Employee Right to Know (ERK)

Purpose

Normandale’s “Employee Right to Know Program” exists to help provide a safe campus to Normandale staff as well as students. This plan provides information to those who are working with chemicals which may have hazardous properties and the necessary precautions to ensure employee and student safety.

Regulatory Basis

The basis for this plan is OSHA Standard 29 CFR 1910.1200

Responsibilities

Campus Safety Officer:

- Providing basic training for campus employees.
- Providing assistance to Supervisors in the implementation of the ERK program.
- Reviewing the labeling and hazard warning labels on all containers.
- Providing an inventory database of materials as supplied by the departments.
- Compiling Material Safety Data Sheets for all hazardous materials.
- Maintenance of campus records.

Departments

- Submission of hazardous chemical inventories to the Campus Safety Officer.
- Implementation of the plan.

Employees

- Active participation in campus training events.
- Knowledge of information provided in the Material Safety Data Sheets.
- Requirement that MSDS sheets are forwarded to the college with each purchase.
- Proper labeling of all bottles.
Contractors and Vendors

Contractors working on our campus will be required to have the same safety information available at all times. Normandale has the right to refuse the use of any product which poses a high risk.

Labels and Warnings

Bottles without labels are a huge liability to Normandale both in terms of potential accidents that could harm a coworker to the potential of large fines to the College. On our own campus, an Aquafina water bottle was found in a department containing a cleaning fluid that was clear. The staff in that department knew what it was, but no one else did. The potential for someone to be hurt was huge. To make Normandale a safer campus and to comply with OSHA regulation 29CFR1910.1200 the topics covered below apply to all employees, students and vendors on our campus.

Labels and Warnings

All containers including secondary containers on our campus shall be labeled with the following information:

- Identity of the chemical.
- The appropriate hazard warnings (Warning Extremely Flammable, etc).
- The name and address of the manufacturer.

The following items should be taken into consideration:

- Try to avoid secondary containers whenever possible.
- Avoid handwritten labels if possible.

The following rules apply for lab experiments in which there are “unknowns” as part of the experiment:

- A number or letter should be on the unknown container.
- A College Lab Assistant or Faculty member must be present who can determine the “unknown”

The following rules apply to all piping:

- Where accessible to employees, pipes and piping systems containing hazardous materials must be labeled as to their contents.
- Employees working with piping should be familiar with the information about the product inside of pipes as they would be with any other hazardous material.
Trade Secrets:

- Under certain circumstances we can pursue this information. Please contact the Campus Safety Officer to pursue this.

Over the Counter Products:

- Cleaners which are commonly used in households that can be purchased at local retail stores may be used without any further labeling as long as it is in the original container. This practice is discouraged.

NFPA Symbols

- The use of the NFPA diamond with symbols is not encouraged at this point, but may be used in the future as we become more and more consistent with our labeling.

Employee Training

Employee training will be provided on an annual basis and will cover the following:

- OSHA 29CFR 1910.1200
- The location of the Material Safety Data Sheets in their departments as well as our MSDS Online Service.
- How to read and understand Material Safety Data Sheets.
- Where to find and obtain the written ERK program.
- Personal Protective Equipment (PPE) policy.
- Emergency procedures.

Material Safety Sheets

Material Safety Data Sheets can be accessed in the following ways:

- Hard Copies are located in each lab or work center which has hazardous materials.
- Online by going on the INET and selecting Environmental Health and safety. An MSDS icon will appear and direct you to the proper chemical.
- Archived copies of formerly used chemicals are and will be maintained by Building Services for 30 years.

Record Keeping

- Record keeping will be maintained by the Campus Safety Officer in conjunction with Human Resources.
• Reviewed 10/6/2010