Health & Safety, Edinburgh Napier University

Guidance for Purchasing, Storage and Disposal of Hazardous Substances

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1. Introduction

The Control of Substances Hazardous to Health (COSHH) Regulations impose duties on the University to protect staff and any other persons, whether at work or not, who may be affected by the hazards of the University's work involving substances hazardous to health, including biological agents. The Regulations are not an optional extra, but must be an integral part of the work of the University.

The Regulations apply to all substances hazardous to health, not just to pure laboratory chemicals. Substances such as cleaning materials, construction materials, etc. are covered by the Regulations.

It is a requirement of the Regulations that an employer **shall not carry out any works** which are liable to expose any employees or others to any substance hazardous to health unless he has made a suitable and sufficient assessment of the risk created by that work to the health of those employees or others and of the steps that need to be taken to meet the requirements of these Regulations.

Each School/Service should establish a procedure for overseeing the requirements of the COSHH Regulations and Deans of School/Directors of Service will be responsible for putting in place procedures for the purchasing of hazardous chemicals. **These procedures should ensure excessive quantities are not purchased and appropriate storage, handling and disposal procedures are available within the School/Service.**

The list of substances defined by the Regulations as hazardous to health are included in the Classification, Labelling and Packaging of Chemicals Regulations.
http://www.legislation.gov.uk/uksi/2015/21/contents/made

The hazards of chemicals are communicated through signal words and pictograms on labels and safety data sheets.

New red framed pictograms replace the familiar orange danger symbols.

New terms have replaced old ones:

- Mixtures for preparations
- Hazardous for dangerous
- Pictograms for symbols
- Hazard statements for risk phrases
- Precautionary statements for safety phrases
- Signal Words (e.g. Danger, Warning) replace the Indications of Danger

However, for practical purposes, all substances should initially be considered but in many cases it will quickly become clear that the substances are not hazardous and hence no further assessment is required.

2. Guidelines for the establishment of purchase approval for hazardous substances

Each School/Service should ensure that:

1. All requests for approval of the purchase of a hazardous substance **(categories: highly toxic, carcinogens, mutagens, biological agents containment level 2 or above)** are accompanied by details of their hazards and their proposed use.
2. That these purchase requests are approved **by the School/Service Safety Committee and/or appointed competent person** who should advise the authorised person that there is not a safer alternative and ensure that excessive quantities are not purchased.
3. All approved requests for hazardous substances are countersigned by the Dean of School/Director of Service.
4. They are all logged onto the University Hazardous database which is a central inventory of all hazardous substances appropriately labelled, associated hazards, location and quantities and which can be made available in the event of an emergency situation.
5. Suitable and sufficient Risk, COSHH and DSEAR assessments must be carried out as required.
6. Establish a register of staff exposed to hazardous substances and ensure where required staff receive the relevant Health Surveillance. https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/policies/Documents/health-surveillance-summary-final.pdf
7. Suitable and sufficient information, instruction and training is available for all relevant staff and students.
8. All experiments involving toxic reagents, products and by-products, particularly when these are gaseous or volatile, should be carried out in an efficient fume cupboard so as not to endanger other nearby workers. If an efficient fume cupboard is not available, the experiment should not be carried out. Where work with very toxic chemicals is being planned, it is a requirement that the School/Service Safety Adviser be informed and other works in the same laboratory notified of the dangers.
9. Safe disposal procedures for all substances are available in each School/Service.

3. Safe storage of hazardous chemicals

The reception, storage and distribution of chemicals must be the responsibility of authorised persons only. Regulations governing the storage and labelling of toxic and other hazardous materials must always be observed. Very toxic chemicals, including chemicals with emotive names such as potassium cyanide etc., must always be kept in secure storage, access to which is available only to nominated key holders. Accurate records of chemicals issued from a secure store must be kept by a nominated person.

Liquids should never be placed on shelving above head height. Incompatible chemicals should not be stored in close proximity and in particular mineral acids and organic solvents should not be stored together. Individual workers should not retain chemicals superfluous to current needs and should return these to the chemical store or, if the materials cannot be used again, make arrangements for their safe disposal.

In order to minimise the risk of a serious laboratory fire, the maximum amount of flammable reagents and solvents etc. stored in any laboratory should not exceed 50 litres. This must be kept in suitable closed vessels, in fire resistant cupboards, cabinets or bins which may be constructed either of wood or steel. Stores for flammable solvents must be properly labelled and should not be sited adjacent to doors or other means of escape from the laboratory. Containers of flammable solvents should be returned to the storage cupboard, cabinet or bin as soon as possible after use. Reasonable quantities of flammable reagents and solvents may be kept in the open laboratory in suitable closed vessels of volume not greater than 500ml. These small quantities are excluded from the 50 litres storage limit suggested for each room.

Further detailed guidance is available https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/policies/Documents/Safe-Storage-of-Hazardous-Chemicals.pdf

4. Hazardous chemical disposal uplift

Schools/Services are responsible for ensuring that all hazardous waste material produced is properly labelled with the name of the substance and hazards associated with the substance, and placed in a suitable and appropriate container and stored safely until uplift.

All substances which cannot otherwise be disposed of in a safe and environmentally compliant manner must be disposed of through a recognised licensed contractor by the School/Service.