



## HAZARDOUS COMMODITY DISCLOSURE

<b>Policy Title:</b>	Hazardous Commodity Disclosure
<b>Policy Type:</b>	Administrative
<b>Policy Number:</b>	42-31 (2025)
<b>Approval Date:</b>	3-17-2025
<b>Responsible Office:</b>	Environmental, Health, Safety and Risk Management
<b>Responsible Executive:</b>	Vice President for Finance and Administration
<b>Applies to:</b>	University Community

### POLICY STATEMENT

Norfolk State University (NSU) is committed to maintaining a safe and healthy environment for all faculty, staff, students and visitors. To achieve this goal, it is essential that all hazardous commodities, including chemicals, which are new to the campus undergo a thorough review process before they are introduced into any NSU facility. This policy mandates the completion, submission and approval of the Environmental, Health, Safety & Risk Management (EHSRM) Hazardous Commodity Disclosure Form before acquiring any hazardous commodities.

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### DEFINITIONS

**Hazardous Commodity:** A broad term encompassing any goods or materials that pose potential risks to health, safety, property, or the environment. Hazardous equipment, hazardous materials, and hazardous chemicals all fall under this umbrella, each contributing to the overall risk profile in



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different ways.

**Hazardous Equipment:** Machinery, tools, or devices that present inherent risks or dangers to individuals, property, or the environment when used or operated, e.g., lasers, pressure devices, radiation producing equipment, etc.

**Hazardous Chemicals:** Substances that pose a risk to health, safety, or the environment due to their chemical properties, including commercially available household products.

**Hazardous Materials:** Encompass a broader category that includes hazardous chemicals but also other substances that pose risks due to their physical, biological, or radiological properties. Examples include metals, biological hazards, radioactive materials, etc.

**Safety Data Sheet (SDS):** Detailed informational documents prepared by the manufacturer or importer of a chemical that provide critical information about the properties, hazards, handling, storage, and emergency measures related to the chemical.

### CONTACT(S)

Environmental, Health, Safety and Risk Management officially interprets this policy. The Vice President of Finance and Administration is responsible for obtaining approval for any revisions as required by BOV Policy # 01 (2014) *Creating and Maintaining Policies* through the appropriate governance structures. Questions regarding this policy should be directed to the Environmental, Health, Safety and Risk Management office.

### STAKEHOLDER(S)

All users of Norfolk State University resources.

### POLICY CONTENTS

The purpose of this policy is to ensure the safe handling, storage, transportation, and disposal of hazardous commodities, including hazardous equipment, hazardous materials, and hazardous chemicals, within our organization. This policy applies to all departments and programs and aims to protect the health and safety of students, employees, contractors, visitors, and the environment.

### PROCEDURES

This procedure is to ensure that all hazardous commodities, including but not limited to chemicals, which are new to the University either purchased or donated, are evaluated for environmental, health and safety requirements on proper handling, storage, protective measures including equipment and training, and disposal methods.



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- Before acquiring, hazardous commodities being ordered or donated (procured) for the “first time” by a department require the individual procuring the new hazardous commodity to complete, submit and have an approved EHSRM New Hazardous Commodity Disclosure Form. This is to ensure that Safety Data Sheets (SDS) are available, that all safety and regulatory requirements are in place, and that Personal Protective Equipment (PPE) and training are available prior to the hazardous commodity arriving on campus.
- The EHSRM New Hazardous Commodity Disclosure Form is required regardless of procurement or purchase method (i.e., P-Card, requisition, free vendor samples, etc.) or donation.
- Before entering a requisition or accepting a donation, the individual procuring the new hazardous commodity must forward all completed items to EHSRM at [ehsrn@nsu.edu](mailto:ehsrn@nsu.edu) with the subject line “EHSRM New Hazardous Commodity Disclosure Form”:
  - EHSRM Hazardous Commodity Disclosure Form
  - SDS
  - Manufacturer Guidelines
- The individual procuring the new hazardous commodity and completing the EHSRM New Hazardous Commodity Form must include the SDS with submission of the form. While SDS are most associated with hazardous chemicals due to their potential risks to health, safety, and the environment, SDS may also be available for other types of materials, such as certain hazardous materials, substances with physical hazards (e.g., compressed gases).
- For hazardous equipment or materials, the individual procuring the new hazardous commodity must request the manufacturer’s guidelines and submit with the EHSRM New Hazardous Commodity Disclosure Form. This information should include safety features, operating/use instructions, training requirements, maintenance schedules, emergency procedures, PPE recommendations, storage guidelines, disposal procedures, certifications, and contact information for technical support.
- After the EHSRM Hazardous Commodity Disclosure Form is received by EHSRM, EHSRM will review and collaborate with stakeholders to promptly provide information on environmental, health, safety and risk management requirements, including PPE, training, signage, storage guidelines, disposal and other necessary precautions and requirements. Training may be provided as agreed upon with stakeholders by EHSRM or other qualified individuals. If approved, EHSRM will promptly return the EHSRM New Hazardous Commodity Disclosure Form to the sender indicating “approved” status noting that all EHSRM requirements must be met. If denied, the sender will be contacted by the EHSRM Director.



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- For purchases, the EHSRM-approved New Hazardous Commodity Disclosure Form must be attached to the eVA requisition for consideration by the assigned buyer.
- EHSRM will update the University's Safety Data Sheet inventory.
- Copies of submitted EHSRM New Hazardous Commodity Disclosure Forms and other relevant information related to the hazardous commodity must be kept on file by the procuring Division, Department, or Program.
- New hazardous commodities are not to be used until EHSRM department provides all safety and regulatory requirements and all relevant stakeholders have received adequate training.
- Once an EHSRM review and approval is completed for a hazardous commodity, the procurer may use the approval for subsequent procurement/donation of the same hazardous commodity.

## **EDUCATION AND COMPLIANCE**

EHSRM will provide education and training for all stakeholders and appropriate audiences on the purpose of the policy.

All stakeholders have a shared responsibility for complying with this policy, and specific stakeholders have additional compliance related responsibilities and authorities as follows:

- Department heads and supervisors are responsible for ensuring compliance within their work units. Department heads and supervisors must ensure that chemical inventories for their areas are current, and hazardous materials are stored, utilized and disposed of properly. They are also responsible for ensuring that all pertinent stakeholders receive comprehensive training and adhere strictly to environmental, health and safety requirements when handling any hazardous chemicals, materials or equipment.
- EHSRM personnel may suspend or cease activities and operations that are not in full compliance with regulations and/or University EHSRM plans, policies, and procedures.
- EHSRM may inspect and audit University facilities to monitor and assess environmental, safety and health conditions, as well as compliance with regulations, EHSRM plans, policies and procedures.
- Faculty and researchers are responsible for identifying and communicating instructional



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and research projects involving hazardous materials with EHSRM and working together to determine environmental, health, safety and risk management requirements.

- Supervisors are responsible for implementing corrective and disciplinary actions for employees under their supervision when Environmental, Health, Safety & Risk Management plans, policies, and procedures are not followed.
- Faculty and other employees who, as a part of their job responsibilities work with students, are responsible for implementing corrective and disciplinary actions for students under their supervision when Environmental, Health, Safety & Risk Management plans, policies, and procedures are not followed.

### **PUBLICATION**

The policy may be found in the Norfolk State University Policy Library and the Facilities Management EHSRM webpage.

### **REVIEW SCHEDULE**

- Next Scheduled Review: 12-1-2026
- Approval by President, date finalized: 03-17-2025
- Revision History: Initial Creation
- Supersedes: NA

### **RELATED DOCUMENTS**

Administrative Policy # 42-30 (2023) Environmental, Health & Safety Policy:

<https://www.nsu.edu/policy/admin-42-30.aspx>

eVA National Institute of Government Purchasing (NIGP) Commodity Code Look-up:

[https://logi.cgieva.com/External/rdPage.aspx?rdReport=Public.Reports.Report9004\\_Data](https://logi.cgieva.com/External/rdPage.aspx?rdReport=Public.Reports.Report9004_Data)

### **FORMS**

EHSRM New Hazardous Commodity Disclosure Form



## HAZARDOUS COMMODITY DISCLOSURE

### EHSRM New Hazardous Commodity Disclosure Form

1. To ensure compliance with federal, state and local requirements, this completed and submitted form must be approved by EHSRM prior to entering a requisition or accepting a donation of a hazardous commodity. If you are uncertain whether your procurement or donation is a hazardous commodity, please contact EHSRM: [ehsrn@nsu.edu](mailto:ehsrn@nsu.edu)
2. Forward the completed form with SDS and manufacturer's guidelines to EHSRM at [ehsrn@nsu.edu](mailto:ehsrn@nsu.edu) with the subject line "EHSRM New Hazardous Commodity Disclosure Form".
3. After the EHSRM New Hazardous Commodity Disclosure Form is received by EHSRM, EHSRM will review and collaborate with stakeholders to promptly provide information on safety requirements, including Personal Protective Equipment (PPE), training, signage, storage guidelines, disposal and other necessary precautions and requirements. Training may be provided as agreed upon with stakeholders by EHSRM or other qualified individuals. EHSRM will return the form as "approved" with the understanding that all noted requirements will be met.
4. EHSRM will update the NSU Safety Data Sheet inventory.
5. It is the procurer's responsibility to ensure all relevant stakeholders complete adequate training and adhere to environmental, health and safety requirements when handling hazardous commodities.
6. Copies of Disclosure Form(s), SDS and manufacturer's guidelines must be kept on file by the procuring Department, or Program

\*Commodity Category: New Chemicals, Compressed Gases, Hazardous Chemical/Material/Equipment

<b>Department:</b>				<b>Date:</b>	
<b>Campus:</b>		<b>Building:</b>		<b>Room#:</b>	
<b>Name of (work area) Responsible Party/ Supervisor:</b>					
<b>Completed by:</b>				<b>Signature:</b>	
<b>COMMODITY CATEGORY*</b>	<b>PRODUCT NAME</b> (Chemical/Trade Name)	<b>MANUFACTURER</b> (Name and Address)	<b>SIZE &amp; QUANTITY</b>	<b>INTENDED PRODUCT USE</b>	
1					
2					
3					
<b>EHSRM Approved (See Comments Below)</b> YES      NO		<b>EHSRM SIGNATURE:</b>			
Comments (Include notations concerning any special precautions): <i>All noted requirements must be met.</i>					