Case Western Reserve University

Chemical Hygiene Plan

⚠️ The Chemical Hygiene Plan applies to your laboratory only if you meet ALL of the following criteria:

(i) Chemical manipulations are carried out on a “laboratory scale”;
(ii) Multiple chemical procedures or chemicals are used;
(iii) The procedures involved are not part of a production process; and
(iv) “Protective laboratory practices and equipment” are available and in common use to minimize the potential for employee exposure to hazardous chemicals.

The Hazard Communication Standard applies to those that meet the following criteria:

(i) Laboratories that are using only commercial products or a small amount of chemicals in a non-laboratory use.
(ii) All non-laboratory employees who may be exposed to hazardous chemicals in the course of their work, both normal conditions and emergencies.
(iii) Consumer products when not used in the same frequency and volume as the consumer.

IF YOUR LABORATORY DOES NOT MEET ALL OF THE ABOVE CRITERIA, CONTACT EHS (368-2907) FOR CONSULTATION.

OSHA Definitions:
Laboratory: a facility where the “laboratory use of hazardous chemicals” occurs. It is a workplace where relatively small quantities of hazardous chemicals are used on a non-production basis.

Laboratory scale: work with substances in which the containers used for reactions, transfers, and other handling of substances are designed to be easily and safely manipulated by one person. Excludes those workplaces whose function is to produce commercial quantities of materials.
## Chemical Hygiene Plan

The Chemical Hygiene Plan (CHP) is a laboratory specific document that details the safety procedures in use in a specific laboratory. The Hazard Communication Plan (HCP) is a document that details the safety procedures for certain laboratory employees and all non-laboratory employees who may be exposed to hazardous chemicals in the course of their work, both in normal conditions and emergencies. The HCP applies to laboratories that are using only commercial products or a small amount of chemicals in a non-laboratory use. The HCP also applies to consumer products when not used in the same frequency and volume as the consumer. The goal of the CHP is to provide the necessary guidance to the laboratory staff or employee required to maintain a safe work environment while dealing with hazardous materials or physical/health hazards.

The Primary Investigator (PI) of a laboratory or the supervisor of non-laboratory employee is responsible for maintaining a safe work environment for the laboratory staff/employee. As such, the PI is given the title of Chemical Hygiene Officer (CHO). The CHO is required by federal law to provide a CHP/ HCP to the laboratory staff/employee that is specific to the laboratory/work area for which it was written. Further, the CHO is responsible for providing training in the CHP/ HCP sufficient to allow the laboratory staff/employee to implement the CHP/ HCP. This training is required initially upon employment, and when there is a change in the plan or annually, whichever is the shorter time interval.

Upon employment at CWRU, all employees dealing with or possibly having exposure to hazardous materials are given an overview OSHA Laboratory Standard class at the EHS office. This training is NOT substitute training for the laboratory specific training to be given by the CHO. EHS publishes a Laboratory Safety Manual and Physical Safety Manual to be used as a reference in producing a CHP. These manuals are available on the EHS website (https://www.case.edu/ehs/).

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<th>Date:</th>
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<tbody>
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<td>Primary Investigator’s (CHO) Name: __________________________</td>
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<td>Primary Investigator’s Email: _______________________________</td>
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<td>Primary Investigator’s Department: __________________________</td>
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<td>Primary Investigator’s Phone: _______________________________ Fax: __________________________</td>
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<td>Primary Investigator’s (CHO) Signature: ______________________</td>
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<td>Laboratory Location: Building: __________________ Room: ________</td>
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<td>Laboratory Location: Building: __________________ Room: ________</td>
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Complete and send a copy to: EHS
Service Building, First Floor
Location Code: 7227
Attention: Safety Services
## Review Date

Review the CHP/HCP annually and/or whenever there are any changes in procedure. Submit a copy of the title page, this sheet, and any changes to the EHS office.

<table>
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<tr>
<th>Review Date:</th>
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# Annual CHP Training Log

**DATE:** __________  **LOCATION:** Building: __________  Room: __________

Primary Investigator (CHO): ______________________________________

*PLEASE CLEARLY PRINT ALL INFORMATION REQUESTED BELOW EXCEPT FOR YOUR SIGNATURE*

<table>
<thead>
<tr>
<th>PRINT NAME</th>
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The CHP/ HCP must include the following items:

**Training Outline**

Outline the laboratory-specific training to be given to the laboratory staff by the CHO. Assigning your staff to read the CHP/ HCP does NOT constitute a training class.

**Laboratory Personnel**

List the work positions and names of people in the laboratory/ work area.

**Examples:**

<table>
<thead>
<tr>
<th>Laboratory</th>
<th>Work Area</th>
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<tbody>
<tr>
<td>4 Research Assistants (names)</td>
<td>4 plumbers (names)</td>
</tr>
<tr>
<td>1 Primary Investigator (name)</td>
<td>1 electrician (name)</td>
</tr>
<tr>
<td>1 Dishwasher (name)</td>
<td>1 supervisor (name)</td>
</tr>
</tbody>
</table>

**Chemical Inventory**

Produce a chemical inventory of all chemicals in the laboratory (include name and quantity). In addition, when the HCP applies, attach Material Safety Data Sheets (MSDSs) for each chemical.

**Laboratory Procedures**

Provide a general description of procedures and tasks performed in the specific laboratory (attach protocols if needed).

**Safety Precautions**

Integrate safety precautions into written lab procedures and protocols or for physical and health hazards present in the work area.

**CHP Example:**

A. Engineering controls available (i.e. fume hoods, biosafety cabinets, etc.)
B. Protective equipment worn (i.e. type of gloves, goggles/glasses, lab coats, etc.)
C. Lab-specific practices (i.e. chemicals in liquid vs. powder forms, designate areas for chemicals, etc.)

**HCP Example:**

A. When cleaning microscope slides with acetone, a buttoned laboratory coat, safety glasses, and the appropriate chemically-resistant gloves must be worn.