

# THE INCIDENT REPORT

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## ***THE DEC PAGE: Concealed Carry in Colleges*** - STEVEN STOEGER-MOORE, EXEC VP - DMI

In collaboration with our General Counsel, Michael Best & Friedrich, LLP, DMI has been examining several issues associated with the enactment of the Wisconsin Concealed Carry Law. Specifically the topic of posting signage is addressed below. As counsel points out, one of the significant parts of the law is the initial decision on whether or not to post a notice.

The new statute narrowly deals with the presence or prohibition against certain firearms and/or weapons on campus. DMI is advising that any posting should prohibit ALL other weapons that may not be otherwise address in the Concealed Carry statute (rifles, machine guns, switchblades, etc.) The College does not want to be limited to the specific definition relating to only concealed carry from the new statute.

At present, your College may have a current policy regarding weapons on campus (including your Student Code of Conduct). Such policies remain viable until the new law takes effect (November 1, 2011). The College is advised to continue to follow their current weapons policy until November 1, 2011. The College's policies may require stricter compliance than the new law will allow in some areas, e.g. parking lots.

A sample template notice written with minimal language and utilizing a "universal sign" designation was distributed to Members earlier this month. This is the signage being recommended by DMI and General Counsel for consideration for posting pending further direction from the Department of Justice. In our opinion this template sign adequately conveys the prohibition. This template does not require a person to read a great deal of verbiage to get the message. Additionally, the template can be readily translated\* for use with Spanish or Hmong (for example) speaking campus users. We would suggest that the notices be posted a minimum of one (1) week in advance of the effective date of the new law. With regard to posting and policy, the College should reserve the right to amend or modify these documents.

Please be aware that matters remain a bit fluid, since the adoption of regulation by the WI Department of Justice is ongoing.

To further aid our Members in planning for the impact of this legislation, DMI has scheduled a special DMI Presents...Wisconsin's Concealed Carry Law: How to Prepare for the Impact on Your College webinar for September 21, 2011 from 10:30 - 11:45 am. Presented by Michael Best and Friedrich, this webinar will be tailored to address the specific needs of the Technical College environment. Pre-registration is required to attend this NO-COST webinar. To register - please click [here](#) . Any advance questions for this webinar are due by the end of day, Thursday, September 15th. Please contact the DMI office if you have additional questions regarding this topic.



### **Quote of the Month**

**The harder the conflict, the more glorious the triumph.**

- Thomas Paine

**Insuring Risk - Sharing Rewards**



# BRIGHT IDEAS:

## Understanding Key Essentials of a Chemical Hygiene Plan

Tim Greene - Risk and Loss Control Consultant - DMI

If your College has a science lab, then having an up to date Chemical Hygiene Plan (CHP) is required. A CHP is a written document that lists the hazards that exist within labs; details

methods, procedures, devices, and equipment necessary for protection. Just like any other safety plan, your CHP is a living document that should be reviewed and revised often. A Chemical Hygiene Officer (CHO) should be designated to develop, review the CHP as well as provide training. A CHO should be someone who is knowledgeable in sciences and laboratory safety procedures. Here are some key items to include in your CHP:

### **Chemical Inventory & Storage**

It is essential to have an up-to-date chemical inventory that includes current MSDSs.

Establish a uniform labeling system, either using the NFPA (National Fire Protection Association) or HMIS (Hazardous Material Identification System).

Keep your storage rooms well organized and secured. Restrict who has access to this area. If possible, have one person responsible to maintain organization within the area.

Keep incompatible chemicals segregated. Provide containment for each of the shelves.

Develop an acquisition process for new chemicals. Determine the proper handling, storage and disposal (before a chemical is introduced).

### **Housekeeping**

Keep floors clean and dry...slips trips and falls are the number one cause of injuries for all of the Technical Colleges.

Keep absorbent materials on hand for quick clean up in areas where spills occur most frequently. Keep an appropriate waste receptacle nearby to minimize exposures.

Work to educate your custodial staff about proper waste disposal procedures.

Instruct lab users to NOT pour liquids down drains NOR use hoods to dispose of volatile chemicals.

### **Handling Spills**

Spills can be common occurrences - it is imperative that instructors and lab technicians know how to handle spills quickly and appropriately. Consider including spill response in the curriculum and establish practice drills with students periodically throughout the semester.

Spill response should include prevention, containment, ventilation, evacuation procedures, medical care procedures and reporting. Keep a spill kit readily accessible in each lab and storage room.

### **Lab Equipment/ Safety Equipment**

Using damaged equipment is as hazardous as using incorrect chemicals. This is especially important with glassware. Look for cracks and chips. Inspection of equipment prior to use should be part of the CHP Standard Operating Procedures

Consider using containment trays to assist in the control of spills.

Signs reinforce and remind lab users of safety procedures and other helpful information - use them.

Include a review of Safety Equipment in the curriculum and establish practice reviews periodically.

### **Air Quality**

Air quality can be compromised rapidly in labs. Review MSDSs to determine the appropriate type of ventilation necessary for the chemicals in use.

Exhaust hoods are vital pieces of equipment used to increase safety and reduce exposures. Hoods should have continuous monitoring devices to allow easy and quick confirmation of performance before use. Hoods must be tested and re-calibrated annually in order to ensure that they function properly. A certification label with the date and who certified each hood should be placed in a visible location.

### **Standard Operating Procedures**

Standard Operating Procedures (SOP) address the use of correct personal protective equipment, safe handling, use, and proper disposal of chemicals within a laboratory.

SOP's should also be written for proper use and care of laboratory and safety equipment.

Consider including these SOP's in the curriculum.

### **Training**

Training is probably the most important aspect of a CHP as it will assure your students and employees understand how to avoid unnecessary exposures and maintain a safe lab.

Training is required for all employees prior to working in the lab. Annual review of the CHP with employees is also a requirement.

Training should cover: location of the CHP; location of MSDSs and other safety literature; how personal protective equipment is chosen, where it is located, how to use it properly, how to inspect it and when to replace it; hazards presented by each chemical and the procedure in the lab; how to handle chemicals properly and to avoid exposure; how to read and label containers correctly; proper lab hygiene and conduct, (no eating or drinking in lab, securing loose hair and clothing, avoiding horseplay and "joking around", proper foot wear, etc); not permitting students to work in lab without an instructor or lab tech present; how to follow specific lab procedures for each experiment; how to handle waste materials.

If your college does not have a CHP, a template with a variety of training materials can be found on the KellerOnline website. Choose a Chemical Hygiene Officer and create a team to complete the task of creating an effective CHP. It is important to remember that when using a template, don't just fill in the blanks...make sure your plan is written to match your College' staffing, laboratory resources, chemical inventory, etc.

*Insuring Risk - Sharing Rewards*