

EMPLOYEE RIGHT TO KNOW: HAZARDOUS SUBSTANCES

Handling hazardous substances is part of the daily duties for many facility/maintenance employees. Pesticides, solvents and other cleaning agents are just some of the examples of chemicals that can expose employees to harm if not handled properly. The Occupational Safety and Health Administration (OSHA) requires that a safety program be in place to help protect employees who are exposed to dangerous materials.



EMPLOYEE RIGHT TO KNOW



EMPLOYEE RIGHT TO KNOW (ERTK)

Minnesota OSHA requires that employers have a formal, comprehensive written program that details how hazardous substances and other harmful physical agents, such as heat, noise, radiation and infectious pathogens, are identified and how employees will be trained to work safely with and around them.

The program must include all of the following:

- An inventory of hazardous substances and/or agents in the workplace.
- Identification of employees who are routinely exposed to these substances or agents.
- A system for obtaining and maintaining written information about these substances or agents.
- Methods for making ERTK materials, including safety data sheets, readily accessible to employees and other exposed workers (e.g., independent contractors) in their work areas.
- A plan for providing and recording pre-assignment and annual employee training.
- Implementation and maintenance of a labeling system and other warning methods.

SAFETY DATA SHEETS

A key component to the Employee Right to Know program is safety data sheets (SDS). Each substance has a corresponding SDS that is made up of 16 categories, detailing information about that substance. This information includes the chemical composition, hazard identification, first aid, handling, storage and other details pertaining to the substance.

All distributors of these materials are required to make available corresponding safety data sheets, but it is the duty of the employer to maintain a copy for each substance used in the workplace. These SDS need to be retained for 30 years even if the material is no longer in use.

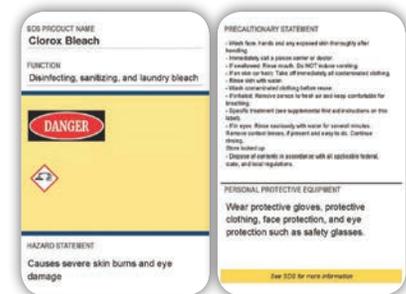
Whether SDS are kept in hard copy form in a notebook or maintained in an electronic version, they must be easily accessible to employees. Special consideration should be given to SDS access for employees working after normal operation hours, contracted individuals, and password protected computers when using online information.

Missing or outdated safety data sheets can often be replaced by obtaining them directly from the chemical supplier or from the manufacturer. They can also be found via Internet searches.

CONTAINER AND PIPE LABELING

Purchased chemical products should already come with a label that provides hazard warnings and other related health information. However, when a product is moved from its primary container to a secondary, workplace container, that secondary container needs proper labeling, too.

The labeling on secondary containers must provide employees with an immediate, clear understanding of the primary health and/or physical hazard(s) of the hazardous substance in the



Labeling on secondary containers for chemicals must be clear about the substance and its hazards.

container through the use of words, pictures, symbols or any combination of these elements. Care must be taken to assure that these labels do not fade or get washed out.

If an employee keeps control of a secondary container and uses its entire contents or returns the remaining chemical back to the primary container, this labeling is not required. However, if this workplace container is put aside and not kept in the control of the employee, labeling is necessary.

Many buildings also have a maze of piping throughout the facilities carrying water at different temperatures, gas, waste water and other materials. Clearly labeling the contents of pipes can help with identifying leaking substances and aid with closing proper valves to minimize the effects of a leak.



Clearly labeling pipe contents can help identify leaking substances.

TRAINING

Training is required to make employees aware of:

- Hazards to which they may be exposed, to know the short- and long-term effects of exposure to substances or agents, and how to protect themselves from exposure (e.g., appropriate personal protective equipment and/or clothing, etc.)
- How to find, read and use information on safety data sheets, labels or other reference materials.
- Appropriate work practices. Employers should enforce these work practices.

Employee Right to Know training is required for employees:

- When they are assigned to a workplace where they may be routinely exposed to a hazardous substance, harmful physical agent or infectious agent.

- When any new or additional hazardous substance or agent is introduced into the workplace and there is routine exposure.
- When information on a safety data sheet changes.
- When a hazard changes.
- Annually as a refresher.

Records of ERTK training must be retained for a minimum of three years but may be longer, depending on an organization's retention rules.

Further safety rules and regulations regarding the Minnesota Employee Right to Know program and additional details about emergency eyewash/shower stations are available at the Minnesota Department of Labor and Industry's website, DLI.mn.gov.

Emergency Eye Wash/Shower Station

If employees have potential splash exposure to corrosive chemicals, an emergency eyewash station and/or shower must be installed within 55 feet of the exposure area. At this distance, an employee should be able to reach the station within 10 seconds to rinse eyes or skin after a chemical splash.

Corrosive chemicals can be found in boiler additives, batteries, cleaning solutions and other products. If the chemical product has an indicated pH of 0-2 or 11-14 on its corresponding safety data sheet, it can be assumed to cause significant eye irritation and possibly permanent damage or blindness. Some products with a pH between these values may still cause damage to eyes or skin; it is important to review the label or SDS for every chemical product in use.

If chemical products contain highly corrosive chemicals and indicate a strong acid (pH less than or equal to 1) or base (pH greater than or equal to 12), American National Standards Institute recommends an eyewash station be positioned immediately adjacent to the area where potential splashes of this chemical may occur. Consult the SDS for any specific details related to these chemicals.

Emergency eyewash and shower stations can be plumbed in or installed as stand-alone units. Plumbed stations should include a mixer to control temperature to a tepid range between 60 degrees and 100 degrees Fahrenheit. If the water temperature is beyond this range, an affected employee may not rinse long enough to be effective.

Plumbed stations must be evaluated weekly to ensure cleanliness, easy access and that all components are in good, working order. During these

weekly inspections, the water must be run long enough to verify operation and to clean the lines of potentially harmful bacteria or other contamination. Inspection of portable or self-contained units should follow the manufacturer's instructions for content and frequency of inspection. If the manufacturer lacks guidelines on maintenance or frequency, checks should be done periodically to verify the level of solution, the flushing solution is changed per manufacturer guidelines, the unit is not blocked and that commercially available solutions for eye flushing are used. The weekly inspections for plumbed stations and periodic inspections for stand-alone stations should be recorded on a water resistant tag near the unit.

Given these requirements, it may be prudent to switch to safer alternative chemicals that do not require the presence of an emergency eyewash or shower station. Organizations such as the Environmental Protection Agency (EPA) offer certifications, such as the Safer Choice program, that feature less hazardous alternative chemicals. Vendors can also help potentially supply less hazardous chemicals.

SDS for any new chemicals should be reviewed prior to removing or determining the need for emergency eyewash stations.



Emergency eye wash shower station



EMPLOYEE RIGHT TO KNOW CHECKUP

ITEM	YES	NO	ACTION ITEM
Is a written Employee Right to Know program reviewed annually and as necessary updated?			
Is the ERTK program available for all employees to see?			
Is there an inventory of workplace hazardous materials and harmful agents?			
Is there a record of employees who are routinely exposed to hazardous materials, substances and harmful agents?			
Is ERTK information, including safety data sheets, available and current on all hazardous materials and agents?			
Do all employees and contracted individuals have easy access to ERTK information in written or electronic format?			
Is training conducted and recorded on the safe use of hazardous substances and safely working around harmful agents for new employees before being assigned job duties?			
Is ERTK refresher training conducted and recorded annually?			
Are all primary and secondary containers of hazardous substances labeled to provide clear understanding of the product and its related safety information?			
Are any corrosive chemicals used that would require the installation of an emergency eye wash and/or shower station?			
If an emergency eye wash/shower station is installed: <ul style="list-style-type: none"> • Is the flushing fluid temperature maintained between 60 degrees and 100 degrees Fahrenheit? • Is the access path to the station kept clear and unobstructed? • Are weekly inspections conducted of plumbed units with periodic inspections of self-contained units to ensure the cleanliness and working order of the station? • Are weekly inspections recorded and kept in good condition near the station? 			