Environmental Health and Safety Statement

Iowa State University strives to be a model for environmental, health and safety excellence in teaching, research, extension, and the management of its facilities. In pursuit of this goal, appropriate policies and procedures must be developed and followed to ensure this community operates in an environment free from recognized hazards. Faculty, staff, and students are responsible for compliance with established policies and are encouraged to enculturate practices that ensure safety, protect health, and minimize the institution's impact on the environment.

As an institution of higher learning, Iowa State University

- fosters an understanding of and a responsibility for the environment,
- encourages individuals to be knowledgeable about environmental, health and safety issues that affect their discipline, and
- shares examples of superior environmental health and safety performance with peer institutions, the State of Iowa and the local community.

As a responsible steward of facilities and the environment, Iowa State University

- strives to provide and maintain safe working environments that minimize the risk of injury or illness to employees, students and the public,
- continuously improves operations, with the goal of meeting or exceeding required and applicable environmental, health and safety regulations, rules, policies, or voluntary standards, and
- employs innovative strategies of waste minimization and pollution prevention to reduce the use of toxic substances, promote reuse, and encourage the purchase of renewable, recyclable and recycled materials.

The intent of this statement is to promote environmental stewardship, protect health, and encourage safe work practices within the Iowa State University community. The cooperative efforts of the campus community to remain mindful of these goals will ensure that Iowa State University continues to be a great place to live, work, and learn.

Dr. Steven Leath
President
Directory of Service and Emergency Providers

Services

Environmental Health and Safety
2408 Wanda Daley Drive | (515) 294-5359

Iowa State University Occupational Medicine Department
G11 Technical and Administrative Services Facility (TASF), 2408 Pammel Drive | (515) 294-2056

McFarland Clinic PC, Occupational Medicine
1018 Duff Avenue | (515) 239-4496

Thielen Student Health Center
2647 Union Drive | (515) 294-5801

Emergency

Emergency - Ambulance, Fire, Police
911

Department of Public Safety/ Iowa State University Police
Armory, 2519 Osborn Drive | (515) 294-4428

Mary Greeley Medical Center
1111 Duff Avenue | (515) 239-2011
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A. Introduction

Safety and Compliance Statement

To comply with state and federal regulations and to ensure the safety of university employees and the community, Iowa State University is dedicated to informing all employees who work with hazardous chemicals of both the hazardous properties of these chemicals and the protective measures that are available to minimize exposures to such chemicals. This information will be made available to employees by means of this written manual, labels on chemical containers, Safety Data Sheets (SDS), and training. Employees will be informed of recognized hazards associated with chemicals they work with before their initial assignment and whenever the hazards change. The goal of Iowa State University’s Worker Right to Know (WRTK) Program is to reduce employee exposure to hazardous chemicals, prevent chemical-related injuries and illnesses, and meet regulatory requirements.

Regulatory Basis

The Worker Right to Know Manual has been designed to assist university departments in developing and implementing an action plan to comply with Federal OSHA Hazard Communication Standard 29 CFR 1910.1200 and Iowa Occupational Safety and Health Administration (IOSHA) Hazardous Chemical Risks Right To Know Standard, Iowa Administrative Code Section 875, Chapters 110, 130 and 140, effective March 31, 1999.

On May 25, 2012, OSHA adopted the United Nations’ Globally Harmonized System or GHS. The goal of the standard is to create uniform information for hazardous chemicals. These standard revisions change the format of container labels and safety data sheets. Because of the standard, “Material” has been removed, and a MSDS is now a safety data sheet or SDS.
B. Administrative Responsibilities

Iowa State University

Iowa State University is responsible for ensuring the safety of its employees and for complying with applicable state and federal regulations. University administration places a high value on safety and encourages employees at all levels to promote positive attitudes regarding safety, to incorporate safety into their work practices, and to cooperate fully in the implementation of safety-related programs.

Environmental Health and Safety

The Department of Environmental Health and Safety (EH&S) at Iowa State University is responsible for developing and implementing health and safety-related programs within the university. In fulfillment of this responsibility, EH&S provides this manual and will assist individual departments in the development and implementation of a Worker Right to Know (WRTK) Program in their areas. Specifically, EH&S has the responsibility for

- Developing and providing basic WRTK training for university employees.
- Providing assistance to supervisors and employees in the implementation of the WRTK Program.
- Reviewing the labeling and hazard warning system that is used on secondary containers and ensuring that it is consistent throughout all departments.
- Reviewing safety data sheets on any currently used materials or any proposed new chemicals when there is doubt as to whether the material or chemical has any potentially hazardous ingredients or product safety issues.
- Providing technical guidance and policy interpretation to university personnel.
Departments

Each university department is responsible for evaluating areas under its administrative control and determining whether hazardous chemicals are present. Departments that identify hazardous chemicals in their areas are responsible for adopting and implementing the WRTK program. Departments participating in the program must:

- Designate an Safety Coordinator
- Submit inventories of hazardous chemicals used within the department to EH&S on an annual basis
- Inform contractors working in the area of any hazards that they may encounter during the contract term
- Ensure that managers and supervisors implement the WRTK Program effectively

Safety Coordinator

Each department using hazardous chemicals will designate a Safety Coordinator who will be responsible for facilitating information transfer between the department and EH&S. Safety Coordinators may also provide WRTK training to department employees.

Managers and Supervisors

Departmental managers and supervisors know more than anyone else about the processes and procedures conducted in their areas; therefore, they are primarily responsible for implementing the WRTK Program. The manager or supervisor of each work area is responsible for:

- Making safety data sheets readily accessible to all employees during their work shifts.
- Properly labeling each container of hazardous material in the department with its contents and appropriate hazard warnings.
- Maintaining an inventory of hazardous chemicals present in the workplace.
- Coordinating employee medical consultation and/or surveillance with EH&S and the Occupational Medicine office in the event of an exposure to a hazardous chemical in the workplace.
- Maintaining records as required by IOSHA and EH&S.
- Conduct training programs and ensure online WRTK training is taken by department employees who work with or near hazardous materials, to include
  - Potential hazards associated with workplace chemicals, including the availability of this manual.
Worker Right to Know

- Chemical-specific information (e.g., SDS, chemical inventory)
- Safe work practices
- Engineering controls
- Facility design features
- Personal protective equipment (PPE)
- Emergency procedures
- The methods used to inform employees of the hazards of non-routine tasks (e.g., vessel cleaning) and the hazards associated with unlabeled pipes.

Laboratory Supervisors

Laboratories that use potentially hazardous chemicals are governed by the policies set forth in the Laboratory Safety Manual. Although laboratories are exempt from most requirements of the WRTK Program, lab supervisors are required to

- Ensure that labels on incoming chemical containers are not removed or defaced,
- Require that Safety Data Sheets are readily accessible to laboratory employees, and
- Minimize any potential chemical exposure to employees by ensuring appropriate work practices and informing employees of the potential hazards of the chemicals used in their laboratory.

Employees

The success of the WRTK Program ultimately lies in the hands of university employees. Personnel who work with chemicals need to be conscientious in their efforts to follow the guidelines presented in this manual and to report the existence of health and safety hazards associated with chemical use to their supervisor and/or EH&S. You are in charge of ensuring your own safety

- Actively participate in training programs and comply with training provisions
- Know the hazards of materials you use at work
- Utilize measures that have been prescribed in order to ensure your protection from exposure to hazardous materials
C. Program Requirements

Program Availability

Electronic access to or a paper copy of the Worker Right to Know (WRTK) Manual, appropriate safety data sheets (SDS), and a list of hazardous chemicals must be available to all employees who work with or near hazardous chemicals.

Employees will also be provided access to the Federal OSHA Standard 29 CFR 1910.1200 and Iowa Chemical Risks RTK Standard, Section 875, Chapters 110, 130, and 140. As a fulfillment to this requirement, links to these standards are provided in the introduction to this manual.

EH&S provides several links to other resources on our website.

Hazard Determination

To evaluate the hazards of the chemicals in the workplace, Iowa State University will rely on data from chemical manufacturers, distributors and/or importers from whom hazardous materials are purchased. The information on the SDS is assumed to be accurate and complete.

Hazardous Chemical Inventory

Managers or supervisors must develop and maintain chemical inventories of hazardous chemicals in areas under their control. For the sake of simplicity, any material for which there is an SDS should be considered hazardous. A chemical identity used on the chemical inventory can be a chemical name, common name or other designation, as long as it allows cross-reference to the container label and SDS.

Departments can find more information on the Chemical Inventory Program and how to create a chemical inventory on the EH&S website. Chemical inventories may be submitted in two ways:

- Chemical information may be individually entered into the EH&S online chemical inventory system.
- A CSV (comma delimited) file of the inventory may be uploaded.

To simplify incorporation of your chemical inventory to the central database, please format the list as follows:

- Chemical inventories must be created for each location or room where chemicals are stored.
- Chemical name, quantity and units are the minimum required data. If possible, list the manufacturer, CAS number and location
for each chemical (see example).

If you have questions, contact EH&S at (515) 294-5359.

The following materials are exempt and should not be listed as part of a department’s hazardous chemical inventory:

- Hazardous waste regulated by the EPA.
- Tobacco and tobacco products
- Wood and wood products (in some circumstances wood dust is considered hazardous)
- Articles (furniture, tools, etc.) that do not release or otherwise result in exposure to a hazardous chemical under normal conditions of use).
- Foods, drugs or cosmetics intended for personal consumption by employees.
- Consumer products used in the same manner and duration as a consumer.
- Most office products (e.g. white-out, glues, copier inks and toners, stamp pads, etc.).

Safety Data Sheets

The Safety Data Sheets (SDS) Information and Glossary document describes the information that can be found on SDSs and provides a glossary of terms that may be used on SDSs.

- Departments are required to obtain an SDS from chemical manufacturers, distributors and/or importers for each hazardous chemical used in their work areas and have them available to employees during all work hours. An SDS must be provided, upon request, to employees, their designated representatives, or the Assistant Secretary of Labor/OSHA.
Worker Right to Know

• An SDS should be requested on every purchase-order requisition form. It must be provided to the department (by the manufacturer or distributor) at time of initial shipment, but does not need to physically accompany the shipment. Because manufacturers do not have to send multiple copies to a single employer, it will ultimately be the department’s responsibility to have the SDS in their work areas. Any SDS sent directly to EH&S via purchase orders will be forwarded to the ordering department.

• Departments that transfer or ship hazardous chemicals to other Iowa State University departments or non-university entities must ensure that the receiving party has the corresponding SDS at or prior to the time of transfer. Additional requirements may apply to the shipment of hazardous/infectious materials. Contact EH&S at (515) 294-5359 for details or view more information on Safety Data Sheets at the EH&S website.

• The assistance of the Iowa Occupational Safety and Health Administration may be solicited if the university is unsuccessful in obtaining an accurate and complete SDS from a manufacturer.

Labels and Warnings

Based upon the Global Harmonization System (GHS), specific wording is required on labels. Containers of hazardous chemicals must be labeled or tagged and marked in English (secondary languages, in addition to English, may also be used). Labels must have, at a minimum, the product identifier, signal word, hazard statement, any pictogram, precautionary statement and the name, address and telephone of the manufacturer or the product identifier and words, pictures, symbols, or a combination thereof, which provide at least general information regarding the physical and health hazards of the chemical(s).

When a secondary container must be used, the container must be labeled, at minimum, with the product identifier, signal word, hazard statement. You avoid having to address secondary labeling requirements by ordering smaller containers and refilling containers with manufacturers’ labels already attached.

Departments may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials rather than affixing labels to individual stationary containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required in the preceding paragraph.

Hazardous chemicals transferred from labeled containers may be used in a secondary container without a label, only if the entire contents of the secondary container is used immediately.
Worker Right to Know

All labels must be legible. EH&S discourages the use of handwritten labels.

**Unlabeled Pipes**

Where accessible to employees, pipes and piping systems containing hazardous materials will be labeled as to their contents. Employees will be informed of and/or trained on the potential hazards associated with hazardous chemicals in unlabeled pipes during department-specific Worker Right to Know training.

**Trade Secrets**

Under specific circumstances, the university has the right to request information deemed a trade secret by a chemical manufacturer, as provided in the Hazard Communication Standard. If you wish to pursue such information, contact EH&S at (515) 294-5359 for assistance.

**Information and Training**

Iowa State University employees will be informed of the requirements of the Hazard Communication Standard through a training program. Employees will be informed of operations in their department where hazardous chemicals are present and the dangers posed by those chemicals. Methods to avoid exposure will be explained during department-specific information and training sessions. An online WRTK course, available at the EH&S training website must be taken by all employees that use chemicals outside the laboratory environment.

EH&S provides several links to other resources on our [website](http://www.ehs.iastate.edu).  

**Department Responsibilities**

Safety Coordinators or department supervisors will provide the department-specific WRTK training for their employees. This training will be provided before work with hazardous chemicals begins and whenever new hazardous chemicals are introduced to the work area.

During an inspection, departments are expected to make WRTK training materials readily available for review by Iowa OSHA. This training will inform employees as to

- The location and contents of 29CFR 1910.1200 and the Iowa Chemical Risks RTK standard, Section 875, Chapters 110, 130, and 140.

- The location of the hazardous chemical inventory in their work area.
Worker Right to Know

- The physical and health hazards associated with said hazardous materials.
- How to read and understand Safety Data Sheets and where they are maintained.
- How to read and understand product labels and other warnings used to identify hazardous materials in their work area (e.g., signs, placards, etc.).
- How and where the university’s written WRTK Program can be obtained.
- How to determine the presence or release of a hazardous material in their work area.
- How to protect themselves from physical and health hazards: proper work procedures, emergency procedures, and appropriate personal protective equipment (PPE).
- Emergency procedures for chemical accidents.

Each training session must include verbal presentations, written communication, and the opportunity to ask questions. Audiovisuals (e.g., videos, pictures, etc.) may be used to augment training sessions, but cannot be solely substituted for verbal communication and question-and-answer sessions.

Employees must receive training prior to performing any non-routine task (e.g., vessel cleaning) involving hazardous chemicals and hazards associated with unlabeled pipes. The training will include information on the specific chemical hazards and measures the employee must take to ensure safety during performance of the new task.

**EH&S Responsibilities**

EH&S provides mandatory online training that gives employees an understanding of the WRTK Program, including its training requirements. This course is available at Learn@ISU and must be taken before the employee starts work in their department. Each department’s Safety Coordinator will ensure that WRTK training for hazards specific to each employee’s work area has also been completed.

Online WRTK training from EH&S includes

- How employees can detect the presence or release of hazardous chemicals,
- Types of physical and health hazards of chemicals that may be encountered at work,
Worker Right to Know

- How employees can protect themselves from hazards associated with chemicals and the procedures Iowa State University has implemented to provide employee protection such as workplace practices and PPE, and

- Details of Iowa State University’s WRTK Program, including how to read and interpret information found on chemical labels and Safety Data Sheets.

Record Keeping

EH&S maintains training records for all university personnel who complete EH&S training. Copies may be obtained by viewing your personal training history through the Learn@ISU.

Departments are responsible for keeping proper records of WRTK training they give to their employees. Records should include

- An employee sign-in sheet (with the date, time and location of the training session).

- An outline of topics covered.

- Copies of any written materials given out during the training.

- Quizzes or other means used to ensure employee understanding and retention of materials presented.

Contractor Work

Any contractor hired by Iowa State University will be informed by the contracting department of any chemical hazards present, which its employees may encounter during the term of the contract.

The contractor will be required to adhere to all established safe work practices and university procedures. The contractor will also inform the university, in advance, of all hazardous materials that will be used during a project. Safety Data Sheets will be available for all hazardous products used. Iowa State University reserves the right to refuse the use of any product that poses an excessive risk or will require additional training of university employees.
D. Regulatory Overview

The Iowa Hazardous Chemical Risks Right to Know standard (Iowa Administrative Code Section 875, Chapters 110, 130, 140) includes four main topics:

- 110 - General Provisions
- 130 - Community Right to Know
- 140 - Public Safety/Emergency Response Right to Know (Emergency RTK).
- 1910.1200 - Worker Right to Know

Listed below is a brief overview of the regulatory requirements of each chapter.

Chapter 110—General Provisions

Chapter 110 contains the purpose, scope and application of the Hazard Communication Standard. This chapter requires that hazards of all chemicals produced or imported are evaluated and that the information is transmitted to affected employees and employers. Chapter 110 includes information on

- regulatory exemptions
- definitions
- hazard determination
- labels and other forms of warning
- safety data sheets
- trade secrets

Chapter 130—Community Right to Know

Upon request, Iowa State University will inform the public of the presence of hazardous chemicals stored on campus and the potential health and environmental hazards that the chemicals pose. If the release of the information could create a possible security concern, the university will provide the reason for refusal within ten days. If the request is from a health professional, the information will be provided as soon as possible.

A department’s chemical inventories and information on Safety Data Sheets developed for WRTK may be used to meet the requirements of Chapter 130—Community Right to Know.
Chapter 140—Public Safety/Emergency Response Right to Know

Iowa Public Safety/Emergency Response Right to Know requires departments to identify and label hazardous chemical storage areas. Labels or signs conform to the National Fire Protection Association’s (NFPA’s) standard system for identifying fire hazards of chemicals. Signage rules (based on NFPA standard 704-1980) have been adopted under Iowa code.

Signs shall identify health, flammability, reactivity, and any special hazards. Each category shall indicate severity numerically by five classifications, with “4” indicating a severe hazard and “0” indicating no hazard.

Where posting of signs could be misleading due to small quantities on hand, the posting requirement may be waived. Consult the Hazard Communication Standard or contact EH&S at (515) 294-5359 for details on posting requirements.

Chemical inventories and locations of hazardous chemicals will be made available to the Ames Fire Department, upon their request.

1910.1200 Worker Right to Know

The Iowa State University WRTK Program is intended to ensure compliance to this standard. The statute requires the university to ensure that information concerning chemical hazards is transmitted to affected employees. This must be accomplished by a comprehensive hazard communication program which includes:

- a written program
- employee information and training
- container labeling requirements
- safety data sheets
- department-specific chemical inventories
- contractor work at Iowa State University
- non-routine tasks
- trade secrets
Non-discrimination Statement

“Iowa State University does not discriminate on the basis of race, color, age, ethnicity, religion, national origin, pregnancy, sexual orientation, gender identity, genetic information, sex, marital status, disability, or status as a U.S. veteran. Inquiries regarding non-discrimination policies may be directed to Office of Equal Opportunity, 3350 Beardshear Hall, 515 Morrill Road, Ames, Iowa 50011, Tel. 515 294-7612, email eooffice@iastate.edu”