

Function of Beauty 5570 Snyderstown Rd. Paxinos, PA 17824

FUNCTION, INC

Chemical Hygiene Plan

29 CFR 1910.1450.

1. Introduction

- 1.1. This document describes the Chemical Hygiene Plan for Function of Beauty of NY, NJ, PA, MI as required by OSHA's Occupational Exposure to Hazardous Chemicals in Laboratories *Standard. 29CFR1910.1450.*
- 1.2. In order to comply with the Standard, Function of Beauty has established a plan to ensure our workplace is capable of protecting employees from Health Hazards associated with Hazardous Chemicals in the laboratory, and capable of keeping exposures below the Permissible Exposure Limits (PEL) specified in *29 CFR 1910 Subpart Z*. Questions regarding this plan should be directed to Joshua Lister/Edward Nolter
- 1.3. This plan is made readily available to the employees of Function of Beauty, employee representatives, & upon request by the Assistant Secretary for the Occupational Safety & Health Administration.
- 1.4. A review and evaluation of this program is conducted on an annual basis and updated as necessary.
- 1.5. The person responsible for implementation of this plan is the EHS Department. The assigned Chemical Hygiene Officer is Edward Nolter. This facility has established a Chemical Hygiene Committee comprised of the following personnel:
 - 1.5.1. Linda Foltis
 - 1.5.2. E. Nolter
 - 1.5.3. J. Brown
 - 1.5.4. R. Harrower
 - 1.5.5. J. Lister
 - 1.5.6. Neha Kharche
 - 1.5.7. Cara English
 - 1.5.8. Chiara Butler
 - 1.5.9. Ming Wang
 - 1.5.10. Van Nguyen

2. Standard Operating Procedures

- 2.1. For laboratory work at Function of Beauty which involves the use of Hazardous Chemicals, standard operating procedures (SOPs) have been addressed in order to reduce potential Safety and/or Health Hazards caused by such use. These procedures include various engineering control measures such as laboratory fume hoods.
- 2.2. Maintenance procedures for these engineering controls; include testing proper function of such equipment, the use of appropriate Personal Protective Equipment (PPE), and maintenance of such equipment.
- 2.3. The specific procedures implemented by Function of Beauty are as follows:
 - 2.3.1. Accident, spills
 - 2.3.2. Avoidance of routine exposure
 - 2.3.3. Choice of chemicals
 - 2.3.4. Eating, drinking, smoking, etc.
 - 2.3.5. Equipment and glassware
 - 2.3.6. Exiting
 - 2.3.7. Horseplay
 - 2.3.8. Personal housekeeping
 - 2.3.9. Personal protection
 - 2.3.10. Planning
 - 2.3.11. Unattended operations
 - 2.3.12. Use of hood
 - 2.3.13. Vigilance
 - 2.3.14. Waste disposal and storage
 - 2.3.15. Working alone
 - 2.3.16. Corrosive agents
 - 2.3.17. Electrically powered laboratory apparatus
 - 2.3.18. Fire, explosions
 - 2.3.19. Low temperature procedures
 - 2.3.20. Pressurized and vacuum operations
 - 2.3.21. Compressed gases
 - 2.3.22. Chemical Storage

3. Criteria for Use of Control Measures to Reduce Employee Exposure to Hazardous Chemicals

- 3.1. The Environmental Health & Safety Department makes an initial determination of employee's exposure to any substance regulated by an OSHA Standard (*29CFR1910.1001 through 29CFR1910.1050*) which requires monitoring if there is reason to believe exposure levels for substances routinely exceed the Action Level or in the absence of an Action Level, the Permissible Exposure Limit (PEL). If initial monitoring discloses employee exposure over the Action Level and/or Permissible Exposure Limit, exposure monitoring and cessation of monitoring shall be in accordance with the relevant OSHA Standard.
- 3.2. Function of Beauty notifies employees of exposure monitoring results in writing individually within fifteen **(15) working days** after receipt of monitoring results.

4. Control Measures

- 4.1. The following operations shall be performed in Laboratory Fume Hoods: As indicated.
- 4.2. The following operations shall be performed in Biological Safety Cabinets: As indicated
- 4.3. The following operations shall be performed in Glove Boxes: As indicated.

Chemical Hygiene Program

FOB-EHS-018

- 4.4. Where the use of respirators is determined to be necessary to maintain exposure below permissible limits, appropriate respiratory protection shall be provided at **no cost** to employees.
 - 4.5. Respirators shall be selected and used in accordance with the respiratory protection policy of Function of Beauty and with the requirements in *29CFR1910.134*. This policy and associated documentation is filed in PA, MI, NY, NJ for employee review.
 - 4.6. Appropriate protective apparel compatible with the required degree of protection for substances handled shall be used. Function of Beauty will advise employees on glove, gown, eye protection, barrier creams, etc. use. Permeability charts are available
 - 4.7. Employees will be instructed on the location and use of eye wash stations and safety showers. The EHS Department is responsible for this instruction.
 - 4.8. Employees will be trained at least annually on the use of fire extinguishers and other fire protection systems.
- 5. Maintenance of Fume Hoods & Other Protective Equipment**
- 5.1. Fume Hoods will be inspected every (3) Three months by the EHS Department, via an appropriately certified vendor, and will verify, not only the adequacy of face velocity determined by Vendor reports of hood inspections.
 - 5.2. Biological Safety Cabinet, Ventilation of Storage Cabinets, Interlock on High Voltage Equipment, Safety Showers, Eyewash Stations shall also be inspected as defined under the applicable regulatory standard.
- 6. Employee Information & Training Requirements**
- 6.1. Function of Beauty provides employees with information and training on hazardous chemicals in their work area, at the time of initial assignment, and prior to assignments involving new exposure situations to ensure employees are apprised of the hazards of chemicals present in their work area. Initial information and training sessions for new employees are conducted by the EHS Department.
 - 6.2. The following information is conveyed to employees:**
 - 6.3. The contents of the Occupational Exposure to Hazardous Chemicals in Laboratories Standard *29CFR1910.1450* and its appendices;
 - 6.4. The location and availability of the Chemical Hygiene Plan;
 - 6.5. The signs and symptoms associated with exposures to hazardous chemicals used in the laboratory;
 - 6.6. Information on OSHA permissible exposure limits (PELs) where they exist, and other recommended exposure limits; and
 - 6.7. Location and availability of known reference material on the hazards, safe handling, storage and disposal of hazardous chemicals found in the laboratory including, but not limited to, Safety Data Sheets (SDS) received from chemical suppliers.
 - 6.8. In addition to above information, employees are trained on the following:**

Chemical Hygiene Program

FOB-EHS-018

- 6.9. Methods & observations which may be used to detect the presence or release of a hazardous chemical in the work area (monitoring methods and devices, visual appearance, and/or odor, etc.);
- 6.10. The physical and health hazards of chemicals in laboratory work areas; and
- 6.11. The measures to protect employees from these hazards, including:
 - 6.11.1. Standard operating procedures
 - 6.11.2. Work practices
 - 6.11.3. Emergency procedures
 - 6.11.4. Personal protective equipment
 - 6.11.5. Details of the chemical hygiene plan.
- 6.12. The outline for the training material is located_____.
- 6.13. Edward Nolter is responsible for developing the standard operating procedures (SOPs).The EHS Department and respective laboratories are responsible for the portion of training on standard operating procedures.

7. Prior approval for Specific Laboratory Operations

- 7.1. Certain laboratory procedures which present a serious chemical hazard require prior approval by the *Function of Beauty EHS Department* before work can begin. For all facilities, these procedures include:
 - 7.1.1. Work with select carcinogens;
 - 7.1.2. Work with reproductive hazards;
 - 7.1.3. Work with neurotoxins; and
 - 7.1.4. Work with acutely hazardous chemicals
 - 7.1.5. Work with flammable/combustibles
 - 7.1.6. Work with Corrosives pH values 3-11
 - 7.1.7. Environmental impacts
 - 7.1.8. Work with dust combustible and respirable
 - 7.1.9. The chemicals include:

See SDS database
- 7.2. *Our laboratory does use chemicals which are sufficiently hazardous and require prior approval by the EHS department before they are used.*

8. Additional Protection for Work with Select Carcinogens, Reproductive Toxins, and Chemicals with Acute Toxicity

- 8.1. The following provisions shall be employed where appropriate:
- 8.2. Establishment of a designated area;
- 8.3. Use of containment devices such as fume hoods or glove boxes;
- 8.4. Procedures for safe removal of contaminated waste; and
- 8.5. Decontamination Procedures.

Chemical Hygiene Program

FOB-EHS-018

- 8.6. [Note that according to the standard, a **CARCINOGEN** means any substance which meets one of the following criteria:
- 8.6.1. (i) it is regulated by OSHA as a carcinogen; or
 - 8.6.2. (ii) it is listed under the category, “known to be carcinogens”, in the Annual Report on Carcinogens published by the National Toxicology Program (NTP) (latest edition); or
 - 8.6.3. (iii) it is listed under Group 1 (“carcinogenic to humans”) by the International Agency for Research on Cancer Monographs (IARC) (latest editions); or
 - 8.6.4. (iv) it is listed in either Group 2A or 2B by IARC or under the category, “reasonably anticipated to be carcinogens” by NTP, ...]

9. Medical Program

- 9.1. Function of Beauty provides all employees who work with hazardous chemicals an opportunity to receive medical attention, including any follow-up examinations which the examining physician determines to be necessary, for the following circumstances:
- 9.2. Whenever an employee develops signs or symptoms associated with a hazardous chemical to which the employee may have been exposed in the laboratory, the employee is provided an opportunity to receive an appropriate medical examination. The employee shall contact the Chemical Hygiene Officer to initiate the medical program.
- 9.3. Where exposure monitoring reveals an exposure routinely above the action level, or in the absence of an action level above the Permissible Exposure Limit (PEL), for an OSHA regulated substance for which there are exposure monitoring and medical surveillance requirements. Medical Surveillance shall be established for the affected employee as prescribed by the particular OSHA Standard. (Medical Surveillance & Exposure requirements as per 29CFR1910.1001 through 29CFR1910.1052)
- 9.4. Whenever an event takes place in the work area such as a spill, leak, explosion or other occurrence resulting in the likelihood of a hazardous chemical exposure, the affected employee(s) is provided an opportunity for a medical consultation. This consultation is for the purpose of determining the need for a medical examination. An appropriate medical examination is provided as necessary.
- 9.5. Currently our laboratory uses:
 - 9.5.1. Travelers Workers Compensation Panel providers
- 9.6. All medical examinations and consultations are:
 - 9.6.1. Performed by or under direct supervision of a licensed physician, are
 - 9.6.2. Provided at **NO COST** to employees without **LOSS OF PAY** and at a reasonable time and place.

10. Information Provided to Healthcare Professional

- 10.1. The EHS department or designee will provide the physician the following information:
- 10.2. The identity of hazardous chemical(s) to which the employee may have been exposed

Chemical Hygiene Program

FOB-EHS-018

- 10.3. A description of the conditions under which the exposure occurred; including quantitative exposure data, if available; and
- 10.4. A description of the signs and symptoms of exposure the employee is experiencing, if any.

11. Healthcare Professional's Written Opinion

- 11.1. A written opinion from the examining physician for a medical examination or consultation which is required by the Standard is obtained. This opinion shall include:
 - 11.2. Any recommendation for further medical follow-up;
 - 11.3. The results of the medical examination and any associated tests;
 - 11.4. Any medical condition that may be revealed in the course of the examination which may place the employee at increased risk as a result of exposure to a hazardous chemical found in the workplace; and
 - 11.5. A statement that the employee has been informed by the physician of the results of the consultation or medical examination and any medical condition that may require further examination or treatment.
- 11.6. The written opinion shall not include any findings/diagnoses which are not related to an occupational exposure.

12. Hazard Identification

- 12.1. With respect to labels and Safety Data Sheets (SDS), Function Inc assures labels on incoming containers of hazardous chemicals are not removed or defaced and Material Safety Data Sheets that are received with incoming shipments of hazardous chemicals are maintained and readily accessible to laboratory employees.
- 12.2. For chemical substances developed in the laboratory, the following procedures have been implemented for the following circumstances:
 - 12.2.1. For known composition for chemical substances produce exclusively for laboratory use which are determined to be hazardous, the appropriate training is provided at Employee Safety Orientation; *29 CFR 1910.134, 29 CFR 1910.1450, 29 CFR 1910.1200, ANSI Z358.1-2014, .*
 - 12.2.2. For unknown composition of chemicals produced as a byproduct, the substance is assumed to be hazardous and the appropriate standard procedures under Section (2) of this plan are implemented;
 - 12.2.3. For chemical substances produced for another user outside of the laboratory, MI and PA locations, process safety management (PSM) has been implemented with strict adherence to applicable OSHA standards including engineering and administrative controls.
- 12.3. Function Inc. complies with the Hazard Communication Standard 29CFR1910.1200, including the requirements of preparation of Material Safety Data Sheets and labeling.

13. Emergency Response

- 13.1. [There are two additional OSHA standards which interface with the Chemical Hygiene Plan; *CFR1910.38* Employee Emergency Plans and Fire Prevention Plans, and *1910.120(p) and (q)* Hazardous Waste Operations and Emergency Response (developed in response to SARA Title III).

14. Recordkeeping

- 14.1. Function of Beauty establishes and maintains for each employee an accurate record of any measurements taken to monitor employee exposure and any medical consultation and examinations including tests or written opinions as required by the Standard. These records are kept, transferred, and made available in accordance with *29CFR1910.20*, Access to Employee Exposure and Medical Records.