

# Logan Location Safety Notes



May 1995

## TRAINING REQUIREMENTS



Under OSHA and EPA guidelines, training is required in a number of areas. This training takes place (or should take place) anytime an employee is starting a new procedure or research project. OSHA adopted a new standard last year dealing with PPE (Personal Protective Equipment). Part of the requirements under this standard include making a risk assessment of the procedure or process, then selecting the appropriate PPE and training the employee to properly use it. A written record must be made of this and kept in either the employee's or supervisor's file. It is the supervisor's responsibility to assure this takes place.

The EPA has also adopted new standards dealing with pesticide applicators and any employee who may be exposed to pesticides while working. EPA has distributed to all state offices a worker communication package to aid in this training. In addition, a number of states have their own requirements for training and other areas. These requirements can be even more stringent than the federal

standards. Utah has recently passed legislation that requires all applicators to pass a test and be certified to apply pesticide(s).

In addition to these new areas of training, we are also required to provide both initial and refresher training on the OSHA Chemical Hygiene Standard and the Hazards Communication Standard (29 CFR 1910.1450 and 1910.1200, respectively). Each location (or laboratory) must have a written program covering these two standards. This area is one of the most often cited violations when OSHA inspects laboratories and other facilities. Records of the training (who conducted it, what was covered, when it occurred) must be kept indefinitely.

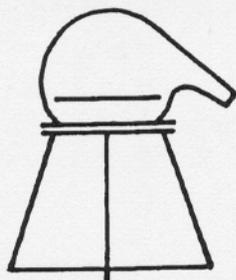


If you are required to wear a respirator, additional training is needed on selection, proper care and use, and maintenance of the equipment. A fit test must be performed every year to assure the respirator is truly protecting the wearer. Currently, USU Environmental

Health & Safety personnel perform the fit test for us.

A written plan for handling and disposing of hazardous materials is required. This can be incorporated as part of an over-all safety plan. The important thing is to document the training and all use and disposal of hazardous material.

Even after the hazardous waste has been consigned to a licensed company and removed from the facility, we (the USDA) can still be held responsible for it. There are several cases where waste has been abandoned by the company. If the EPA is able to identify who the original source was, the generator can be held liable to pay for any clean-up costs and for disposal costs once again.



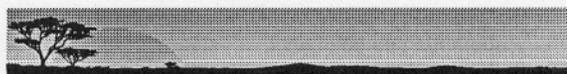
Working with certain chemicals or performing certain procedures also require annual training. The ARS Safety, Health, and Environmental Management Program Manual 230 and NPA Supplement to Manual 230 list specific training requirements for a variety of areas.

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So why is all of this training required? Many of these standards were originally written for industry where relatively few chemicals are used in much greater quantities than we use in the lab. Several groups have suggested that there be a revision of the standards where typical university and research laboratories (which use a wide variety of chemicals but in fairly small amounts) fall under one requirement and large-scale users fall under another. Until this happens, though, we must abide by all the rules and regulations. And these are constantly changing. This is why we often end up

offering training in areas where it hasn't been required before. Refresher training is designed to remind us of key items in all these areas: different chemicals require different types of PPE, one respirator is not good for all procedures, recordkeeping requirements are constantly changing.

And in addition to all of this training, more records are required: chemical inventories, MSDS (material safety data sheets) for all hazardous chemicals, and the list goes on!



## HANTAVIRUS UPDATE

Just a reminder as field work gets into full swing--wildlife surveys have shown that over 30% of the deer mice population are carrying the hantavirus. If you will be working in areas with mice or their droppings (plant collections, field trials, cleaning buildings), take a few basic precautions. Spray down the area with a disinfectant; wear appropriate respirators and gloves. USU has recently published hantavirus infection control recommendations; a copy of this bulletin should be posted in each research unit. Although hantavirus pulmonary syndrome is fairly rare (101 cases, 51 deaths in 19 states), take precautions. The two primary routes of exposure are through breathing dust from contaminated excreta or through a rodent bite. Another item to consider is that many rodents also carry the bacterium that causes plague; fleas on the rodent can transmit this to humans. Rodent control measures should include control of fleas.

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If you have questions or comments about safety concerns, please call me (Terrie Wierenga) at 752-2941.