

**ADVISORY NO. 6.0: HAZARD COMMUNICATION STANDARDS /
RIGHT-TO-KNOW**

INTRODUCTION AND BACKGROUND

The University has adopted a Policy Statement on Safety and Environmental Health, which is consistent with compliance with the Hazard Communication Standard. That safety policy, found at OAC 3361:10-45-01, provides, in pertinent part:

It shall be the policy of the University of Cincinnati to provide a quality workplace environment for the learning experiences of teaching, education, work, patient care, and research which meets or exceeds applicable federal, state and local standards for health and safety. The University will adhere to practices, which meet or exceed applicable federal, state and local standards for the prevention of damage to or impact on the off-campus environment.

In conformance with this stated policy, the University has decided that it will voluntarily comply with the spirit of the OSHA Hazard Communication Standard, as modified to meet the specific conditions present at facilities operated by the University of Cincinnati.

This manual is intended to give a broad overview of the Hazard Communication Program for the University of Cincinnati. [UC specific questions concerning individual University facilities may arise which are not covered by the program]. In these situations, appropriate action to comply with the above stated University policy shall be determined on a case-by-case basis, after consultation between the affected department and the designated environmental/occupational health and safety division of the University which has responsibility for the oversight of this program.] Individual facilities that develop unique programs tailored to meet specific needs will, at a minimum, document any changes or additions to the University's Hazard Communication Program.

OVERVIEW OF HAZARD COMMUNICATION/RIGHT-TO-KNOW PROGRAM

This OSHA Hazard Communication/Right to Know Program ("Program") is implemented by the University of Cincinnati ("the University") to effect compliance with the spirit of the federal OSHA standard for hazard communication (29 CFR Part 1910.1200) (www.osha.gov/comp-links.html). The Program applies to operations of the University at its main campus, at branch campuses and any facilities, which are subject to the jurisdiction of the University.

The purpose of the Program is to communicate information concerning hazardous chemicals* used by the University to employees, students, faculty, firefighters, and the public. This information is transmitted through appropriate labeling of chemicals, training and education of employees, faculty and students, and retention of Material Safety Data Sheets (MSDS) for hazardous chemicals.

Implementation of this Program will be coordinated by Environmental Health & Safety (EH&S). The EH&S shall develop procedures for the retention of current MSDS, and appropriate container labeling. The EH&S and its appointed Training and Education Director shall have responsibility for developing procedures for informing employees, faculty and students about hazardous chemicals used in the workplace specific and in the educational and research setting. These personnel and their responsibilities are set forth in Section 8. These procedures, when adopted, shall be considered part of this Program.

LISTING OF HAZARDOUS CHEMICALS

This Section of the Program provides a mechanism for listing hazardous chemicals present in each defined University workplace and in discrete educational and research settings (here in after collectively referred to as "Work Areas"). Information in the listing is provided for the following:

Work Area:

Identifies the specific room or defined space in the workplace (or laboratory) where hazardous chemicals are produced or used, and where employees, faculty or students are present.

Chemical Name:

The scientific designation of a chemical is *. The term "hazardous chemical" is defined in 29 CFR 1910.1200(c) accordance with the nomenclature system developed by International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.

Common Name:

Any designation or identification such as a code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.

Where required, each hazardous chemical in the Work Area shall be identified on the container by chemical or common name. In some instances, a numerical code may be displayed on the container to identify its contents. The University shall maintain a copy of the Program and the MSDS in Environmental Health & Safety. Further information on each hazardous chemical noted can be obtained by reviewing the MSDS in the [Department or EH&S office]. The Program and the MSDS shall be accessible to all employees, faculty and students during each work shift (for employees) and during the normal hours of operation at the University when employees, faculty and students are in their Work Areas upon request to the [EH&S or Department] office.

UNIVERSITY OF CINCINNATI LISTING OF HAZARDOUS CHEMICALS
HAZARDS OF NON-ROUTINE TASKS

Prior to performing non-routine maintenance, each maintenance employee will be given information by his supervisor about hazards involved with these activities. This information will include:

- Specific chemical hazards;
- Protective/safety measures the employee can use;
- Measures the University has taken to reduce the hazards; and
- Emergency procedures.

No employee may begin work in confined space or any non-routine task without first receiving a safety briefing from his supervisor. The University has implemented a procedure for the issuance of permits for working in confined spaces and such permit must first be obtained from EH&S (556-4968) before such work may begin.

The University will provide information as part of its employee/faculty/student training program (Section 7) of the hazards of non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in the Work Areas. In situations where an employee/faculty member/student is assigned a task involving a hazardous chemical and this person has not previously received information concerning the hazardous chemical, the person assigning the task shall have responsibility for identifying the hazardous chemicals and allowing the employee/faculty member/student an opportunity to consult the MSDS for the hazardous chemical, if appropriate under the circumstances.

METHODS THE UNIVERSITY WILL USE TO INFORM EMPLOYEES OF HAZARDOUS CHEMICALS

Under certain circumstances, an outside contractor's employees could be performing services in a University Work Area where the contractor's employees may be exposed to hazardous chemicals. The Operations and Maintenance Department and Planning and Design Department shall be

notified by University personnel when a contractor's employees will be performing services in an area where such an exposure may occur. Contractors shall be responsible for training their employees concerning hazardous chemicals brought onto the job site by the Contractor.

It is the responsibility of the Operations and Maintenance Department and Planning and Design Department to make the following information available to contractor employers:

- Identification of hazardous chemicals to which they may be exposed while on the job site;
- Measures the contractor's employees may take to lessen the possibility of exposure;
- Steps the University has taken to lessen the risks;
- The location of MSDS's for all hazardous chemicals in the Work Area; and;
- Procedures to follow if they are exposed to hazardous chemicals.

The EH&S will coordinate with the Operations and Maintenance Department and Planning and Design Department (556-5200) to ensure that the contractor is given this information prior to entering the Work Area.

LABELS AND OTHER FORMS OF WARNING

The Purchasing Department shall select appropriate packaging for hazardous chemicals ordered for shipment to the University. The department receiving a shipment shall verify that all containers of hazardous chemicals received for use by the University will:

- Be clearly labeled as to identity (by chemical name, common name, or code); and
- Contain the appropriate hazard warnings (e.g., flammable, corrosive, combustible).

No containers will be released for use until the above data is verified.

MATERIAL SAFETY DATA SHEETS ("MSDS")

The Training and Education Director shall have responsibility for maintaining a copy of the MSDS. The MSDS's shall be kept in loose-leaf binders, arranged in a manner prominently described on the cover of each binder, and shall contain the information required by 29 CFR 1910.1200(g)(2), where available. The University intends to use and rely upon the MSDS supplied by each manufacturer, importer or distributor of hazardous chemicals. A copy of the Program and MSDS shall be kept in the EH&S department. The Program and MSDS shall be accessible to all employees/faculty/students during each work shift when employees, faculty and students are in their Work Areas, upon request to the EH&S department, or, during non-business hours, to the University Emergency Dispatch (telephone number 556-1111).

EMPLOYEE, FACULTY AND STUDENT INFORMATION AND TRAINING

The Training and Education Director shall have the responsibility for ensuring that information concerning hazardous chemicals in the Work Areas is disseminated to employees, faculty and students. The University's Training and Education Program will provide employees, faculty and students with the following information and training by requiring attendance at a safety class, which may be held on an informal basis and as part of a course curriculum, which will have information on:

Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area:

- The physical and health hazards of chemicals in the work area;
- The measures employees/faculty/students can take to protect themselves from these hazards, including emergency procedures and specific procedures the University has implemented to

protect them from exposure to hazardous chemicals;

- The details of the Program, including an explanation of the labeling system and the MSDS, and how employees/faculty/students can obtain and use the appropriate hazard information;
- The requirements of the Federal OSHA hazardous communication standard, as adopted by University policy;
- The operations in their work area where hazardous chemicals are present;
- The location and availability of the written Program, including the required list of hazardous chemicals and MSDS.

After attending the class/training, all employees, faculty and students will sign a form stating that they have received the training.

Before any new hazard is introduced into the Work Area, each employee, faculty member and student who may be exposed to the new hazard will be given information in the same manner as during an initial training session. Not every new chemical in the workplace/educational setting presents a new hazard, however. The Training and Education Director will be responsible for collecting the MSDS for the new chemicals. The Purchasing department shall forward all MSDS's received to the EH&S department.

Notices will be posted on bulletin boards that provide an explanation of the container labeling system and the location of the written Hazard Communication Program.

TASK DESCRIPTIONS FOR PERSONNEL IMPLEMENTING THE PROGRAM

EH&S Director

The EH&S Director has responsibility for the overall operation of the Program.

The specific responsibilities of the Director are:

- Keeping abreast of developments in the area of hazard communication;
- Amending the Program as needed;
- Reporting to the University's management of Program status and problems;
- Accompanying inspectors of federal, state and local enforcement agencies when on University grounds;
- Supervising the tasks of the EH&S department staff and the Training and Education Director.

Training and Education Director

The Training and Education Director has responsibility for the dissemination of information to employees/faculty/students concerning hazardous chemicals in the Work Areas. The Training and Education Director reports directly to the EH&S Director and has the following specific duties:

- Developing and implementing the information and training program described in Section 7;
- Developing and posting notices to employees/faculty/students of the availability of the Program, the list of hazardous chemicals and the MSDS;
- Scheduling employees for initial and periodic training sessions;
- Monitoring records of employee, faculty/student training/education;
- Ensuring that information concerning hazardous chemicals is being disseminated to employees, faculty and students;

- Collecting MSDS for every hazardous chemical in the Work Area;
- Ensuring that the MSDS contains the required information;
- Advising Contractors of their responsibilities to the University; and
- Advises the Operations and Maintenance department and Planning and Design department of information, which should be given to Contractors.