



NORTHWESTERN
UNIVERSITY

Responsible University Official: Michael Blayney
Responsible Office: Office for Research Safety
Origination Date: 2008

Hazard Communication Program

Program Statement

The use of potentially hazardous chemicals is necessary in operating and maintaining an educational institution and in science teaching and research. Recognizing that the use of potentially hazardous chemicals poses risks to people and the environment, Northwestern University is committed to responsibility in the purchase, storage, use, and disposal of all chemicals. To achieve this goal, the Northwestern University Hazard Communication Program (HCP) provides a framework and set of guiding principles on chemical safety.

The HCP complies with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) [29 CFR 1910.1200]

Additional licensing requirements beyond the scope of this program may apply to possession or use of regulated chemicals such as pesticides, drugs, and Chemicals of Interest.

Reason for Program/Purpose

The purpose of this program is to reduce and control the risks associated with the use of potentially hazardous chemicals to Northwestern University employees, the community and the environment. This written program outlines the information, services, and training available at Northwestern University on the safe use, handling, storage, and disposal of potentially hazardous chemicals.

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Who Approved This Program

Laboratory and Chemical Safety Committee
Jay Walsh, VP of Research
Michael Blayney, Office for Research Safety
Chris Johnson, Risk Management
Ron Naylor, Facilities Management

Who Needs to Know This Program

This program applies to all Northwestern University employees, facilities, and properties. In addition, it applies to all contract personnel working on behalf of the University.

Website Address for this Program

TBD

Contacts

If you have any questions on the program or procedure for Hazard Communication Program, you may:

1. Call the Office for Research Safety at (847)-491-5581, or
2. Send an e-mail to researchsafety@northwestern.edu

Definitions

Labels	Under the Globally Harmonized System (GHS) and HCS, chemical manufacturers, distributors, and importers are required to use labels that include the following: product identifier, signal word, pictogram, hazard statement, precautionary statement, and supplier information.
	For stock solutions or other in-house mixtures, the person using the chemical is responsible for proper labeling of all secondary containers. The

in-house label must include:

- Commonly Accepted Name or Chemical Formula
- Special Warnings
- Date Made

Note: A portable chemical container filled from a labeled container does not have to be labeled if the employee will be using it immediately or during his/her work shift.

Safety Data Sheets (SDSs) HCS requires that chemical manufacturers, distributors, and importers develop SDSs for all potentially hazardous chemicals. SDSs contain more detailed information on the chemical, how to handle it and proper waste disposal.

At Northwestern University, SDS are readily available on a web hosted system MSDSONline®. It can be accessed through the ORS or Northwestern University library website from any computer on the Northwestern University domain.

In an emergency, Northwestern University Employees can call 1-888-362-7416 to request a faxed copy of a SDS.

Hazardous Chemicals A hazardous chemical, as defined by the HCS, is any chemical that can cause a physical or a health hazard. For the identification of hazardous chemicals, attention should be given to the quantity of the chemical used, the physical properties of the chemical, the potency and toxicity of the chemical (both acute and chronic), the way in which the chemical is used, and the available controls (engineering, PPE, etc.)

Program/Procedures

The HCP consists of three key components:

- (1) The identification of hazardous chemicals;
- (2) the availability and maintenance of labels and SDS, and
- (3) employee training.

Responsibilities of the Non-Laboratory Supervisor

- Conduct an initial evaluation of his or her areas and activities to determine the presence of chemicals that possess potential health and physical hazards and the applicability of the HCP to areas of responsibility.
- Collect and organize required information on hazardous chemicals and ensure its availability to his or her employees working with potentially hazardous chemicals. Ensure availability and access to Safety Data Sheets (SDSs)
- Complete the web-based training module on hazard communication. Ensure that all staff who work with or may be exposed to potentially hazardous chemicals do the same.
- Provide oversight in controlling exposure(s) to potentially hazardous chemicals by establishing standard operation procedures (SOPs) and coordinating medical consultation as needed.
- SOPs must:
 1. Ensure proper labeling of chemical containers
 2. Outline the requirements for the use of available engineering controls and PPE (i.e., ventilation, process enclosures)
 3. Consider and control exposures that may affect nearby work areas through planning and prior notification

Responsibilities of the Laboratory Supervisor or Principal Investigator

The use of potentially hazardous chemicals in teaching and research is addressed in the Northwestern University Laboratory Safety and Chemical Hygiene Plan (LSCHP). Compliance with LSCHP and associated safety training programs fulfills the hazard communication requirements for laboratory workers.

Responsibilities of Each Employee

- Conducting his or her work in a safe and responsible manner according to established SOPs and information available from container labels and SDSs.
- Participating in hazard communication training.
- Using safe work practices, engineering controls, and personal protective equipment.
- Protecting others by considering how exposure may affect nearby work areas.
- Protecting the environment by following established waste disposal practices.
- Informing their supervisor and/or ORS of apparent or potential safety and health hazards.

Responsibilities of Contractors and Facilities Project Managers

- Before beginning work for Northwestern University, contractors are required to provide the Project Manager with access to SDSs for all hazardous chemicals to be used.
- The Facilities Project Manager is responsible for reviewing the list of hazardous chemicals and SDSs to identify chemicals that may pose potential problems and for planning and coordinating advance notification of areas that may be affected.
- The contractor is required to post signs, barricades and other forms of warning while chemicals are in use or storage. The Facilities Project Manager is responsible for ensuring that the contractor(s) take reasonable and prudent precautions when using chemicals--such as ventilation, off-hours scheduling, etc. The Facilities Project Manager is also responsible for ensuring that the contractor removes all their unused and waste chemical products.

Responsibilities of Office for Research Safety (ORS)

- Overseeing the development and implementation of the HCP at institutional and departmental levels.
- Providing training content to assist departments and supervisors in the interpretation and implementation of the program.
- Providing technical advice when requested or needed to identify, evaluate and control specific chemical hazards.
- Making recommendations on resource commitments necessary to ensure the viability of the program.
- Maintaining the MSDSONline® platform of SDS records.

Program Evaluation:

This program will undergo an audit and update every three years

Forms/Instructions

Hazard Information at the Work Site:

For non-laboratory areas, an inventory of hazardous chemicals must be prepared and maintained. Supervisors must inform employees of this inventory, its location, and the method for obtaining SDSs for these chemicals.

Employee Training and Information:

ORS provides a web based training module on the essential concepts in hazard communication. Additionally, ORS provides a variety of regulatory training that encompasses hazard communication as part of the curriculum. ORS is available to provide specialized or unique training as needs are identified.

In addition to the training provided by ORS, the supervisor or qualified designee must provide instruction and information specific to the employee's responsibilities and assigned tasks before they begin working with potentially hazardous chemicals. The information provided to the employee must be specific--based on established SOPs--and appropriate for the needs of the individual(s). As new chemicals are introduced into the workplace, or potential hazards change, the supervisor is responsible for ensuring that existing information and training be updated to reflect these changes.

Appendices

Related Information

<http://www.osha.gov/dsg/hazcom/whatishazcom.html>

History/Revision Dates

Origination Date: 2008

Last Amended Date: September 27, 2013

Next Review Date: Month, Day, Year