

Northwestern

Hazard Communication

Environmental Health and Safety

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I. Purpose

This program establishes a process to ensure Northwestern faculty, staff, and students are aware of hazardous chemicals in the workplace and are provided with information regarding potential hazards of exposure to chemicals and any necessary protective measures to avoid exposure.

II. Scope

This program applies to all Northwestern faculty, staff, students, and contractors who have the potential for hazardous chemical exposure in non-research areas. The use of potentially hazardous chemicals in research laboratories is addressed in the [Laboratory Safety and Chemical Hygiene Plan \(LSCHP\)](#).

III. Responsibilities

A. Environmental Health and Safety (EHS)

- i. Serve as the Hazard Communication Program administrator in all non-research areas.
- ii. Provide annual hazard communication training to Hazard Communication Coordinators to assist in the interpretation and implementation of this program.
- iii. Assign [hazard communication training on myHR Learn](#) to non-research employees on an annual basis.
- iv. Provide technical advice when requested or needed to identify, evaluate, and control specific chemical hazards.
- v. Maintain the online safety data sheet (SDS) repository, manage SDS records, and approve access for Hazard Communication Coordinators.
- vi. Oversee the master chemical inventory, including managing each department's annual Chemical Inventory Certification.
- vii. Review and revise this program to reflect changes in regulatory requirements as necessary.

B. Department Heads/Managers/Supervisors

- i. Complete the [myHR Learn hazard communication training](#) and ensure training completion for all staff who may be exposed to a potentially hazardous chemical, including notifying EHS of new employees.
- ii. Assign Hazard Communication Coordinator responsibilities to designated faculty or staff (e.g., supervisory employees, managers, other designates) and confirm approximately 2 hours/month, department depending, is allotted for these responsibilities.

C. Hazard Communication Coordinators

- i. Complete the [myHR Learn hazard communication training](#).
- ii. Complete the Hazard Communication Coordinator Training.
- iii. Verify all hazardous chemical containers are correctly labeled (see **Section IV**).
- iv. Maintain the inventory of SDSs in the online SDS repository for all hazardous materials that require an SDS (see **Section V**).
- v. Instruct employees on how to safely handle hazardous chemicals before they begin working with potentially hazardous chemicals by reviewing SDSs with them.

- vi. If new chemicals are introduced into the workplace, or potential hazards change, ensure existing information, including the new versions of SDSs, and training are updated by submitting to EHS.
 - vii. If hazardous chemicals must be removed, coordinate their disposal with EHS and Heritage Environmental Services as outlined in the [Hazardous Waste Disposal Guide](#) or contact hazardous-waste@northwestern.edu with any questions.
 - viii. Inform contractors of chemical hazards by providing SDSs and communicating precautionary measures.
- D. Employees/Students**
- i. Handle hazardous chemicals in a safe and responsible manner as outlined on container labels, SDSs, and, if available, from established department standard operating procedures.
 - ii. Complete the [myHR Learn hazard communication training](#).
 - iii. Inform your supervisor or EHS of apparent or potential safety and health hazards.
- E. Contractors**
- i. Ensure chemical inventories and SDSs are readily available to department contacts upon request.
 - ii. Properly remove all unused and waste chemical products.

IV. Container Labeling Procedures

- A. All hazardous chemical containers must be clearly labeled, and the label must be legible and available in English.
- B. Depending on the intended use of the container, different requirements apply:
 - i. **Primary Containers:**
 - a. Manufacturers are required to label all containers; each department must recognize the manufacturer/supplier label as the primary means of labeling.
 - b. Labels must be affixed to the container and include: a product identifier (i.e., chemical name or common name on the SDS), [pictograms](#), a signal word, hazard and precautionary statements, and supplier identification (i.e., supplier or manufacturer's name, address, and telephone number).
 - ii. **Secondary Containers:**
 - a. If chemicals are transferred from the original shipping container to another container (e.g., spray bottle), a label must be affixed to the container that includes a product identifier (i.e., chemical name or common name on the SDS) and words, pictures, symbols, or combination thereof which provide at least general information regarding the physical and health hazards of the chemical.
 - b. The containers must be cleaned, the old label removed, and the new label affixed in its place.
 - iii. **Portable Containers:** A label is not required on a portable container intended for immediate use under the user's control.
- C. If needed, blank labels are provided by EHS.

- D. Empty containers are not to be re-used to store other materials, unless the container has been cleaned, old label removed, and a new label affixed in its place, including the same information as the original label. Approved containers must be used for the storage and handling of flammable or combustible substances.

V. Safety Data Sheets

- A. Northwestern's chemical inventory of SDSs is maintained in an [online repository hosted by M3V](#), which is accessible by faculty, staff, and students at all times via any device with access to the internet.
- B. EHS will:
 - i. Monitor the online SDS repository and approve submitted SDSs.
 - ii. Provide video tutorials on how to use the online SDS repository.
- C. Hazard Communication Coordinators will:
 - i. Maintain their chemical inventory update EHS with any changes so updated can be made in the online repository, M3V.
 - ii. Review the SDSs for new or significant health and safety information and forward the SDS on to their supervisor.
 - iii. Ensure affected faculty, staff, students, and contractors are informed of any new information documented on the SDS prior to their exposure to the chemical.
 - iv. Review their department's chemical inventory in the online SDS repository and submit a [Chemical Inventory Certification](#) annually to EHS. EHS should be notified immediately when there is a change in chemical inventory.
- D. Contractors can request and obtain access to relevant SDSs via their Northwestern host employee.

VI. Training

- A. All faculty, staff, and students who have the potential for hazardous chemical exposure will be provided and are to complete Hazard Communication training, which includes:
 - i. Methods and observations to detect the presence or release of a hazardous chemical in the work area (e.g., industrial hygiene monitoring, visual appearance or odor of hazardous chemicals),
 - ii. Hazards of chemicals on campus,
 - iii. Protective measures, including specific procedures and personal protective equipment, that will be taken in an effort to prevent hazardous chemical exposure, and
 - iv. Information on the location and details of the written hazard communication program, chemical inventory, and SDSs.
- B. Hazard Communication Coordinators should complete the [myHR Learn Hazard Communication training](#) and the Hazard Communication Coordinator training.
- C. Training for all faculty, staff, and students will be conducted annually and whenever a new physical or health hazard faculty, staff and students have not previously been trained on is introduced into their work area.
- D. Hazard Communication Coordinator training will be conducted annually.
- E. A [written tutorial](#) and [video tutorial](#) on use of the online database, M3V, can be viewed on the EHS website.

VII. Recordkeeping

- A. Unless hazardous chemicals or operating processes change, this program will be reviewed every 3 years by EHS.
- B. Training records of employees in non-research areas will be maintained by myHR Learn.
- C. Each department will complete the Chemical Inventory Annual Certification and submit to EHS for review.
- D. A Chemical Inventory List, including each material's name, manufacturer, hazardous substance(s), location, and date of use, will be maintained for at least 30 years after final use.

VIII. Regulatory Authority

Northwestern and contractors will comply with the Occupational Safety and Health Administration's (OSHA) standards and any other applicable codes and standards, including:

[OSHA 29 CFR 1910.1200 – Hazard Communication](#)

[OSHA 29 CFR 1910.1020 – Access to Employee Exposure and Medical Records](#)

IX. Contact

For questions, contact Environmental Health and Safety at ehs@northwestern.edu.