



**Georgia Institute of Technology  
Hazardous Chemical Protection and  
Employee Right to Know Plan  
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**Georgia Institute of Technology  
Environmental Health & Safety  
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1. **Policy Statement** : It is the responsibility of the Georgia Institute of Technology to provide employees with a safe and healthful work environment and to comply with all applicable State and Federal regulations. In order to comply with the Georgia Public Employees Hazardous Chemical Protection and Right to Know Rules, and the University System of Georgia Hazardous Chemical Protection Communications (Right to Know) Plan, this written Hazardous Chemical Protection and Right to Know Plan is established for the Georgia Institute of Technology
2. **Scope:** All work units of the Georgia Institute of Technology (GIT) are included within this program. The written program is available for review at the office of the GIT Right to Know Coordinator, located at 490 Tenth Street, Room Suite 313.
3. **Definitions:**

“Member Unit” means any of the thirty four colleges and universities governed by the Board of Regents of the University System of Georgia.

“Member Unit Right to Know Coordinator” means an individual who is assigned the responsibilities associated with the title in the written member unit Hazardous Chemical Communication (Right to Know ) Plan. The Georgia Institute of Technology Right to Know Coordinator is Deborah Wolfe-Lopez (404-385-2964, [Deborah.wolfe-lopez@facilities.gatech.edu](mailto:Deborah.wolfe-lopez@facilities.gatech.edu) )

“Principle Investigator” (PI) means the person who is responsible for a laboratory and the work that is conducted there.

“University System Right to Know Coordinator” means the individual who is assigned the responsibilities associated with a that title with the Board of Regents (BOR). The BOR Right to Know Coordinator is Sandra Neuse (404-656-2249 <mailto:sandra.neuse@usg.edu> )

“Work area” means a room inside a building or structure, an outside area, or other defined space in a work place were hazardous chemicals are produced, stored, or used add where employees are present in the course o their employment.

“Work Area Supervisor” means the person in charge of a work area, such as a shop supervisor, foreman, lab supervisor, lab manager, or Principle Investigator.

“Work place” means an establishment or business of an employer at one geographic location at which work is performed by a state employee and which contains one or more work areas. In the case of an independent contractor o r subcontractor, the work place shall be defined as all work areas wholly owned or controlled by such independent contractor or subcontractor.

“Work Unit” means a department or an institute within the university which has its own director, manager, or chair.

“Work Unit Right to Know Coordinator” means the individual who is assigned the responsibilities associated with that title as described below.

#### 4. Responsibilities

- 4.1. The GIT Right to Know Coordinator is Deborah Wolfe-Lopez, (404-385-2964, [Deborah.wolfe-lopez@facilities.gatech.edu](mailto:Deborah.wolfe-lopez@facilities.gatech.edu)) who shall:
  - 4.1.1. Act as liaison between the University System RTK Coordinator and the Georgia Institute of Technology on hazardous chemicals issues.
  - 4.1.2. Resolve questions regarding applicability of the Chapter 300-3-19 rules to individual work places and work areas of the Georgia Institute of Technology.
  - 4.1.3. Make arrangements for and/or provide appropriate and adequate RTK training to all employees of GIT.
  - 4.1.4. Ensure that written work place specific hazard communication program be developed for each work place in the GIT. This work place specific program will be available to all employees in the work place and:
    - 4.1.4.1. will include a list of hazardous chemicals used, stored or manufactured in the particular work place.
    - 4.1.4.2. will include written Standard Operating Procedures (SOP) for common laboratory processes involving hazardous materials, waste disposal, and common equipment.
    - 4.1.4.3. will include a new employee orientation check list to be used by the Principle Investigator (PI) or his/her designee to orient new employees/students to the work place.
    - 4.1.4.4. Disseminate updated resource information so that all employees of GIT have access to Material Safety Data Sheets.
    - 4.1.4.5. Accumulate Semiannually the hazardous chemical inventory for GIT.
    - 4.1.4.6. Review, at least annually, the hazardous chemical labeling practices in the work areas where secondary storage containers are used.
- 4.2. The Work Unit Right to Know Coordinator will:
  - 4.2.1. Ensure that all work unit employees receive initial RTK training prior to their work start date and refresher RTK training be accomplished between July 1 and September 30 annually.
  - 4.2.2. Provide The GIT RTK Coordinator with the names of all persons in their work unit working with hazardous chemicals between July 1 and August 1 annually.
  - 4.2.3. Provide the GIT RTK Coordinator with the names of all persons who receive initial RTK training as it is accomplished, and refresher RTK training by October 15 each year.
  - 4.2.4. Submit a chemical inventory in June and December each year for all work places within their work unit that use or store hazardous chemicals.

- 4.2.5. Accumulate hazardous chemical inventory from Principle Investigators or their designees semi annually
  - 4.2.6. Ensure that information on where to obtain MSDSs such as [www.hazard.com](http://www.hazard.com), [www.msdssearch.com](http://www.msdssearch.com), and [www.usg.edu/ehs/msds/index.phtml](http://www.usg.edu/ehs/msds/index.phtml) is prominently displayed in all work areas
- 4.3. Principle Investigators/Area Supervisors
- 4.3.1. Develop a work place specific check list to orient new employees to the chemical and physical hazards specific to their work area
  - 4.3.2. Ensure that employees are made aware of and are properly trained in the uses and hazards associated with chemicals to which they may become exposed in their work area.
  - 4.3.3. Ensure that employees are provided with personal protective equipment appropriate to each work environment, and receive adequate training in the use and maintenance of this equipment.
  - 4.3.4. Accumulate hazardous chemical inventory semiannually.
  - 4.3.5. Arrange for the disposal of any hazardous material remaining on GIT property as a result of the departure of a student.
- 4.4. Department Heads are responsible for ensuring that all unwanted hazardous chemicals remaining on GIT property as a result of the departure of a faculty member are turned over to GIT Environmental Health and Safety

**5. References**

- 5.1. Official Code of Georgia, title 45, Chapter 22, Public Employees Hazardous Chemical Protection and Right to Know Act of 1988
- 5.2. Code of Federal Regulations 29.1926.59 Hazard Communication for the Construction Industry

**6. Program Elements**

- 6.1. Procurement of Hazardous Chemicals
  - 6.1.1. It is the responsibility of the person approving the purchase of a chemical to determine whether a chemical or product used is a hazardous chemical under the law.
  - 6.1.2. It is the responsibility of the chemical user to inform the GIT RTK Coordinator of the acquisition of a hazardous chemical not already listed on the work unit's inventory.
  - 6.1.3. It is the responsibility of the user to inform the GIT RTK Coordinator when a highly toxic chemical ( $LD_{50} < 50$  mg/kg,  $LC_{50} < 200$  ppm) is received.
- 6.2. Material Safety Data Sheets (MSDS): It is the responsibility of the person procuring a hazardous chemical to obtain and review the MSDS for that chemical.
- 6.3. Container Labeling
  - 6.3.1. The person ordering a chemical or product containing a hazardous chemical should verify that all containers received for use will clearly

labeled as to the contents, display appropriate hazard warnings, and list the name and address of the manufacturer.

6.3.2. Never deface a manufacturer's label unless the container has been emptied and rinsed.

#### 6.4. Secondary Containers

6.4.1. The work shift supervisor in each section should ensure that all secondary containers are labeled with manufacturer's name, and basic hazard information (NFPA labels work well for this).

6.4.2. Secondary containers intended for one work shift or less shall be labeled at a minimum with the name of the contents and the user's name.

6.4.3. Vials and test tubes may have hazard labels affixed to the rack or container in which they are held, rather than every vial or test tube, so long as every vial or tube in the rack presents the same hazard.

6.5. Unlabeled Containers: If an employee finds a container in the work area that is unlabeled or has a defaced label and is thought to contain a hazardous chemical, the employee should immediately notify the work place supervisor. If the supervisor is unable to identify the container, the supervisor should immediately call the GIT Hazardous Materials Manager, Ed Pozniak (4-6224).

#### 6.6. Employee Training:

6.6.1. Current Employees must have received Right to Know Training no later than 30 June 1992 and refresher training annual thereafter. Refresher training can be accomplished by on line training at <http://www.usg.edu/ehs/training/rtkbasic/>. Individuals should print out the completion certificate at the end of the training and forward a copy to their Work Unit RTK Coordinator. Work Unit RTK coordinators can Contact Deborah Wolfe-Lopez for a complete list of those persons in their departments that have completed the training on line.

6.6.2. New Employees will receive RTK BASIC training prior to starting work. This training is usually presented at new employee orientation and may include showing the video program "Your Right to Know" produced by the Georgia Department of Labor for such training. This program covers all the required points of the Georgia Right to Know Law. Any additional RTK policies established for GIT will be presented at this time. Other training may be substituted for the video tape as long as it is presented by a competent person as determined by EH&S and follows all the requirements under the law.

6.6.3. Employees Handling Hazardous Chemicals: The immediate supervisor of any employee who will routinely work with any hazardous chemical must ensure that before beginning work, each such employee receives additional chemical specific training on the specific chemicals present in the work place:

6.6.3.1. their hazards and health effects

6.6.3.2. methods and observation techniques used to determine the presence or release of the chemical in the work areas

- 6.6.3.3. how to avoid or lessen exposure to the chemical, proper work practices, use of engineering, administrative controls, and personal protective equipment
- 6.6.3.4. emergency procedures to be followed in the event of a release and/or exposure
- 6.6.3.5. procedure for safe disposal of waste chemicals.
- 6.7. Documentation of Training: Documentation of all training sessions must be made and forwarded to EH&S
- 6.8. Maintenance of training records: copies of training documentation must be maintained for 3 years.
- 6.9. Additional Training- Change in Process or Increased Hazard: Prior to the introduction of a new chemical or change in the way an old chemical is used, the immediate supervisor (PI, lab manager, foreman) of the affected employee(s) must ensure that any additional safety training specific to the new situation has been provided. EH&S can be contacted to assist with this, if needed. A record of this training must be kept and maintained by the supervisor for 3 years.
- 6.10. Contractors:
  - 6.10.1. The GIT Project Manager is required to inform contractors of any chemicals to which the contractor's or subcontractor's employees may be exposed as a result of working on GIT property and to provide MSDS for those chemicals upon request.
  - 6.10.2. A contractor doing work at GIT is required to notify the GIT Project Manager in writing, of any hazardous chemicals which will be used or stored at the work site by the contractor or sub-contractors 30 days prior to the start of work. (This 30 day requirement may be waived in the event of an emergency).
  - 6.10.3. If there will be GIT employees in or near the work area and it is feasible that GIT employees may be exposed to chemicals brought on site by the contractor, then the GIT Project Manager will disseminate this information to the work area supervisor and obtain from the contractor, MSDSs for those hazardous chemicals and make them readily available to affected GIT employees during the contractor's presence at the site.
  - 6.10.4. Contractors are required to comply with The Federal Hazard Communication Standard for the Construction Industry, 29 CFR 1926.59 which ensures that the contractor's and subcontractor's employees have been trained in the hazards of the chemicals with which they are working. Contractors and subcontractors will be prepared to furnish to GIT, upon request, documentation of this training.
- 6.11. Hazardous Chemical Lists
  - 6.11.1. The Department RTK Coordinators shall supply, in June and December of each year, a list of hazardous chemicals present in the various department work places and storage area to the GIT RTK coordinator. This list shall be compiled on the GIT Chemical Inventory Form (Appendix A, [http://www.safety.gatech.edu/Restricted/chem\\_inv\\_template.xls](http://www.safety.gatech.edu/Restricted/chem_inv_template.xls)) with all associated data provided.

- 6.11.2. The Principle Investigator or work place Supervisor is responsible to ensure that the area's hazardous chemical list is posted at or near the main exit for each workplace.
- 6.11.3. The GIT RTK coordinator shall supply to the University system RTK Coordinator in June and December of each year, a list, by location, chemical name, and manufacturer, of all hazardous chemicals or products present at GIT.
- 6.11.4. The two most Recent GIT Hazrdous Chemical Lists are available upon request from the University System RTK Coordinator, Sandra Neuse [<mailto:Sandra.Neuse@usg.edu>] or the GIT RTK Coordinator, Deborah Wolfe Lopez [<mailto:Deborah.Wolfe-lopez@facilites.gatech.edu>] upon request.

## **7. Non-Conformance and Corrective Action**

- 7.1. Failure by work unit Right to Know Coordinators to submit a complete chemical inventory by the publicized deadline will be reported to member unit chair or director as well as to the dean of the appropriate college
- 7.2. Accident Investigation: Mishaps involving chemicals will be investigated by EH&S
- 7.3. Audit Results: Audit results will be reviewed by the director of EH&S who will make suggestions for improving deficiencies.