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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 Globally Harmonized Data Sheets (SDS) 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 Environmental Health and Safety Committee 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 Environmental Health and Safety Committee, who will be responsible for the planning, administration and updating of the program as detailed in this plan. The Environmental Health and Safety Committee 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 chair is responsible for the hazardous materials coming into the Department. The responsibility includes proper labeling, handling, storage and SDS data for both the Department and master file. Chairs will ensure that this program is implemented and safe work practices are followed in each department. Current department chairs are as follows:

|  |  |
| --- | --- |
| Name | Department |
| Steve Arnett | Maintenance-Carpentry, Painting, Mechanical, Custodial |
| Claudia Esslinger | Art |
| Tom Giblin | Physics |

Drew Kirkoff Biology John Hofferberth Chemistry Mike Itchner Storeroom

Steve Arnett Swimming Pool-Boiler Areas

Dana Kreig Psychology

Michael E. Knight Printing Facility

Chris Smith Health and Counseling Center

Balinda Craig-Quijada 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:

Department Building(s) PBX Art Department Horvitz Hall 5459

Biology Department Higley Hall 5383

Maintenance Building, McBride Residence, Philip

Boiler Areas

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 Farr Hall 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 SDS file is located in Tomsich Hall, Rm 013 (Basement)

Most chemical suppliers send an SDS with the initial order of a chemical or a short time after the chemical arrives. If the SDS is not received within a reasonable amount of time, the Laboratory Coordinator will request one from the supplier. If necessary, the Environmental Health and Safety Committee will assist in pursuing delinquent suppliers. The Committee will determine the need for securing SDSs for household formulations.

SDSs 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 SDSs received, including revised SDSs, to the Teaching Laboratory Coordinator who will maintain the SDS 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 SDS 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 SDSs 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 Environmental Health and Safety Committee. Representatives of the departments listed above bring wastes to the basement of Fishman 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 removal from campus.

**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 SDSs. 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 Environmental Health and Safety Committee 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 Committee 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. 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 SDSs 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 gloves of assorted materials

face shields respirators

plastic apron

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 SDSs 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, 740-427-5555

Office of Campus Safety, 740-427-5109 or 740-427-5000 Secondary Contact: Fire Department, 911

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

• Dudley Thomas, Environmental Health and Safety Specialist

740-427-5358, or After Hours, Campus Safety will make the call to home phone.

• Steve Arnett, Supervisor of Buildings and Grounds

740-427-5828, or After Hours, Campus Safety will make the call to home phone.

• Information Coordinator for Knox County Local Emergency

Planning Commission

740-393-6772 or 740-392-3557

In the event of a fire, explosion or other major release, the Office of Campus Safety or a member of the Environmental Health and Safety Committee 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. SDSs will be made available to contractors by each department chairman in whose area contractor employees will work.

All outside contractors will make available a list of hazardous chemicals and SDSs 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 SDS 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 Environmental Health and Safety Committee 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.

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