



2019 *Chemical Hygiene Plan* Updates

According to Federal regulation (29CFR 1910.1450), the *Chemical Hygiene Plan* (CHP) must be reviewed annually and updated as necessary. The Research Safety Policy Council approved the following recent updates to this Plan as proposed below by the Office of Research Safety on March 13, 2019.

In summary, a number of grammatical clarifications and website links have been updated. In addition, one campus-wide change is the replacement of Chalk and CATTs with Environmental Health and Safety Assistant (EHSA-an environmental health and safety data management platform shared by ORS and Environmental Health and Safety) as the on-line training site for *CHP*.

Three more significant updates are listed below for your consideration.

1. In *Chapter II: Authority and Responsibilities* the following were added:
Designated Lab Safety Contacts are responsible for:
 - a. Working with the Principal Investigator/ Laboratory Director and laboratory personnel in ensuring the knowledge and compliance with the requirements in the *Chemical Hygiene Plan*, standard operating procedures, and other laboratory rules;
 - b. Assisting the Principal Investigator/Laboratory Director in providing and documenting laboratory-specific training;
 - c. Serving as a liaison between the Principal Investigator, laboratory personnel, and the Office of Research Safety;
 - d. Collaborating with the Office of Research Safety for the research safety inspection;
 - e. Coordinating the response to any deficiencies noted in the Research Safety Inspection Report.

2. In *Chapter VI: Housekeeping and Laboratory Safety Equipment*:
Laboratories are required to flush their emergency eyewashes monthly (weekly recommended) and maintain the documentation of this monthly flush.
 - Previously, labs were required to flush eye washes weekly based on an American National Standards Institute (ANSI) Standard.
 - Actual governmental regulations were vague, however California OSHA (Title 8 Subsection 5162) required a monthly flush.
 - Some research regarding microbial growth in the pipes also suggest little difference between weekly and monthly activation.

3. Chemical Hygiene Plan – Laboratory Safety training requirements
 - ORS concluded that an initial in-person *Chemical Hygiene Plan* – Laboratory Safety training followed by annual online refresher would lead to more effective learning and stronger safety culture.
 - All incoming graduate students in BSD, IME, and PSD (Chemistry, Geophysical Sciences, and Physics) have been receiving in-person CHP- Lab Safety training during their orientation at the request of the division and departments.
 - This proposed requirement will mostly effect undergraduate students, postdoctoral researchers, and principal investigators new to the University of Chicago as previous researchers who have already taken the online version will be grandfathered in.
 - Also, the new annual CHP- Lab Safety online refresher (previously required every three years) now includes a quick review of the CHP, incorporates the annual *EH&S Fire Safety and Evacuation* training, and will focus on recent laboratory incidents and lessons learned from these incidents. This training

will be updated annually by ORS based on incidents and lessons learned. Researchers are directed to the new CHP- Lab Safety online refresher when their Fire Safety and Evacuation training has expired.

- All researchers should have completed the CHP- Lab Safety by January 1, 2020.