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RIGHT-TO-KNOW HAZARD COMMUNICATION PROGRAM

GENERAL POLICY

The purpose of this program is to inform employees about Kenyon College's compliance with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200 (29CFR1910.1200). Kenyon has compiled a hazardous chemicals list, uses and maintains Material Safety Data Sheet (MSDS) hard copy and computerized databases, ensures that containers are correctly labeled and provides employees who may be exposed to hazardous substances with safety training. This program applies to all work operations where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

Copies of this written program may be obtained from the Office of Environmental Safety and from the department chairmen listed below.

PROGRAM OVERVIEW

Kenyon College is a private liberal arts college consisting of about 90 buildings and 900 acres of land. The College employs over 600 people, approximately one fifth of whom are working with hazardous materials. Kenyon's Right-to-Know Program will be coordinated by the Office of Environmental Safety, who will be responsible for the planning, administration and updating of the program as detailed in this plan. The Office of Environmental Safety is available as a resource for any member of the Kenyon community to assist in addressing safety concerns and in the implementation of this policy.

Each department chairman is responsible for the hazardous materials coming into the Department. The responsibility includes proper labeling, handling, storage and MSDS data for both the Department and master file. Chairmen will ensure that this program is implemented and safe work practices are followed in each department. Current department chairmen are as follows:

<u>Name</u>	<u>Department</u>
Greg Widener	Maintenance-Carpentry, Painting, Mechanical, Custodial
Marcella Hackbardt	Art
Timothy Sullivan	Physics

Karen Hicks	Biology
James Keller	Chemistry
George Kost	Storeroom
Greg Widener	Swimming Pool-Boiler Areas
Sarah K. Murnen	Psychology
Michael E. Knight	Printing Facility
Kim Cullers	Health and Counseling Center
Andrew Reinert	Drama
Steve Vaden	Grounds

All employees are responsible for using safe practices in their own work, using appropriate personal protective equipment and attending training sessions as required.

INVENTORY AND MATERIAL SAFETY DATA SHEETS

Hazardous materials are used and stored in the following areas on campus:

<u>Department</u>	<u>Building(s)</u>	<u>PBX</u>
Art Department	Mayer Art Center, Bexley Hall	5459
Biology Department	Higley Hall	5383
Boiler Areas	Maintenance Building, McBride Residence, Philip Mather Hall, Samuel Mather Hall, Caples Residence, Gund Commons, Ernst Center	5127
Carpenter Shop	Maintenance Building	5138
Custodial Areas	Maintenance Building	5106
Chemistry Department	Tomsich Hall	5092
Drama Department	Shaffer Speech Building	5531
Grounds Services	East Maintenance Building	5629
Health Service	Health and Counseling Center	5525
Mechanic Shop	East Maintenance Building	5133
Paint Shop	East Maintenance Building	5135
Physics Department	Hayes Hall	5069
Printing Services	104 Scott Lane	5251
Psychology Department	Samuel Mather Hall	5370
Storeroom	Maintenance Building	5131
Swimming Pool	102 Gaskin Ave	5868

A list of chemicals is on file in each academic department and maintenance area. A campus wide master MSDS file is located in Tomsich Hall, Rm 013 (Basement)

Most chemical suppliers send an MSDS with the initial order of a chemical or a short time after the chemical arrives. If the MSDS is not received within a reasonable amount of time, the Assistant Director of Chemical Laboratories will request one from the supplier. If necessary, The Director of EH&S will assist in pursuing delinquent suppliers. The Director will determine the need for securing MSDSs for household formulations.

MSDSs are to be kept in at least one location in each department listed, where they are accessible to all employees using the substance. It is the responsibility of the person(s) who orders chemicals in each department listed to send copies of all MSDSs received, including revised MSDSs, to the Teaching Laboratory Coordinator who will maintain the MSDS master file for the entire campus.

LABELING, STORAGE AND DISPOSAL

All chemicals arrive at Kenyon in correctly labeled containers, and repackaging into smaller containers will not be done unless necessary. If repackaging or label replacement does occur, the department chairman or his designee will be responsible for correct labeling by a department employee. Container labels should be checked for deterioration each time the container is removed from storage and the label replaced if needed. The minimum information required on any chemical container is clear identification of the substance (name and/or chemical formula) and a list of its hazards.

Labels must be updated when a revised MSDS is received from the manufacturer or distributor indicating changes in the information on the current label. If the revision does not affect the information on the label, no label change is required.

Chemicals must be stored according to classification and compatibility. Flammables, reactives, corrosives, toxics and general storage will have separate storage areas or cabinets. Incompatibility information is supplied on MSDSs and should be considered when storage areas are planned and location of specific chemicals is decided. Flammables are stored in double walled heavy steel cabinets that are grounded if possible. Corrosive chemicals are stored in nonmetallic cabinets. Many chemicals require refrigeration and are stored in units specially designed for that purpose. Storage of only minimum amounts of chemicals is encouraged.

Campus hazardous waste disposal occurs every six months and is coordinated by the Office of Environmental Safety. Representatives of the departments listed above bring wastes to the basement of Higley Hall during designated times. Toxics, organics and those having a pH above twelve or below two are separated from wastes that can be treated or diluted for disposal on campus. Those that require special disposal are appropriately packaged and labeled for hauling by employees of Chemical-Pack Services and are later hauled to their final destination by employees of Chemtron Corporation.

EMPLOYEE INFORMATION AND TRAINING POLICY

All employees who work with or may be exposed to hazardous chemicals, including temporary employees, will be trained according to the requirements of 29CFR1910.1200(e), about the potential hazards of those chemicals. These employees will receive an introduction to the OSHA Hazard Communication Standard and its training requirements. Included are an explanation of the required chemical labeling system and items listed in MSDSs. Employees are instructed in the use of hazard information supplied by these two sources for detection of chemical release, determination of kinds of injury possible from exposure to chemicals, development of work practices designed to prevent exposure, requesting personal protective equipment, identification of emergency and cleanup procedures.

OSHA required training is coordinated by the Office of Environmental Safety who will maintain records of those trained, date and type of training. Every attempt will be made to provide safety training to employees by their supervisor(s) and the Director before they begin working in the place where hazards may be present. As new hazardous materials are added to each department's inventory or before non-routine tasks that might allow exposure to new chemicals are to begin, supervisors will provide additional training. Reinforcement training will occur during safety meetings and through individual discussions with supervisors.

Formal lecture supplemented by the use of videos, overhead transparencies, handouts and discussion will be used to convey the required information. Group training sessions are routinely scheduled in September, January and June of each year. Individual training is done on an as needed basis.

ACCIDENT PREVENTION

The best approach to chemical detection and emergency response is to control the use of chemicals carefully and to prevent releases and exposures. Safe work practices and the use of personal protective equipment contribute to prevention of releases and exposures. Safe work practices are designed to prevent personal protective equipment from being tested to its limits by careful control of chemicals. Controls include use of minimum amounts of chemicals so only small amounts will be spilled or inhaled. Order will be maintained in work areas because clutter contributes to accidents. Engineering controls such as room ventilation exhaust fans and fume hoods will be available when MSDSs indicate they should be used. Careful manipulation of chemicals avoids splash and airborne dust, closing containers not in use prevents spills, reading MSDSs before beginning work with a chemical alerts workers to special handling needed for safely measures.

Personal protective equipment is used to protect the worker against exposure when handling of chemicals goes awry. Kenyon College will supply (but is not limited to) the following equipment:

- safety goggles
- face shields
- plastic aprons

gloves of assorted materials
respirators

When concerns arise about unlabeled pipe systems, employees are advised to call the Maintenance Department to determine the flow direction and contents of the pipes. Employees are instructed to vacate areas where pipes are broken or leaking until they are repaired by members of the Maintenance Department.

EMERGENCY RESPONSE

Most emergencies can be prevented by hazard awareness and review on the part of employees and their supervisors, but anyone who works with hazardous materials should know ahead of time what to do if something goes wrong. Kenyon provides emergency equipment: safety showers, eyewash fountains, fire extinguishers. Knowledge of their location and use is necessary. Knowing that MSDSs contain physical descriptions of chemicals is a valuable tool in the identification of a released chemical. Workers should be aware of the chemicals used in their work area and that dizziness, nausea and headaches can be indicators of chemical over exposure. Supervisors should be alerted in the case of an emergency and of suspected exposure. Knowing who to call in an emergency is imperative, and emergency phone numbers must be posted nearby.

EMERGENCY TELEPHONE NUMBERS

Primary Contact:

Safety Emergency Number, 5555
Office of Campus Safety, 5109 or 427-5109, 0 (Operator)

Secondary Contact:

Fire Department, 911

EITHER THE PRIMARY OR SECONDARY CONTACT WILL NOTIFY THE FOLLOWING PEOPLE:

- Gary Sweeney, Office of Emergency Management and Environmental Safety
5575, or After Hours, Campus Safety will make the call to home phone.
- Greg Widener, Supervisor of Buildings and Grounds
5828, or After Hours, Campus Safety will make the call to home phone.
- Brian Hess, Information Coordinator for Knox County Local Emergency
Planning Commission
393-6772

In the event of a fire, explosion or other major release, the Office of Campus Safety or the Office of Environmental Safety will call the National Response Center.

MEDICAL RECORDS

At this time, physical examinations are not required before employment. Kenyon College has not elected to do drug testing or repeated employment physicals.

CONTRACTOR POLICY

Outside contractors will be provided with all necessary information concerning the potential hazards of the substances a contractors' employees may encounter and appropriate protective measures required to minimize this exposure by the Superintendent of Buildings and Grounds. MSDSs will be made available to contractors by each department chairman in whose area contractor employees will work. If additional information is needed, the Director of EH&S will assist in locating proper documentation.

All outside contractors will make available a list of hazardous chemicals and MSDSs for those materials that their employees will be using on Kenyon College Property.

It is also Kenyon's policy that no hazardous material be introduced into the workplace by vendors, sales people, visitors or employees without providing the appropriate department chairman with a copy of the MSDS for the material.

EVALUATION OF PROGRAM EFFECTIVENESS

Kenyon College Hazard Communication Program will be updated and revised on an as need basis or at least annually. The Office of Environmental Safety will evaluate the need for program changes according to changes in personnel, College policy, training needs, accident and illness records, near miss and employee complaint records and OSHA regulations.