with hazardous chemicals, and before existing employees are exposed to new hazards. Document job-specific training and provide this documentation to EHS upon request. EHS assistance is available as requested.

4. Refer employees to Occupational Health and Safety (OHS) if the supervisor suspects that the employee may have been overexposed to a chemical.

5. Enforce the requirements and practices contained in this Chapter, in program-specific standard operating procedures (SOPs), and in the NCI-Frederick Safety and Environmental Compliance Manual.

6. Maintain a complete inventory of hazardous chemicals in the non-laboratory worksite and provide this to EHS upon request.

B. Employee

1. Treat all chemical substances as potentially hazardous. Refer to the Safety Data Sheet to identify specific hazards and safe handling practices for hazardous chemicals to be used.

2. Label containers of hazardous chemicals regardless of the anticipated duration of use (unless all of the hazardous chemicals will be used under direct supervision).

3. Prevent undue chemical exposures by using information and training, engineering controls, personal protective equipment (PPE), and good safety practices.

4. Report to the supervisors or EHS any condition in the workplace that is potentially unsafe.

5. Request assistance from EHS through the supervisor for specific rules and advice on hazardous chemical handling.

C. EHS

1. Provide initial hazard communication training to employees, as outlined in Section VII.A.

2. Maintain documentation of all training provided under the Hazard Communication Program.

3. Assist supervisors in developing and documenting program specific training. The use of the New Employee Safety Checklist is a valuable tool and recommended for this purpose.

4. Maintain a master inventory of all hazardous chemicals in non-laboratory areas.

5. Ensure that the safety data sheet and/or other relevant chemical safety information for each item on the hazardous chemical inventory is readily available to employees upon request.

V. Labels and Other Forms of Warning

A. Incoming containers

1. Employees shall read labels on incoming containers of hazardous chemicals in order to refresh their training on the following basic information: name of the hazardous chemical, appropriate hazard warning, and protective measures to observe. Deficiencies in the labels of containers should be referred to EHS.

2. Labels shall remain affixed to the container and shall not be defaced unless all material has been removed from the container.

B. In-use containers:

1. Whenever the contents of a container are to be transferred to another container, the employee performing the transfer is responsible for properly labeling the secondary container with its contents and the appropriate hazard warning.

2. The supervisor of the employee performing the transfer is responsible for ensuring that the secondary container is properly labeled by the employee. Questions on appropriate labeling should be referred to EHS.

VI. Safety Data Sheet

A. General

Safety data sheets are readily available to employees and are the basic means of communicating information about possible physical and health hazards. Electronic information is readily available from various Internet sites.

B. Obtaining a Safety Data Sheet

1. Use the Internet access to find a safety data sheet for a chemical or product. Safety data sheets are available for most chemicals from most manufacturers at numerous Internet sites. The EHS home page at the NCI-Frederick web site has a list of Internet accessible sites.

2. Request a safety data sheet by contacting EHS at x1451.

VII. Employee Information and Training

A. Initial Training

1. During the New Employee Orientation session, EHS provides initial safety orientation training of newly hired employees who may be exposed to hazardous chemicals. Employees shall complete training prior to working with or around hazardous chemicals.

The initial training program provides employees general information on:

a. The requirements of the NCI-Frederick Hazard Communication Program and its implementation.

b. That all employees in operations using hazardous chemicals are informed of such by their supervisor.

c. The general classes of hazardous chemicals used at NCI-Frederick and the hazards they pose.

d. The location and availability of the written Hazard Communication Program and the availability of safety data sheets and other hazard information sources.

e. General health and safety procedures relating to the use of hazardous chemicals.

f. The labeling requirements for hazardous chemicals.

g. The safety data sheet and how it is used in relation to worker health and safety.

h. Methods and observations to detect the presence or release of a hazardous chemical in their work areas, including air monitoring, visual appearance, odor, etc.

i. General measures they can take to protect themselves from hazardous chemicals, such as safe work practices, engineering controls, and use of personal protective equipment.

j. General procedures for responding to emergencies and for dealing with unusual operations.

2. The supervisor provides job-specific safety training on hazardous chemicals in the employee's work areas before the employee begins working with the hazardous chemical.

3. The overall effectiveness of the Hazard Communication Program relies on active employee participation in all aspects of the effort, particularly concerning the scope and depth of training. Employees are encouraged to bring problems or questions concerning hazardous chemicals to the attention of EHS and/or their supervisor.

B. Periodic Training

1. Supervisors provide additional training when a new chemical hazard is introduced into the work area(s), when a hazardous chemical is used for a new purpose that presents different potential hazards, and when new, significant information is received about hazardous chemicals already in the work area(s).

2. General training on the Hazard Communication Program is conducted every two weeks by EHS during New Employee Orientation. Although not mandated by regulation, employees are encouraged to attend this refresher training as needed. At the request of the supervisor, training on program specific elements will be presented by EHS.

C. Recordkeeping

EHS maintains a record of all safety training provided by EHS to employees. Upon request, supervisors are required to provide EHS with documentation on the specific content of safety training including a list of persons receiving the training and date of delivery.

VIII. Miscellaneous

A. Non-routine Tasks

EHS will assist a supervisor as requested in providing training to employees who perform non-routine tasks. Training can include a discussion of the health and physical hazards that may be encountered and procedures for measuring, if appropriate, and protecting against those hazards, including the use of monitoring instruments, engineering controls, and personal protective equipment. It is the supervisor's responsibility to notify EHS of non-routine tasks. Training on non-routine tasks is required to be documented and provided to EHS for recordkeeping.

B. Unlabeled Piping Systems

Supervisors will train employees on the hazards associated with chemicals contained in unlabeled pipes in their work area. The training includes discussion of the hazards in the pipe(s) and safety measures the employees shall take to work safely on the pipe(s). Training on the potential hazards of unlabeled pipes is required to be documented and provided to EHS for recordkeeping.

C. Outside Contractors

1. It is the responsibility of FME and Contracts Office in coordination with EHS to ensure that outside contractors have been provided the following information before starting work at NCI-Frederick.

   a. Hazardous chemicals to which they or their employees may be exposed while working at NCI-Frederick.

b. Precautions their employees shall take to reduce the possibility of exposure to those hazardous chemicals

c. Subcontractors are responsible for training their employees on their internal procedures in accordance with all applicable OSHA regulations. Subcontractors shall complete this training prior to commencement of work at NCI-Frederick.

2. A copy of "Safety Information for Contractors" shall be provided by the Contracts Office to each contractor working at NCI-Frederick. Call EHS x1451 for a copy.

IX. Inventory of Materials

A. General

An inventory of hazardous chemicals onsite in non-laboratory areas is required to document hazardous chemicals that employees may encounter in the workplace. Annually EHS will request supervisors to forward their area inventory for incorporation in a master non-laboratory inventory report.

B. Maintenance of the Inventory

EHS, based upon inventory provided by supervisors, revises the master non-laboratory inventory annually to include new chemicals and remove others that cease to be used or stored. The EHS review date will be documented on the inventory.

X. Global Harmonization

In March 2012, OSHA published their revised Hazard Communication Standard (HCS) consistent with the Global Harmonization Standard (GHS). Compliance with the revised HCS becomes mandatory in June 2015. The GHS process is designed to improve comprehensibility, and thus the effectiveness of the Hazard Communication Standard, and help to further reduce illnesses and injuries. GHS is a system that defines and classifies the hazards of chemical products, and communicates health and safety information on labels and safety data sheets. The most significant changes to the Hazard Communication Standard will include changing terminology: "hazard determination" to "hazard classification" (along with related terms) and "material safety data sheet" to "safety data sheet". The goal is that the same set of rules for classifying hazards, and the same format and content for labels and safety data sheets will be adopted and used

around the world. An international team of hazard communication experts developed GHS.

The biggest visible impact of the GHS is the appearance of and information required for labels and safety data sheets. Labels will require signal words, pictograms, precautionary statements and appropriate hazard statements. The GHS system covers all hazardous chemicals and may be adopted to cover chemicals in the workplace, transport, consumer products, and pesticides. Safety data sheets will follow a new 16-section formation, containing requirements similar to those identified in the American National Standards Institute (ANSI) Z400 and International Organization for Standardization (ISO) 11014 standards.

Information on GHS classification, labels and safety data sheets is available at: http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html

XI. References

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