

C-5. EMPLOYEE RIGHT-TO-KNOW: NON-LABORATORY OPERATIONS

I. PURPOSE

This chapter comprises NCI-Frederick's Hazard Communication Program in accordance with 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 Engineering and Planning, all Animal Production Programs, Biopharmaceutical Development Program, Vaccine Pilot Plant, Data Management Services, Environment, Health and Safety 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 responsibilities include:

1. Ensuring that employees receive program-specific training (i.e., training in the potential hazards of specific chemicals in the work areas, in the safe handling of these hazardous chemicals, and related emergency procedures).
2. Program-specific training must occur before initial work with the hazardous chemical begins and whenever new hazards are introduced to the workplace.
3. Documenting the receipt of program-specific training and providing this to EHS, upon request.
4. Maintain a complete inventory of hazardous chemicals in the non-laboratory worksite and provide this to EHS upon request.

B. Employees will:

1. Treat all chemical substances as potentially hazardous. Refer to the MSDS to identify specific hazards and safe handling practices for hazardous chemicals to be used.
2. Label hazardous chemical containers regardless of the anticipated duration of use (unless all of the hazardous chemicals will be used that day under direct supervision).
3. Apply information and training received for their protection and that of fellow workers by preventing undue exposures to hazardous chemicals.
4. Report to their 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. Environment, Health, and Safety Program responsibilities include:

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

2. Maintaining documentation of all training provided under the Hazard Communication Program.
3. Assisting 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 a MSDS and/or other relevant chemical safety information for each item on the hazardous chemical inventory are 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 contents of the containers are to be transferred from stock to other containers, the employee performing the transfer is responsible for properly labeling the container with its contents and the appropriate hazard warning.
2. The supervisor of the employee transferring the hazardous chemical is responsible for ensuring that the secondary container is properly labeled by the employee. Questions on appropriate labeling should be referred to EHS.

VI. MATERIAL SAFETY DATA SHEET (MSDS)

A. General

MSDSs 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 MSDS

1. Use the Internet access to find a MSDS for a chemical or product. MSDSs are available for most chemicals from most manufacturers at numerous Internet World Wide Web sites. The EHS home page at the NCI-Frederick web site has a list of available Internet accessible sites.
2. Request a MSDS 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 MSDSs and other hazard information sources.
- e. General health and safety procedures relating to the use of hazardous chemicals.
- f. Hazardous chemicals inventory.
- g. The labeling requirements for hazardous chemicals.

- h. The MSDS and how it is used in relation to worker health and safety.
 - i. Methods and observations to detect the presence or release of a hazardous chemical in their work areas, including air monitoring, visual appearance, odor, etc.
 - j. General measures they can take to protect themselves from hazardous chemicals, such as safe work practices, engineering controls, and use of personal protective equipment.
 - k. General procedures for responding to emergencies and for dealing with unusual operations.
- 2. The supervisor ensures that program-specific safety training on hazardous chemicals used in employee work areas is provided prior to the employee's 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 ensure that periodic training is provided to employees whenever a new hazardous chemical is introduced into the work area(s), when a hazardous chemical is used for a new purpose that presents different potential hazards, and whenever 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. 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

When requested, EHS will assist a supervisor 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

Supervisor trains employees who work on unlabeled pipes. 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 Exhibit C-5-1, "Safety Information for Contractors", shall be provided by the Contracts Office to each contractor working at NCI-Frederick.

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. At least annually (usually quarterly) 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. REFERENCES

29 CFR 1910.1200 - Hazard Communication.

Exhibit C-5-1

NCI-Frederick Fort Detrick Frederick, Maryland

Protective Services.....	426
Occupational Health Services.....	426
NCI-Frederick Offices.....	427
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SAIC-Frederick, Inc. Human Resources.....	371/372
Data Management Services (DMS).....	362
Facilities Maintenance and Engineering.....	349/350
Charles River Laboratories.....	1021
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Construction Contracts.....	1050

For directions, call (301) 846-1091

Safety Information for Contractors to NCI-Frederick

While you are a contractor at NCI-Frederick, your safety and that of your employees is important to us. Please use the information in this document and feel free to ask your SAIC-Frederick, Inc., contact for any other information you might need.

This document is provided to assist you in understanding the safety policies while working at NCI-Frederick. The information highlighted in this document applies to all contractor employees and lower-tier subcontractor employees and is not all-inclusive of your health, safety, or environmental requirements while working at NCI-Frederick.

1. EMERGENCY REPORTING

In case of an emergency (fire, chemical spill, or medical):

- a. Dial 911
- b. Give your exact location
- c. State the nature of the emergency (fire, spill, medical emergency, etc.)
- d. Evacuate when necessary

2. EVACUATION

On the back of this document is a Facility layout with arrows identifying exits from Fort Detrick. In the event of an emergency requiring a Facility-wide evacuation, you are to use an identified evacuation route. The evacuation of each building is generally signaled by the audible/visual fire alarm system or voice announcement through a Facility-wide intercom system.

3. HAZARD COMMUNICATION

Material Safety Data Sheets

As a contractor at the NCI-Frederick, you can review the Material Safety Data Sheet (MSDS) of any **hazardous chemical** to which you or your employees may be exposed at the job site. Electronic access to MSDS information is readily available from chemical manufacturers via the Internet. If you need assistance in locating MSDS information, ask your supervisor, the Facilities Maintenance & Engineering (FME) representative, or contact the **NCI-Frederick Environment, Health and Safety Program at 301-846-1451**.

Contractors at the NCI-Frederick are required to provide the FME representative with an MSDS and "Chemical Usage Report" before bringing any hazardous chemical onto the Facility. The "Chemical Usage Report" form is available from the FME representative or on the Internet at:

<http://home.ncifcrf.gov/ehs/uploadedFiles/Chemical%20Usage%20Report.doc>

A **hazardous chemical** includes any material that is a physical hazard or a health hazard. Physical hazards include combustible liquids, compressed gases, explosives, flammables, organic peroxides, oxidizers, pyrophorics, unstable or reactive materials, and water-reactive materials. Health hazards include cancer-causing agents, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, liver toxins, kidney toxins, nervous system toxins, agents which act on the system that forms blood products, and agents which damage the lungs, skin, eyes, or mucous membranes.

Work Area Hazards

Precautionary information specific to each hazardous chemical is available from the MSDS. Contractor employees must restrict their activities to the designated work area. Access to any other area must be authorized by the FME representative prior to entry.



Labels and Other Forms of Warning

Contractor employees must read and understand the labels on containers of hazardous chemicals to refresh their training on the following basic information: name of the hazardous chemical, appropriate hazard warning, and precautionary measures to observe. Labels shall remain affixed to the container and shall not be defaced unless all material has been removed from the container.

Whenever the contents of an original container are to be transferred to another container, the employee performing the transfer is responsible for properly labeling the secondary container with its identity and the appropriate hazard warning. The supervisor of the employee transferring the hazardous chemical is responsible for ensuring that the employee properly labels the secondary container.

4. RESPONSIBILITY

Except as otherwise provided in this paragraph, the contractor will at all times remain totally responsible for the actions and health and safety of its employees while on-site at any NCI-Frederick facility. Nothing in this document shall confer on NCI-Frederick any responsibility for ensuring or overseeing the safety of contractor's employees beyond conditions that are within the complete control and jurisdiction of NCI-Frederick.