

The Medical College of Georgia

Administrative Policies and Procedures

Office of Primary Responsibility:
Environmental Health & Safety, Chemical Safety

Subject:
Hazardous Chemical Protection and Right-To-Know Plan

1.0 Purpose

The Medical College of Georgia has established this plan in order to comply with the Georgia Public Employees Hazardous Chemical Protection and Right-To-Know Act of 1988 as amended, and Georgia Department of Labor Chapter 300-3-19 Public Employee Hazardous Chemical Protection and Right-To-Know Rules.

2.0 Policy

All employees of the Medical College of Georgia (MCG) shall comply with the MCG Right-To-Know (RTK) Plan. This plan is available by contacting the MCG RTK Coordinator in the Division of Environmental Health and Safety (EH&S). No employee of MCG shall be discharged, disciplined, or discriminated against for exercising their rights under this plan.

3.0 Procedure

3.1 Procurement of Hazardous Chemicals

MCG employees will purchase hazardous chemicals according to MCG procurement policies and will ensure that copies of material safety data sheets for these chemicals are sent to the MCG RTK Coordinator.

3.2 Material Safety Data Sheet (MSDS)

A central file of MSDSs will be maintained by the MCG RTK Coordinator. Access to MSDSs will be provided to MCG employees during normal duty hours. Emergency access MSDSs can be obtained by contacting the Public Safety Division. Public Safety will contact the EH&S on-call staff member for emergency access. MSDSs are also available from the MCG EH&S web site at <http://www.mcg.edu/Services/EHS/chemsafe/MSDSLlinks.htm>

3.3 Container Labeling

3.3.1 Original Containers

Any MCG employee ordering a chemical or product containing a hazardous chemical should verify that all containers received for use will:

- Be clearly labeled as to the contents;
- Display the appropriate hazard warnings;
- List the name and address of the manufacturer.

3.3.2 Secondary Containers

Supervisors will ensure that all secondary containers, i.e., containers that chemicals are placed into from "original containers," are labeled with either an extra copy of the original manufacturer's label or with a label containing the:

- Identity of content;
- Appropriate hazard warnings.

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If the secondary container is intended only for short-term storage (one week or less), it shall be labeled at a minimum with the name of the contents and date of filling. Vials and test tubes may have hazard labels affixed to the rack or container in which they are held as long as every vial or test tube in the rack or container presents the same hazard.

3.3.3 Unlabeled Containers

If an employee finds a container in the workplace, and it is unlabeled or carries a defaced label and is thought to contain a hazardous chemical, the employee should immediately notify his or her supervisor or the Chemical Safety Officer during normal duty hours. After hours employees should contact the Public Safety Division who will notify the EH&S on-call staff member.

3.4 Employee Training

3.4.1 Basic Awareness RTK Training.

Prior to beginning work, all MCG employees will receive Basic Awareness RTK Training. The training can be accessed through the web site at <http://www.usg.edu/ehs/training/rtkbasic/> and covers:

- An overview of the hazardous chemical protection laws, regulations, and policies in place for MCG.
- A summary of employee rights in hazardous chemical protection.

3.4.2 Chemical-specific RTK Training.

MCG employees who work with chemicals or who work in an area where chemicals are stored or used will receive Chemical-specific RTK Training in addition to Basic Awareness RTK Training before beginning work. The training can be accessed through the web site at <http://www.usg.edu/ehs/training/chemical/> and covers:

- How to identify hazardous chemicals in the workplace.
- Physical and health effects of the chemicals.
- Methods and observation techniques used to determine the presence or release of the chemicals in the work area.
- How to lessen or prevent exposure to these chemicals by proper work practices and use of personal protective equipment.
- Emergency procedures to be followed in the event of exposure.
- Procedures for safe disposal of waste chemicals.

3.4.3 Hazardous Waste Awareness RTK Training.

MCG employees that work with hazardous chemicals and therefore generate hazardous waste will receive Hazardous Waste Awareness Training before beginning work. The training can be accessed through the web site at <http://www.usg.edu/ehs/training/hazwaste/> and covers:

- Identifying the regulatory drivers for hazardous wastes at University System of Georgia (USG) institutions.

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- Types and identification of hazardous wastes.
- Characteristics of hazardous wastes.
- Determination of hazardous waste status and generator identification number.
- Common areas on campus where hazardous wastes are generated.
- Hazardous waste accumulation and disposal.
- Hazardous waste and emergency response

3.4.4 Bloodborne Pathogens RTK Training

MCG employees who work with or are exposed to fresh human or non-human primate material (blood, fluid, tissue) will receive Bloodborne Pathogens RTK Training before beginning work. The training can be accessed through the web site at <http://www.usg.edu/ehs/training/pathogens/> and covers:

- Definition of bloodborne pathogens.
- Explanation of Universal Precautions.
- Recognizing the sign or label indicating bloodborne pathogen hazard.
- Examples of ways bloodborne pathogens are transmitted from person to person in the workplace.
- Differentiation between engineering control and workplace control.
- Emergency response involving blood or body fluids and waste disposal.

3.4.5 Annual Refresher RTK Training.

MCG employees who are required to take Chemical Specific RTK Training, Hazardous Waste Awareness RTK Training, and/or Bloodborne Pathogens RTK Training will take annual refresher training for each during each calendar year.

3.4.6 Training Records.

RTK Training will be recorded and records will be maintained for three years by the Chemical Safety Office.

3.5 Informing Contractors

Renovation/construction contracts with MCG require the contractors to comply with various MCG procedures. These requirements are outlined in the MCG Guidelines for Contractors and Vendors at <http://www.mcg.edu/services/ehs/firesafe/MCGCVG.pdf>

3.6 Hazardous Chemical Lists

The MCG RTK coordinator will provide the University System of Georgia RTK Coordinator with a list of all hazardous chemicals present at MCG in June and December of each year.

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4.0 Responsibilities

4.1 MCG RTK Coordinator shall:

- Act as liaison between MCG and the University System of Georgia on hazardous chemicals issues.
- Resolve questions regarding applicability of the Chapter 300-3-19 rules to individual workplaces and work areas at MCG.
- Make arrangements for and/or provide training to all MCG Employees as required in the University System of Georgia RTK Plan;
- Ensure that MCG employees have access to current chemical hazard information for those chemicals to which they are exposed or potentially exposed to as part of their employment at MCG.

4.2 Supervisors shall:

- Ensure that employees are informed of any operations in their workplaces where hazardous materials are present.
- Ensure that MCG employees under their supervision receive initial and annual RTK Training as required in this plan.
- Provide employees under their supervision with information and training on specific hazardous chemicals in the work area at the time of their initial assignment and whenever a new hazard is introduced into their work area.