

**Frequently Asked Questions about**  
**the OSHA Standard Occupational Exposure to Hazardous**  
**Chemicals in the Laboratory**  
**(29 CFR 1910.1450) and**  
**The Ohio State University's generic Chemical Hygiene Plan**

General Questions:

**Q: What are the ANSI Codes and how do we find copies?**

A: The ANSI codes are codes written by the American National Standards Institute and are used as references in the OSHA Laboratory Standard. They can be found in the university libraries or by contacting the Office of Environmental Health & Safety (as reference materials).

**Q: How does one ensure that Physical Facilities is doing their annual inspections and preventive maintenance?**

A: The Division of Physical Facilities is currently in the process of establishing new positions to fulfill the inspection and maintenance responsibilities mentioned in the CHP. Programs for fume hood evaluation and fire extinguisher inspection and maintenance have been established.

**Q: Many, even the majority of laboratories consist of 2-3 people. How should the CHP be administered in this situation? How does this affect position of a Chemical Hygiene Officer and/or laboratory inspection team?**

A: Each administrative unit should determine what is the best method for implementing the CHP and the OSHA Laboratory Standard in that area. For example, a unit might decide that each laboratory should have its own CHP and function independently. OR This document could be amended to apply to all the laboratories in a given department. OR The CHP could be administered from the college level. This decision is to be made by the administrative unit, so that specific circumstances like the one above can be addressed in the most appropriate manner.

**Q: Clarify the MSDS's - is the web okay? Are MSDS's needed only for the chemicals listed on the inventory starter list in Appendix A? Do labs need to keep an MSDS on the shelf for every chemical in the lab?**

A: The standard requires that MSDS's received from the chemical manufacturer be maintained on file as reference material for laboratory employees. This is separate from the requirements for the inventory. If an administrative unit wishes to establish a stricter requirement that an MSDS be present for each hazardous chemical in the laboratory, that is an acceptable choice. These materials maybe downloaded or referenced on the web, ONLY IF employees have access to the material and employee training ensures that the

employees are instructed on how and where to find the MSDS for each chemical specifically. It is NOT sufficient to train employees on how to do a web search.

**Q: At what level should this be implemented? The department? The individual lab?**

A: As mentioned above, this issue is at the discretion of the administrative unit.

**Q: How legal and binding is this document?**

A: The Chemical Hygiene Plan is required by the standard to be able to ensure the use of safe practices by laboratory employees. Therefore, on the one hand, the standard requires that the CHP include certain information as a minimum. On the other hand, everything that is included in the CHP, the University, the administrative unit, the Chemical Hygiene officer, the P.I., and the individual employee are legally bound to follow.

Specific Questions or Comments:

Section 3.0 - Hazardous Chemicals

**Q: In reference to OSHA's statement of what determines if a chemical is to be considered hazardous, we hope the rigor of the study is evaluated before we have to take more than ordinary precautions.**

A: Hazardous chemicals follow the same definition as in the Hazard Communication Standard. This definition is included in the generic CHP.

Section 4.0 - Responsibilities

**Q: Who is going to do all this stuff assigned to the Chemical Hygiene Office and the laboratory inspection team? Who are these people?**

A: The Chemical Hygiene Officer (CHO) or Chemical Hygiene Committee, are individuals designated by the administrative unit to fulfill certain duties required by the standard. These duties maybe delegated to other members in the lab (for example, a laboratory inspection team) by the CHP or the committee. Specifically who is in charge of seeing that the specific requirements of the CHP are completed is a decision to be made by the administrative unit.

Section 6.3 - Storage

**Q: Who pays for special storage equipment? Most labs can't afford them.**

A: Proper equipment is a cost of doing business. Funding for such items should be addressed through the budgeting process of the unit.