

<b>Volume E2:</b> Environment, Health, Safety and Security	<b>E2.2</b> <b>Hazard Communication Program</b>  <b>Effective Date:</b> 10/01/2013 <b>Last Revised:</b> 10/20/2020 <b>Date of Next Full Review:</b> 10/01/2025	<b>Responsible Office:</b> Safety Program
	<b>Responsible Officer:</b> Safety/ Environmental Associate	

## POLICY STATEMENT

Information concerning the particular hazards that may be posed, and the methods by which faculty and staff can use hazardous materials in a safe and healthful manner are made available to all who use hazardous materials in their Northeastern Illinois University workplace.

## PURPOSE OF THE POLICY

The purpose of this policy is to implement 820 ILCS 255 (Toxic Substances Disclosure to Employee Act) (often called the Illinois Right-To-Know Law) by providing information on the hazards of the materials used in the workplace, and how injuries and illnesses potentially caused by those materials can be reduced. The program consists of three elements:

- 1.) Maintaining files of all hazardous materials lists and corresponding Safety Data Sheets (SDSs).
- 2.) Labeling, placarding and/ or providing signage to identify all hazardous materials in the workplace.
- 3.) Training all employees with potential exposure to hazardous materials within their job duties.

## WHO IS AFFECTED BY THIS POLICY

All Northeastern Illinois University faculty, staff, and student workers, and associated contractors working with hazardous materials on any NEIU property.

## DEFINITIONS

**Hazardous material:** Any chemical classified as a physical hazard or health hazard, a simple asphyxiant combustible dust, pyrophoric gas, or hazard not otherwise classified.

## REGULATIONS

[820 Illinois Compiled Statutes 255 \(Toxic Substances Disclosure to Employee Act\)](#)  
[OSHA 29 CFR 1910.1200, "Hazard Communication Standard"](#)  
[Illinois Emergency Planning and Community Right to Know Act](#)

In accordance with 820 Illinois Compiled Statutes 255 (Toxic Substances Disclosure to Employee Act) and the Occupational Safety and Health Administration (OSHA), "Hazard Communication Standard" in 29 CFR 1910.1200, Northeastern Illinois University will provide information about hazardous materials used in the workplace.

### **1. HAZARD DETERMINATION**

- 1.1 Safety Data Sheets (SDSs) shall be obtained for all hazardous materials coming onto University campuses. This applies to all hazardous materials whether they are purchased from outside vendors or are donated to the University as samples or gifts. The responsibility for ascertaining that SDSs are on file within a work area where a hazardous material is to be used lies with the Department Director,



Chair, or designee. Northeastern personnel who order hazardous materials must specify on the requisition the department to which the hazardous materials will be delivered. This will allow receiving personnel to route the SDS to the respective department(s).

- 1.2 A separate file shall be maintained in each workplace by the appropriate Department Director, Chair or designee. This file is to be open to inspection by any employee within the workplace.
- 1.3 Hazard determinations for hazardous materials shall be based on the information presented in the SDSs provided by the suppliers of the hazardous materials. When new and significant hazard information becomes available for a given hazardous material or when new SDSs are received from outside suppliers, it is the responsibility of the Department Director, Chair or designee to update this information in the department hazardous materials list and SDS set as soon as possible. In addition, the respective department must forward all updates to University Police.
- 1.4 A designated University Police Representative will maintain an up-to-date file of hazardous materials lists and SDSs for each respective department.
- 1.5 The hazardous materials lists and SDS files will be reviewed at least annually by each respective department to assure that the proper SDSs are kept and are up-to-date.

## 2. **LABELING, SIGNAGE AND PLACARDING**

- 2.1 Each department shall devise its own labeling system which will meet the following minimum criteria:
  - a. The person in charge of receiving for the department or workplace shall ensure that the supplier's label is intact and legible when it first arrives on campus.
  - b. For any chemicals which are determined to be hazardous, the following information must be supplied on the original label or on a label added at the time of receipt within the department or workplace:
    - i. Chemical name, accepted common name or a list of constituents of a mixture, or trade name.
    - ii. For trade names and mixtures, the intended use of the material must be listed along with the name of the person who formulated the mixture or the company which supplied the material.
    - iii. Specific physical and health hazard warnings associated with the hazardous chemical
  - c. If any portion of a hazardous material is transferred from a labeled container to a different container, the new container must also be labeled with the same information unless the following conditions apply:
    - i. The hazardous material will be used only by the person who transferred it to the new container and:
    - ii. The hazardous material is intended for immediate use, always under control of the user and completely used up within the day, or any remaining hazardous material will be returned to a properly-labeled container.
    - iii. If any portion of the hazardous material will remain after use as a hazardous waste requiring special disposal procedures, the container in which the hazardous material residue is collected must be labeled with its contents and hazard class.
- 2.2 Notices shall be posted in each workplace describing the department's container-labeling system.
- 2.3 Signs, placards or operating instructions may be posted on fixed containers (i.e. piping systems or storage tanks) to convey hazardous materials names and physical and health hazards.



### **3. TRAINING**

- 3.1** The Department Directors, Chairs or designees will be responsible for the training of employees within their respective departments as to the provisions of this Hazard Communication Program and in the safe handling of the hazardous materials within the various workplaces.
- 3.2** All new employees with potential exposure to hazardous materials within their job duties will receive training in the provisions of this program prior to working with the hazardous materials at Northeastern.
- 3.3** All current employees who have not received training in this program or who are moving to another department will receive instruction in the provisions of this program within 6 months of implementation of this policy.
- 3.4** The Safety/Environmental Associate, the Department Director, Chair or other designated and qualified person(s) will provide instruction in the provisions of the Hazard Communication Program which will include, but is not limited to, the following information:
  - The purpose of the program and the responsibilities assigned under the program;
  - a. How to read and interpret Safety Data Sheets and where the SDSs are located within the respective departments;
  - b. The employee's obligation to behave in a safe and responsible manner;
  - c. The employer's responsibility to provide a safe working environment and the provisions which have been made to provide that environment;
- 3.5** The Department Director, Chair or other designated and qualified person(s) will provide instruction to each employee in the safe handling and use of each hazardous material found within the workplace before that employee is allowed to work with that hazardous material. This training will include, but is not limited to, the following information:
  - a. The proper use and fit of any protective equipment or clothing required when handling any given hazardous material.
  - b. The effects of overexposure to or contact with the hazardous material and the first-aid measures which should be followed.
  - c. The procedures to follow should a hazardous material be spilled or otherwise accidentally released to the environment.
  - d. Any known hazardous combinations of the given hazardous material with any incompatibles in the workplace.
- 3.6** In laboratories where a great number of hazardous materials may be encountered, the training must, at a minimum, cover the provisions of (Sec. 3.5) above for each chemical class found in the laboratory. All special hazards found in the individual laboratories must be identified and covered in the training.
- 3.7** Safety/Environmental Associate will work with the Department Director, Chair or designee to develop training material appropriate to each workplace.
- 3.8** The Department Director, Chair or designee is responsible for identifying non-routine tasks involving hazardous materials for which employees have not been trained. Special safety instructions will be given before the task is begun.
- 3.9** Written training records will be kept for each employee receiving training under this program. The records will have the following information:



- a. The employee's name and department.
- b. The name of the person presenting the training material.
- c. The specific topics covered in the training which would include a list of hazardous materials covered at that session.
- d. The date on which the training was presented.
- e. The signatures of both the employee and the person presenting the training.

3.10 Copies of each training record will be kept on file in the employee's departmental file. The Departmental Director, Chair or designee should review the training file on a yearly basis to ensure that the information is accurate.

#### **4. OUTSIDE CONTRACTORS**

- 4.1 It is the responsibility of Northeastern personnel requesting the work to determine what Northeastern hazardous materials, if any, the employees of a contractor may have potential exposure to while on the job site. The contractor will be provided with SDSs for any hazardous materials used by Northeastern in the area where the contractor will be working. A signed statement indicating that this information has been received must be obtained from the contractor.
- 4.2 It is the responsibility of Northeastern personnel requesting the work to ensure the contractor provides Northeastern with copies of a hazardous materials list and SDSs on all hazardous materials that the employees of the contractor will bring on to the Northeastern property job site.

#### **5. EMPLOYEE RESPONSIBILITY**

- 5.1 It is the employee's responsibility to comply with all occupational safety and health standards, including the requirements of this program, which are applicable to the employee's actions and conduct in the workplace.
- 5.2 Employees that allow or require students to work with hazardous materials must inform/instruct students of their Illinois Emergency Planning and Community Right to Know Act rights and responsibilities (i.e. hazards present, safe handling, storage and personal protective measures) for the hazardous materials they are exposed to.

#### **6. UNIVERSITY RESPONSIBILITY**

- 6.1 To develop and implement a written Hazard Communication Program that will satisfy the requirements of the Illinois Emergency Planning and Community Right to Know Act.
- 6.2 To enforce all provisions of this program in our workplace.
- 6.3 To train all current and future employees in the hazards of the hazardous materials to which they may be exposed in their work areas and to familiarize them with the requirements of this program.
- 6.4 To designate a person who will be responsible for implementing and enforcing the provisions of this program.
- 6.5 To maintain a list of emergency phone numbers of the persons most familiar with hazardous materials associated with the various workplaces on each Northeastern campus.
- 6.6 To keep the appropriate local and state governmental agencies apprised of potential chemical hazardous materials present on each Northeastern campus.



## PROCEDURES

The University's Safety/Environmental Associate, Office of Human Resources, Department Directors, Chairs or designees will ensure adherence to the training and procedural rules and directives outlined within the Regulations section of this policy.

## HISTORY

Policy Revised 10/20/2020; completed 30-day public review 12/01/2020

Formerly Administrative Memorandum No. 57 – Workplace Safety Procedures Involving Hazardous Chemicals, effective date 03/01/1995

## CONTACT INFORMATION

Please direct questions or concerns about this policy to:

Contact	Phone	Email
<i>Safety/Environmental Associate</i>	<i>(773) 442-5215</i>	<i>r-matus@neiu.edu</i>

## DISCLAIMER

The University reserves the right to modify or amend sections of this policy at any time at its sole discretion. This policy remains in effect until such time as the Responsible Officer calls for review. Requests for exception to any portion of this policy, but not to the policy statement, must be presented in writing to the Responsible Officer.