|  |  |
| --- | --- |
|  | SOP 2.03 Right to Know OSHA Guidance for HHW Programs |

# 1. Introduction

*Note: This guidance document is for informational purposes only and outlines basic OSHA employer requirements. The MPCA makes no guarantee that this document satisfies the requirements of its users ensuring OSHA compliance. It is the sole responsibility of your specific HHW Program employer(s) to determine if OSHA requirements have been met.*

If employees have a “reasonable” potential for exposure to chemicals, your household hazardous waste (HHW) facility or operation must have a Right-to-Know (RTK) Program. Note: the RTK Program does not pertain to the chemicals *collected* as household hazardous waste (HHW), but rather chemicals *used* by employees in the facility.

# 2. Implementing a Right-To-Know Program

## 2.1 Designate a Right-to-Know Coordinator

The designated staff person responsible for implementing the OSHA RTK coordinator for this Program is [ ].

## 2.2 Right-to-Know documentation

This [RTK Standard](https://www.osha.gov/workers/) Operating Procedure (SOP) is required by this Program, updated annually, and kept on site. The RTK SOP must be reviewed annually by the Program designated staff person.

## 2.3 List and obtain information on chemical and physical hazards

Fill out *Chemical and Physical Hazards List* ([OSHA Workplace Poster](https://www.osha.gov/publications/poster)) This list includes chemicals currently being used by employees (trade or product name) and the corresponding [Safety Data Sheets](https://chemicalsafety.com/sds-search/) (SDS), (SDS on household products located within the facility are not mandatory), HHW chemical category fact sheets, and physical hazards fact sheets (such as noise or heat.) Update list as new hazards occur or when new SDS/fact sheets are obtained.

1. **Chemicals/SDS.** List alphabetically the chemicals/products for which you have SDS; update the list as new chemicals are added.
2. **HHW chemical category fact sheets.** Keep any HHW chemical category fact sheets that are available which are already included on the list; update the list as new fact sheets are added.
3. **Physical hazards fact sheets.** If Program staff exposures exceed the limits of the [OSHA noise standard](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.95), add noise to the list under physical hazards fact sheets. If noise limits are exceeded, this Program will also have a hearing conservation program. [Heat stress](https://www.osha.gov/emergency-preparedness/guides/heat-stress) is also listed on the Chemical and Physical Hazards list.

## 3.4 Fill out and post information notice

Complete and post RTK Information Notice (See Attachment A). This guide informs Program staff where to look for information.If the facility is already covered under an existing RTK program administered by the county or another employer, fill out Attachment A and file a copy of the county’s/employer’s RTK Program as an additional attachment to this SOP.

## 3.5 Labeling

The RTK coordinator must verify that all containers of chemicals purchased for use at the facility are clearly labeled in English with the following information:

* chemical’s identity (trade name)
* appropriate hazard warning (including target organ)

manufacturer’s name and address when an employee transfers a chemical into a secondary container, the container must be labeled with the identity of the product and a hazard warning. Labels are not required on immediate-use containers, pipes, or piping systems. However, the contents of pipes or piping systems must be described in the training session.

## 3.6 Provide employee training

The RTK coordinator must ensure that all Program staff are trained and kept current on information covered under the Programs [Hazard Communication](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200) Program. All new Program staff must receive basic RTK training prior to starting work with chemicals or physical agents, including:

* Hazardous Waste Operations and Emergency Response ([HAZWOPER](https://www.osha.gov/emergency-preparedness/hazardous-waste-operations/preparedness)) training. Program staff responsible for processing HHW must take the [MPCA sponsored](https://www.pca.state.mn.us/business-with-us/household-hazardous-waste-collection) OSHA Safety & Health Initial Training course (or equivalent training) once, then followed annually with refresher trainings.
* Location and overview of the [RTK Standard](https://www.osha.gov/hazcom) associated postings.
* Physical and health effects of the chemicals (HHW [chemical categories](https://www.osha.gov/chemicaldata/)) and physical agents, as applicable.
* How to read and interpret the information on labels, SDS, SOPs or other written protocol to reduce or prevent exposure to chemicals or physical agents.
* Methods and observation techniques used to determine the presence or release of chemicals in the work area.
* Techniques for reducing or preventing exposure to hazardous chemicals or physical agents by using good work practices, personal protective equipment, etc.
* Written protocol to reduce or prevent exposure to these chemicals or physical agents.

Emergency procedures to follow in the event of an accident or incident.

Information whenever a new chemical is introduced into a work area.

* Volunteers and return-to-work employees need basic RTK training depending on extent of chemical exposure

### 3.6.3 Document training

All [training](https://www.osha.gov/training) must be documented and performed prior to starting work, including:

* Specific chemical hazards they may be exposed to
* Protective safety measures or precautions to take to reduce or avoid exposure

Follow employer [Injury reporting requirements](https://www.osha.gov/recordkeeping)

## 3.7 Recordkeeping

### 3.7.1 Training records

The RTK coordinator or other designated person is responsible for maintaining the following training records:

* Attendance record for each training session, which must include the employee’s name and identification and/or job title. Attendance records must be maintained for at least 3 years.
* A training session record, which must include the date, trainer, summary/outline of contents of the training session, handouts, etc. Session records must be maintained for at least 3 years.

### 3.7.2 SDS records

The RTK coordinator is responsible for maintaining SDS records for all chemicals currently used in the facility. SDS are not required for household hazardous waste products collected by the facility. SDS are also not required for chemicals in the product exchange area of the facility. If these products are used by a HHW employee in a consumer-capacity, the product must be returned to the exchange room immediately after use. SDSs can be obtained either when purchasing chemicals or by searching the manufacturer’s website. Addition resources include:

1. [chemical toxicity](https://www.osha.gov/chemical-hazards)
2. [Minnesota Poison Center](https://mnpoison.org/): 1-800-222-1222
3. [Evaluating Hazardous Wastes](https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf)
4. [NIOSH Guide to Chemical Hazards](https://www.cdc.gov/niosh/npg/default.html)

Right-To-Know Information Notice

Please post

## General information

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is the RTK coordinator for this facility.

 (name/title of facility operator)

A copy of the RTK Program, available as Section 2.3 in the SOP manual, is located:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 (Location of SOP manual in facility)

## How to obtain information on HHW chemicals

### NON-EMERGENCY SITUATIONS:

* Household chemical category and physical hazards fact sheets, and SDS are available in the RTK/SDS

notebook located: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

* Contact the manufacturer by phone or on the Internet.
* Search the Internet for SDS:
	+ [www.hazard.com](http://www.hazard.com)
	+ [HHW Products Database](https://www.nlm.nih.gov/pubs/techbull/ja10/ja10_sis_reprint_household_prods.html)
	+ [Evaluating Hazardous Wastes](https://www.pca.state.mn.us/sites/default/files/w-hw1-01.pdf)
1. Contact the Minnesota Poison Center: [Minnesota Poison Center](https://mnpoison.org/): 1-800-222-1222.
* Refer to the NIOSH Pocket Guide to Chemical Hazards.

### EMERGENCIES: Dial 911

### (Note, if you need to dial additional numbers to obtain an outside line from your facility, change.

### The above entry, to Dial \_\_\_\_\_\_\_\_+ 911)

Chemical and Physical Hazards List

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|

|  |
| --- |
| **HHW Chemical Category Fact Sheets** |
| Carbon Monoxide |
| Corrosives and Irritants |
| Gases |
| Mercury |
| Particulates |
| Pesticides |
| Solvents and Solvent-based Products |

|  |
| --- |
| **Physical Hazards Fact Sheets** |
| Heat Stress |
|  |
|  |
|  |
|  |
|  |

**Safety Data Sheets (SDS)** |
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |