

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
- Logistics
- Risk Management
- Student Health Insurance
- Virginia Wadsworth Wirtz Center for the Performing Arts

III. Regulatory Authority and Related Information

29 Code of Federal Regulations (CFR) Part 1910.1200, Hazard Communication

29 CFR Part 1910.1020, Access to Employee Exposure and Medical Records

IV. Responsibilities

A. Risk Management

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 to manage records and approve employee access
5. Oversee master chemical inventory, including managing annual certifications of each department's chemical inventory
6. 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 an online repository, 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 (see Appendix B for a chemical inventory template)
 - 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 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 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 monitor the online SDS repository 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 the online SDS repository 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.

4. SDSs are always accessible and available to employees via access to the online SDS repository. In the event of a power outage and no internet access, the SDS repository is also available on a USB flash drive that is accessible and available to employees via Risk Management.
5. Contractors can request and obtain access to relevant SDSs via their Northwestern host employee.

C. Chemical Inventory

1. The Hazard Communication Program Administrator will monitor the master chemical inventory.
2. The Hazard Communication Coordinator will establish a chemical inventory for their department within the online SDS repository and update it as new hazardous materials are received and obsolete materials are removed from use. See Appendix B for a chemical inventory template.
3. The Hazard Communication Coordinator will review their department's chemical inventory annually and submit certification to Risk Management. See Appendix A for Annual Chemical Inventory Certification.
4. Chemical inventories are always accessible and available to employees via access to the online repository. In the event of a power outage and no internet access, chemical inventories are also available on a USB flash drive that is accessible and available to employees via Risk Management.
5. Contractors can request and obtain access to relevant chemical inventories via their Northwestern host employee.

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.** Information on the location and details of the written hazard communication program, chemical inventory, and SDSs.

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.
- 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 in Appendix A and submit to Risk Management 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. Contact

For questions, contact the following:

Risk Management

Gwen Butler – Director, Environmental Health & Safety

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847-491-4936

Appendix A Annual Chemical Inventory Certification

All Northwestern University non-research departments in which there is potential for hazardous chemical exposure must review their chemical inventories and submit to Risk Management on an annual basis. This ensures hazardous chemical information is routinely updated in accordance to 29 Code of Federal Regulations (CFR) Part 1910.1200, Hazard Communication.

To ensure accuracy of and availability to safety data sheets (SDSs) and chemical inventories, Hazard Communication Coordinators must complete the following:

1. Complete an inventory of all hazardous materials currently used within your department. Review and if necessary, update or revise, the online SDS inventory currently on file.
2. Attach copies of all SDSs for each hazardous material on the inventory list that has been changed, updated, or amended. Also, please include an SDS for all materials that do not appear on the SDS inventory list but have been added to your Department's inventory.
3. Locate SDSs by contacting the manufacturer.

To ensure your department is in compliance, complete the applicable choice below and submit to Risk Management for review:

- There is no change to our Department's Chemical Inventory list, including SDSs.
- There are additions to the list; if so, attach revised Chemical Inventory indicating added materials.
- There are deletions from the list; if so, attach revised Chemical Inventory indicating deleted materials.

I verify that the above checked statement(s) is/are accurate and true to the best of my knowledge.

Department: _____ **Department Supervisor:** _____

Hazard Communication Coordinator: _____ **Signature:** _____

Date: _____

Upon completion, submit to Risk Management no later than May 1 of each year.

