Northwestern
Hazard Communication Program
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I. Program Goals and Objectives

The purpose of this program is to ensure Northwestern employees are aware of hazardous chemicals in the workplace and are provided information regarding the potential hazards associated with exposure to chemicals, and any necessary protective measures to avoid exposure.

II. Scope and Application

This program applies to all Northwestern University faculty, staff, 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).

Risk Management Services is the Hazard Communication Program Administrator for all non-research areas, which include, but are not limited to, the following departments:

- Art Theory & Practice
- Athletics
- Facilities Management
- Logistics
- Risk Management Services
- Student Health Insurance
- Virginia Wadsworth Wirtz Center for the Performing Arts

III. Regulatory Authority and Related Information


IV. Responsibilities

A. Risk Management Services

Serve as the Hazard Communication Program Administrator:

1. Oversee the development and implementation of the Hazard Communication Program.
2. Provide training to assist in the interpretation and implementation of this program.
3. Provide technical advice when requested or needed to identify, evaluate, and control specific chemical hazards.
4. Maintain the online safety data sheet (SDS) repository (mSDSonline®) to manage records, and approve Hazard Communication Coordinator’s access.
5. Review and revise this program to reflect changes in regulatory requirements as necessary.

B. Department Heads/Managers/Supervisors

1. Complete the online hazard communication training module, assign training to new employees prior to handling potentially hazardous chemicals, and ensure training completion for all staff who may be exposed to a potentially hazardous chemical.
2. Assign Hazard Communication Coordinator responsibilities to designated faculty or staff and confirm approximately 2 hours/month, department depending, is allotted for these responsibilities.

C. Hazard Communication Coordinator
   1. Each department will designate supervisory employees, managers, or other designates to verify:
      i. All hazardous chemical containers are correctly labeled (see Section V.A. for more information).
      ii. SDSs are added to and maintained on mSDSOnline®, and SDS availability and instruction to employees on how to safely handle hazardous chemicals before they begin working with potentially hazardous chemicals.
      iii. A current inventory is maintained of all potentially hazardous chemicals stored and used in areas of responsibility.
      iv. If new chemicals are introduced into the workplace, or potential hazards change, ensure existing information and training are updated.
      v. Contractors are informed of chemical hazards by providing SDSs and communicating precautionary measures.

D. Employees
   1. Safely handle hazardous chemicals in a safe and responsible manner according to information available from container labels and SDSs, and if available, from established department standard operating procedures (SOPs).
   2. Complete the online hazard communication training module.
   3. Inform supervisor or Risk Management Services of apparent or potential safety and health hazards.

E. Contractors
   1. Ensure chemical inventories and SDSs are readily available upon request.
   2. Properly remove all unused and waste chemical products.

V. Program Requirements

A. Container Labeling Procedures
   1. The Hazard Communication Coordinator will verify all hazardous chemical containers are clearly labeled, including: the name of the chemical (or common name on the SDS), the contents, the chemical manufacturer’s name, address, telephone number, signal word, hazard statement, pictogram, precautionary statements, and appropriate hazard warning, according to the following:
      i. Primary Containers: Manufacturers are required to label all containers; each department must recognize the manufacturer/supplier label as the primary means of labeling.
ii. **Secondary Containers:**
   a. If chemicals are transferred from the original shipping container to another container (i.e. spray bottle), a label must be affixed to the container that includes the name of the chemical, and words, pictures, symbols or combination of 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 user’s control.

2. If needed, blank labels are provided by Risk Management Services in 2020 Ridge Ave, Suite 240.

Empty containers are not to be re-used to store other materials unless the container has been cleaned, the old label removed, and a new label affixed in its place, including the same information as the original label.

B. **Safety Data Sheets (SDSs)**

1. The Hazard Communication Program Administrator will establish and monitor mSDSOnline®, and approve submitted SDSs.

2. The Hazard Communication Coordinator will obtain the necessary SDSs for all hazardous chemicals used in their department by employees or contractors and update mSDSOnline® as new hazardous chemicals are received. This designated employee will review the SDSs for new or significant health and safety information, and forward the SDS on to their supervisor.

3. The Hazard Communication Coordinator will ensure that affected employees and contractors are informed of any new information documented on the SDS prior to their exposure to the chemical. SDSs are available by means of either:
   a. access to mSDSOnline®, or
   b. supervisors will provide access.

VI. **Training**

All faculty and staff who have the potential for hazardous chemical exposure will be provided and are to complete Hazard Communication training, which includes:

A. Methods and observations to detect the presence or release of a hazardous chemical in the work area (i.e. industrial hygiene monitoring, visual appearance or odor of hazardous chemicals).

B. Hazards of chemicals on campus.

C. Protective measures, including specific procedures and personal protective equipment, will be taken in an effort to prevent hazardous chemical exposure.

D. Details of the written hazard communication program.
Hazard Communication: Right to Understand (GHS) training will be assigned to all non-research employees via myHR Learn by their supervisor prior to handling potentially hazardous chemicals and whenever a new chemical hazard is introduced into the work area.

VII. Recordkeeping

A. Unless hazardous chemicals or operating processes change, this program will be reviewed every 3 years by Risk Management Services.
B. Training records of employees in non-research areas will be maintained by myHR Learn.

VIII. Contact

For questions, contact the following:

Risk Management Services
Gwen Butler – Director, Environmental Health & Safety
gwen.butler@northwestern.edu
847-491-4936