What is a Chemical Hygiene Plan, and do I need one?

The chemical hygiene plan (CHP) is a document that includes all standard operating procedures (SOPs) for your laboratory, the delegation of a chemical hygiene officer, and various pertinent safety information including the use of engineering controls, the use of personal protective equipment, the use of emergency showers and eyewashes, the training required for each laboratory employee, and the provision of medical attention (if needed).

[There is a template CHP available on the EHS website https://e-hs.okstate.edu/node/71.]

The OSHA laboratory standard, 29 CFR 1910.1450, requires all laboratories to have a chemical hygiene plan. OSHA’s definition of a laboratory is “any workplace where relatively small quantities of chemicals are used on a non-production basis.” So, unless you can verify that your laboratory does not meet this definition, your laboratory will need a chemical hygiene plan.

Frequently Asked Questions

What is a chemical hygiene officer (CHO)? I thought OSU already had a CHO?

The chemical hygiene officer is the individual in your laboratory who is responsible for the implementation of the chemical hygiene plan. This individual is generally the laboratory manager or primary investigator, however, it can be delegated to another qualified individual if desired.

How are the CHP and the laboratory safety manual different?

The laboratory safety manual is an overarching document for all laboratories on campus. While it does provide a lot of good safety information, it does not meet all the requirements of a CHP and is too general to be laboratory-specific.

The CHP seems really similar to a HazCom program, do I need both?

If the definition of your laboratory space meets OSHA’s laboratory definition, you will need a CHP rather than a HazCom program. The CHP supersedes the HazCom program for OSHA defined laboratories.

I filled out the CHP template on the EHS website. Does this make me compliant with the OSHA laboratory standard?

Yes and No. The written portion of your program will be compliant, however, you will still need written SOPs and training for each laboratory procedure.
It is important to report all accidents on campus so prompt medical care can be provided to members, if required. Proper medical care is important to reduce the possibility of a minor injury becoming worse. This also allows Environmental Health and Safety (EHS) to arrange an accident investigation. Finding the root cause is important in preventing the same accident from happening to someone else.

The immediate result of an accident may be minor or serious, but they are all accidents. However, if the causes are not identified and corrected, the same conditions that caused the accident in the first place are still there waiting to cause another injury, perhaps with more severe consequences. The accident may have been “minor” the first time, but next time the same type of incident occurs, the odds may be different and the results could be a serious injury, possibly a fatality.

There are also accidents occurring every day that do not cause injuries. We call these accidents a “near miss”. Some people do not regard a near miss as an accident because there was no injury. An example of a near miss is a worker tripping over a cable or falling on something left on the floor. Aside from getting dirty, there was no injury, they brushed themselves off and went back to their job. These events were accidents even though there was no injury. If the problem is not corrected, the stage is still set for another accident, perhaps resulting in an injury the second time.

Experience tells us that for every serious accident, there are a greater number of minor accidents and near misses. When minor accidents or near misses are ignored, the odds increase that a serious accident will occur. Reporting a near miss increases safety awareness for you and your coworkers. Accidents, whether they result in injury or not, are warnings of uncontrolled hazards. EHS strives to identify and remove these from the workplace.

It is critical that all accidents, including near misses, be reported to supervisors immediately so cause(s) can be determined and hazards eliminated. This will help prevent additional injuries from occurring to our most valuable resource — YOU!

For more information on accident reporting please see our webpage: https://ehs.okstate.edu/node/57