



September 30, 1992

MEMORANDUM

TO: Deans, Directors, Chairs and Supervisors with Employees
Serving as Chemical Hygiene Officers

FROM: Robert M. D'Alessandri, M.D. *RMD*
Vice President for Health Sciences
Dean, School of Medicine

Herman Mertins, Jr., Ph.D. *HJM*
Vice President, Administration and Finance

William E. Vehse, Ph.D. *WV*
Provost and Vice President for Academic Affairs

RE: CHO Responsibilities

Effective January 31, 1991, West Virginia University adopted a Chemical Hygiene Program requiring departments that use chemicals in laboratories to appoint CHOs; inventory substances in the lab; train employees and students; provide protective clothing; etc.

All departments requiring CHOs have designated faculty and/or staff members as CHOs. Most departments have prepared written Chemical Hygiene Plans for the labs for which they are responsible. Written plans are being reviewed by Environmental Health and Safety for compliance with applicable OSHA standards. Environmental Health and Safety comments should be considered in the mandatory annual revisions to the written laboratory-specific chemical hygiene plan.

Several CHOs and the Chemical Hygiene Subcommittee of the University-wide Safety Committee have expressed some difficulties in the performance of their CHO responsibilities. Most of the expressed difficulties have focused on the lack of recognition of the duties of a CHO (1) for classification and pay purposes; (2) as "service" to the University and the department when performed by faculty and (3) as assigned responsibilities included in the job description when performed by staff. Other expressed difficulties of concern include lack of cooperation from faculty in updating chemical inventories and not requesting MSDS for labs.

Compliance with OSHA standards and WVU's Chemical Hygiene Program required many hours of work on chemical inventories, developing written plans, conducting lab safety audits, training users of the labs on the Chemical Hygiene Program, etc. CHOs should receive consideration (1) as part of the promotion and tenure process or (2) as part of the classification/compensation process.

Please support your CHOs in the performance of their responsibilities under West Virginia University's Chemical Hygiene Plan.

cc: Roger Pugh, Director, Health & Safety
Harold Harper, Special Assistant to Vice President, Health
Sciences
Steve Showers, Assistant Vice President, Facilities
Jon Reed, Executive Officer and General Counsel
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