

# DUQUESNE UNIVERSITY

## HAZARD COMMUNICATION PROGRAM: EMPLOYEE RIGHT TO KNOW

*Effective June 1, 2002*

*Revised October 2008*

Prepared by: Environmental Health and Safety Department

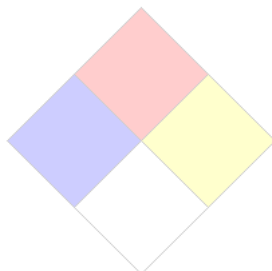
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### Record of Review/Changes

Date of Review	Changes	Signature
August 2007	Added reference to PA WCRTK Act and Appendix A and B.	Vanessa Fowler
October 2008	Added 3 properties on 5 <sup>th</sup> Avenue to Appendix A. "Program Coordinator" changed from EH&S director to EH&S Coordinator.	Vanessa Fowler

## **1.0 GENERAL UNIVERSITY POLICY**

The Environmental Health and Safety (EH&S) Coordinator is the program coordinator and has overall responsibility for the program. This program will be reviewed annually and updated when deemed necessary. Copies of the written program may be obtained from the EH&S Coordinator.

Under this program, University employees and students will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. University employees will also be informed of the hazards associated with non-routine tasks, such as the cleaning of vessels, and the hazards associated with chemicals in unlabeled pipes.

### Purpose

This written Hazard Communication Program is intended to inform faculty, staff, students and emergency response personnel about the hazardous substances that may be encountered at Duquesne University and the appropriate measures required for working safely with these substances. This Hazard Communication Program is intended to comply with the requirements set forth in the OSHA Hazard Communication Standard 29 CFR 1910.1200 and Part XIII of the Pennsylvania Worker and Community Right-to-Know Act.

### Applicability

This program applies to all work operations in the University where employees and students may be exposed to hazardous substances known to be present under normal working conditions, classroom/laboratory exercises, or during an emergency situation.

### Availability

This program is available to all Duquesne University employees and students or their representatives upon request. The written program is also available at the Right-To-Know Center on the 2<sup>nd</sup> floor of the Facilities Management and the EH&S Coordinator's office.

### Review and Assessment

This program will be reviewed at least annually and updated when deemed necessary.

## **2.0 RESPONSIBILITIES**

### Environmental Health and Safety

The EH&S Department is responsible for the overall administration of the Hazard Communication Program. EH&S will:

- Provide training to inform employees of special hazards, how to identify hazards and methods of mitigating those hazards.
- Provide workplace hazard analyses to determine level of risk and appropriate protection/guards.
- Provide access to MSDSs in each work area.
- Complete Hazardous Substance Survey Forms in compliance with state regulations.

### Supervisors

Supervisors and department heads shall ensure the timely completion of a chemical inventory of their areas on a yearly basis.

### Purchasers

“Purchasers” includes all individuals who purchase, receive and/or distribute chemicals. These persons are responsible for the receipt and proper distribution of Material Safety Data Sheets.

- *Purchasers* shall require MSDSs be provided by manufacturer’s or distributors for each shipment.
- *Receivers of packages to campus* shall attach copies of MSDSs to chemicals as they are distributed throughout campus. For example, if a pallet of window cleaner is being distributed to 6 different buildings, 6 copies of the MSDS should be made: one for each building. The original goes to the FM 2<sup>nd</sup> floor Right-to-Know Center.
- *Receivers of packages to buildings* shall collect incoming MSDSs and insert them into MSDS binder at that building’s Right-to-Know Center.

### Individual Users

“Individual users” refers to the actual users of chemicals on campus. These individuals are responsible for being aware of the locations of Right-to-Know Centers, how to use an MSDS, the hazards associated with their work tasks, how to identify hazards and the appropriate PPE and safety equipment available to them

## **3.0 MATERIAL SAFETY DATA SHEETS (MSDSs)**

MSDSs are fact sheets for all chemicals in the workplace. MSDSs provide University employees and students with specific information on the chemicals that are being used.

### Hazard Determination Procedure

#### *Materials Received*

Duquesne University will rely on hazard evaluations performed by the chemical manufacturers and importers of all chemicals purchased.

Material Safety Data Sheets (MSDSs) obtained from suppliers on all chemicals/substances purchased will be used in determining health and safety hazards of substances used at the University. If MSDSs are not properly completed or available for review, the chemical will not be used until the complete MSDS is obtained. The supplier and/or manufacturer must be contacted requesting the updated MSDS.

#### *Materials Produced*

Process mixtures prepared at Duquesne University will be assumed to present the same health hazards as each component of the mixture. The MSDSs of all components will be used in determining the hazards present.

If any of the components within a mixture are carcinogens, the mixture will be considered to be carcinogenic if the carcinogenic component is present in concentrations equal to or greater than 0.1%.

If any ingredient in the mixture is released in concentrations which would exceed the established OSHA Permissible Exposure Limit (PEL) or ACGIH Threshold Limit Value (TLV), the mixture will be assumed to present the same hazard as the component released.

The supervisor/manager of each process is responsible for determining the hazard of process mixtures. The Director, Safety Manager and/or the EH&S Coordinator may be contacted for assistance should questions or concerns arise.

### MSDS Maintenance

The supervisor/manager, dean, and/or department head of each department that utilizes any chemicals is responsible for obtaining and maintaining MSDSs for those chemicals. Supervisors/managers, deans and/or department heads will contact the chemical manufacturer or vendor if additional research is necessary. In addition, an updated copy of the MSDS must be provided to the EH&S Coordinator.

Supervisors/managers, deans, and/or department heads of each department will retain copies of the MSDSs used by their employees and/or students. These MSDSs will be available to all employees and students during working and classroom hours.

### Locations

English language versions of MSDSs corresponding to each building's inventory will be maintained in one or two central locations in each building. Those locations can be found in Appendix A.

### Missing MSDS

When an MSDS is needed, the chemical manufacturer or supplier will be contacted, via the phone or by writing, requesting an MSDS for that particular product/chemical necessary to complete a task. If the manufacturer or vendor does not supply the MSDS on the first request, the manufacturer or vendor will be requested again in writing. At this time, the requesting supervisor/manager will contact the EH&S Coordinator, who will then notify the local OSHA office.

## **4.0 CHEMICAL INVENTORY**

### Chemical Inventory List

All chemicals, hazardous or not, used at the University will be listed on a Chemical Inventory List for each building. Each department supervisor, dean, and/or department head is responsible for ensuring the Chemical Inventory List is updated and maintained for all chemicals used within his/her department.

Faculty, employees and students who come into contact with hazardous chemicals on the list need to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders; identification of others requires an actual inventory of the facility.

The supervisor/manager, deans, and department heads of each department throughout the University will be responsible for ensuring a list of all chemical substances used on-the-job by their employees or students is updated and maintained. This listing will be completed for all departments and updated when chemicals are discontinued and/or new chemicals are purchased. The supervisor/manager, dean, and/or department head of each department will provide the EH&S Coordinator with an updated list of all chemicals used and stored in the work area **every year**. This list will also identify chemicals that have been proven to be hazardous defined by the OSHA Hazard Communication Standard.

The chemicals from the following sources are to be considered hazardous.

- Any chemical listed in 29 CFR Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration (OSHA).
- Any chemical listed in Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH).
- Any chemical listed in the Annual Report on Carcinogens, National Toxicology Program (NTP).
- Any chemical listed in Monographs, International Agency for Research on Cancer (IARC).

The EH&S Coordinator can provide a list of these chemicals; links to these lists are also provided in section 9.0 of this document

#### Hazardous Substance Survey Form

An updated Hazardous Substances Survey (HSS) will be available to all employees at the Right-To-Know Center on the 2<sup>nd</sup> floor of the Facilities Management, the Safety Manager's office and the EH&S Coordinator's office. Building specific HSS Forms will be made available at each Right-to-Know Center in each building. An updated listing will also be made available to students during the handling of hazardous chemicals.

### **5.0 LABELS AND OTHER FORMS OF WARNING**

Supervisors/managers, deans and/or department heads will ensure that all chemical containers in their work area are properly labeled in English, are legible and prominently displayed though their sizes and colors can vary.. This includes both in-house and shipped containers.

#### Materials Received

It is Duquesne University's policy to require that suppliers/vendors of chemical products label those substances. At a minimum, the label on the containers of all substances shipped to the University shall contain:

- The identity of the material
- Appropriate hazard warnings
- Name and address of the manufacturer or importer

No container will be accepted unless it is properly labeled with the required information. General Stores in Mellon Hall and Receiving in Facilities Management are responsible for ensuring all chemical containers are properly labeled before releasing that substance to the department requesting it.

#### Portable/Temporary Containers

In-house transfer containers used at the University will be labeled with the following information:

- Identity of the material
- Appropriate hazard warnings

If employees/students transfer chemicals from a labeled container to a portable container and that chemical is intended only for IMMEDIATE use, no labels are required on the portable container. Under no circumstance will an unlabeled container be used when it is not intended for the chemical to be used immediately.

### Pipes/Piping Systems

A number of pipes and piping systems are labeled throughout the University and it is the University's ongoing objective to label all piping. Those pipes/piping systems not labeled will be described in training sessions.

### Stationary Containers

All stationary containers will be labeled with the following information:

- Identity of the material
- Appropriate hazard warnings
- Name and address of the chemical manufacturer

Supervisors/managers, deans, and/or department heads may use signs, placards, and process sheets, batch tickets or other written material instead of affixing labels to stationary chemical containers. If these methods are used, all required information will be present.

### Definitions

“Identity of the material”- The chemical identity is found on the label, the MSDS, and the chemical inventory. Therefore, the chemical identity links these three sources of information. The chemical identity used by the supplier may be a common or trade name, or a chemical name.

“Appropriate hazard warnings”- The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage").

“Other information”- Labels frequently contain other information, such as precautionary measures (i.e., "do not use near open flame"), but this information is provided voluntarily and is not required by the regulation.

## **6.0 INFORMATION AND TRAINING**

Information and training is a critical part of the hazard communication program. University employees and students who work with or are potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals. Department supervisors/managers, deans, department heads, and/or the Safety Manager/EH&S Coordinator will be responsible for conducting the training for his/her specific area. "Exposure" means "an employee/student is subjected to a hazardous chemical in the course of employment/training/classroom through any route of entry (inhalation, ingestion, skin contact or absorption) and includes potential (accidental or possible) exposure." Whenever a new hazard is introduced or existing hazards change, additional training will be provided.

Annual hazard communication training will be offered to employees through the EH&S Coordinator. New employees will be trained when they are assigned to work in areas involving hazardous chemicals. Students taking courses in which they may be in contact with chemicals and those conducting research that involves the use of chemicals will be trained on safety and safe laboratory practices by the instructor of the class or research.

### Training Format

The information phase of the program will inform employees and students of the following:

- The requirements of Employee Information and Training section under the standard.

- Operations/work areas where hazardous chemicals are present.
- How to obtain a copy of Duquesne University's Hazard Communication Program
- Location of the Hazardous Substance Survey and MSDSs

The training phase of the program emphasizes the following elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to MSDS information and what it means.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

## **7.0 HAZARDOUS NON-ROUTINE TASKS**

When employees are required to perform non-routine tasks that may have the potential to expose workers to hazardous chemicals, the supervisor/manager of each work area will inform employees of these hazards prior to starting the work. This information will be passed on to all employees and outside contractors performing the necessary, non-routine task.

## **8.0 ON-SITE CONTRACTORS**

All outside contractors performing services on University property will be made aware of any/all potentially hazardous materials which contracted employees may come into contact with. The supervisor/manager responsible for the area(s) in which the outside contractors are working will provide this information prior to start of work.

This will be accomplished by:

- Providing a list of all hazardous chemicals/substances within the area(s) the contractors are working.
- Providing the applicable Material Safety Data Sheets (MSDSs) for all hazardous chemicals/substances within the area(s) the contractors are working.

## 9.0 REFERENCES

OSHA Hazard Communication Standard 29CFR 1910.1200

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=standards&p\\_id=10099](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099)

Part XIII of the Pennsylvania Worker and Community Right-to-Know Act

<http://www.dli.state.pa.us/landi/lib/landi/laws-regulations%5Crtk%5Cr-18.pdf>

Hazardous Material Listings

OSHA's 29 CFR 1910.1000, table Z-1 through Z-3

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=9992](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9992)

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=9993](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9993)

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=9994](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9994)

Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, published by the American Conference of Governmental Industrial Hygienists (ACGIH)

(Not available online- available for purchase at: <http://www.acgih.org/home.htm>)

The Registry of Toxic Effects of Chemical Substances, published by the National Institute of Occupational Safety and Health

(Not available for free- Subscribe at: <http://grc.ntis.gov/rtecs.htm>)

## Appendix A: Locations of Right-to-Know Centers

#	Building		Central Location(s)
1	AD	Administration Building	Ground floor “housekeeping” closet
2	AJ	A.J. Palumbo Center	125
3	AN	St. Ann L/L Center	Denise Hink’s Office
4	AS	Assumption Hall	Ground floor housekeeping closet
5	BAY	Bayer Learning Center	100C
6	BH	Brottier Hall	Concourse Level Housekeeping office
7	CAH	Canevin Hall	Basement Mech. Room
8	COL	College Hall	501
9	DPC	Des Places Language Center	North basement
10	EC	Energy Center	2 <sup>nd</sup> floor main office
11	FG	Forbes Garage	<i>none</i>
12	FH-1	Fisher Hall	1 <sup>st</sup> floor housekeeping storage
	FH-2		1 <sup>st</sup> floor maintenance room by men’s restroom
	FH-3		Print Shop
13	FM	Facilities Management	2 <sup>nd</sup> floor hallway
14	GG	Grounds Garage	Office/Lounge
15	GL-1	Gumberg Library	1 <sup>st</sup> floor East- housekeeping closet
	GL-2		Basement Mech. Room
16	HL	Rangos Health Science Bldg	2 <sup>nd</sup> floor- housekeeping closet
17	LA	Law School	214
18	LAV	Laval House	<i>none</i>
19	LG	Locust Garage	<i>none</i>
20	MA	St. Martin Hall	Dennis Gapsky’s office
21	MC	Pappert School of Music	3 <sup>rd</sup> by 307
22	MD	Mendel Hall	B6
23	ME	Mellon Hall	S2
	PC	Power Center	2nd floor- housekeeping closet
24	PS	Public Safety	Housekeeping closet
25	RH-1	Rockwell Hall	1 <sup>st</sup> floor next to ladies restroom
	RH-2		Print Shop
26	ST	Student Union	3 <sup>rd</sup> floor work leader’s office
27	TA	Tamburitzan Building (+ garage)	2 <sup>nd</sup> floor “janitor” closet
28	TO	Towers L/L Center (+ Rooney Field house)	1st floor maintenance shop
29	TR	Trinity Hall (+ garage)	Basement housekeeping
30	VH	Vickroy Hall	1 <sup>st</sup> floor storage room
31		718 5th Avenue	
32		1000 5th Avenue	
33		1308 5th Avenue	

