


<b><i>HEALTH AND SAFETY MANUAL</i></b>		
Title: Hazard Communication Program		
Approved by: Greg Savoy		Rev. 4/1/08

1 Purpose/Scope:

The Company is firmly committed to providing each of its employees a safe and healthy work environment. It is recognized that workers may use chemicals or substances that have potentially hazardous properties. When using these substances, workers must be aware of the identity, toxicity or hazardous properties of a chemical or substance, since an informed employee is more likely to be a safe employee. To this end, The Company has established a written Hazard Communication Program. Compliance with this program will ensure that the hazards of all chemicals and substances are evaluated and the information concerning their hazards is communicated to employees, including emergency response organizations, state and federal agencies, other employers and contractors, as necessary. This hazard information will be communicated, and displayed in accordance with this Hazard Communication Program.

This program is applicable to all Company employees who may be exposed to hazardous chemicals. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

2 Definitions/Responsibilities:

2.1 Definitions:

- 2.1.1 Chemical - any element, chemical compound, or mixture of elements and/or compounds.
- 2.1.2 Chemical Inventory List - a list of chemicals used at this facility, or by personnel that report to this facility.
- 2.1.3 Electronic Access – using electronic media (telephone, fax, internet, etc.) to obtain Material Safety Data Sheets or health information.
- 2.1.4 Facility - an establishment at one geographical location containing one or more work areas.
- 2.1.5 Hazardous chemical - any chemical that is a physical hazard, a health hazard, or has a Permissible Exposure Limit established for it.

- 2.1.6 Hazardous substance - see hazardous chemical.
- 2.1.7 Hazard Communication Program Coordinator - the person who has overall responsibility at a facility for that facility's Hazard Communication Program.
- 2.1.8 Health hazard - a substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic adverse health effects may occur in exposed employees.
- 2.1.9 IDLH - immediately dangerous to life and health.
- 2.1.10 Immediate Use - the chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- 2.1.11 Jobsite - an area remote from a company facility where hazardous chemicals are stored or used and employees are present for the purpose of company business.
- 2.1.12 (MSDS) Material Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g).
- 2.1.13 (NFPA) National Fire Protection Association Labeling - a common industry labeling method developed by the National Fire Protection Association to identify the hazards associated with a particular chemical.
- 2.1.14 (PEL) Permissible Exposure Limit - the maximum eight-hour time weighted average of any airborne contaminant to which an employee may be exposed.
- 2.1.15 Readily available - when an employee has access during the course of his/her normal work shift.
- 2.1.16 Substance - see Chemical.
- 2.1.17 (TLV) Threshold Limit Value - the airborne concentration of a substance that represents conditions under which it is believed that nearly all normal workers may be repeatedly exposed day after day without adverse effect.
- 2.1.18 Work area - a room or defined space in a facility where hazardous chemicals are stored or used and where one or more employees are present.
- 2.1.19 Workplace - see Facility.
- 2.1.20 Workplace Chemical List - see Facility Chemical List.

## 2.2 Responsibilities:

A written hazard communication program shall be developed, implemented and maintained at each Company workplace. The program shall describe how labels, other forms of warning, and material safety data sheets shall be communicated to employees.

2.2.1 The following positions shall act as the Hazard Communication Program Coordinator for all employees reporting to him/her and will answer questions and provide additional information about the program:

- The Region Manager for field operations;
- The Shop Manager for stand alone shop operations; and
- The Facilities Manager for dedicated office locations.

2.2.2 The Supervisor is responsible to ensure employees receive training and proper personal protective equipment.

2.2.3 Employees are responsible for following the requirements in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately and to not deface any label.

### 3 Requirements:

#### 3.1 Introduction:

3.1.1 This Hazard Communication Program was prepared for use by Company to explain how the company meets the requirements of the federal Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200).

- It spells out how the company will inventory chemicals stored and used, obtain and use material safety data sheets, maintain labels on chemical substances, and train employees about the hazards of chemicals they are likely to encounter on the job.

3.1.2 Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.

- Using this information is part of our shared commitment to a safe, healthy workplace.

### 3.2 List of Chemicals:

The Company maintains a listing of all chemicals used at, or by, this facility.

- This chemical inventory list is updated as necessary and at least annually by the Hazard Communication Program Coordinator or their designee.
- The facility chemical inventory list must be available for review upon request.

### 3.3 Material Safety Data Sheets:

3.3.1 Material Safety Data Sheets, for chemicals used in this facility or by personnel reporting to this facility, are readily available to all employees during all work shifts.

- Material Safety Data Sheets are located in the facility office and can be obtained by contacting your Supervisor.

3.3.2 The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Material Safety Data Sheet in a timely fashion is prohibited.

3.3.3 Control of Material Safety Data Sheets:

- The Material Safety Data Sheet must be kept in the MSDS library for as long as the chemical is used by the facility.

3.3.4 Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain MSDS libraries and archives.

### 3.4 Labels, Labeling and Warnings:

3.4.1 The Hazard Communication Program Coordinator will ensure that all hazardous chemicals used or stored in the facility are properly labeled.

- Damaged labels or labels with incomplete information shall be reported immediately.
- Damaged labels on incoming containers of chemicals shall not be removed.
- New labels shall be provided as needed so that all containers are properly labeled.
- Only containers into which an employee transfers a chemical for their own immediate use will not require labeling.

- Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:
- The name of the substance
- The hazards related to the substance
- The safety precautions required for working with the substance.

3.4.2 Labels, tags or markings on containers shall list as a minimum:

- Words, pictures, symbols or combinations there of may be used.
- The trade name of the product as listed on the Material Safety Data Sheet.
- Appropriate hazard warnings to help employees protect themselves from the hazards of the substance.
- Labels provided by chemical manufacturers, distributors, and importers must also list the name and address of the manufacturer, importer, or vendor responsible for the chemical, and from whom more information about the chemical can be obtained.
- Labels shall be legible, in English. However, for non-English speaking employees, information shall be presented in their language as well.

3.4.3 Personnel in the Shipping and Receiving Departments are responsible for proper labeling of all containers shipped by The Company and for the inspection of all incoming materials to ensure correct labeling.

- Chemicals received from vendors that are not properly labeled must be rejected.

3.4.4 NFPA Standard 704 labels shall be the preferred hazard identification method used in Company facilities and on materials containers used on client sites.

- A description of the NFPA labeling system is included in Exhibit 5.1.
- All employees, clients, subcontractors and visitors who may come in contact with a Company hazardous substance must be briefed to ensure understanding of the NFPA 704 labeling system.

3.5 Training:

3.5.1 Every employee who works with or may be exposed to hazardous chemicals will be trained annually on the safe use of those substances and about the hazard communication standard.

- New or newly assigned employees shall be provided training before working with or working in an area containing hazardous chemicals.
- 3.5.2 Additional training will be provided whenever a new chemical hazard is introduced into the work area.
- To reinforce the importance of handling chemicals properly when performing new or non-routine tasks, Supervision will conduct supplementary training as needed.
- 3.5.3 Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.
- The Supervisor shall ensure records of employee training are maintained.
- 3.5.4 The Hazard Communication Program training shall, as a minimum, include:
- Requirements and rights of the employee as contained in the Hazard Communication Regulation
  - Operations and work areas where hazardous chemicals are present.
  - Location of the written Hazard Communication Program, and the Chemical Inventory List.
  - How to access MSDS's or MSDS information.
  - How to read labels and Material Safety Data Sheets for pertinent hazard information.
  - How to determine the presence or release of a hazardous substance in the workplace.
  - Physical and health effects of over exposure to hazardous substances in the workplace.
  - How personnel can protect themselves or prevent exposure to hazardous substances, through the use of protective equipment, proper work practices and engineering or environmental controls.
  - The proactive steps The Company has taken to prevent exposure to hazardous substances and non-routine tasks.
  - Emergency and first aid procedures to follow for exposure or harm caused by hazardous substances.

### 3.6 Multi-Employer Job Sites/Multi-Work Sites:

Where employees must travel between work places during a work shift, the written

HAZCOM Program shall be kept at a primary job site. If there is no primary job site, then the program shall be sent with employees.

3.6.1 A pre-job briefing shall be conducted with the contractor prior to the initiation of work on the site.

- During this pre-job briefing, contractors shall notify The Company and present current copies of Material Safety Data Sheets for every hazardous substance brought on-site.
- The Company shall notify and provide MSDS's for all hazardous materials the contractor may encounter on the job.
- The facilities labeling system and any precautionary measures to be taken by contractor during normal conditions and emergencies shall be addressed.
- By providing such information to other employers, The Company does not assume any obligations that other employers have for the safety of their employees.
- In this regard, other employers working on Company property or for The Company on client's property remain fully responsible for developing and implementing their own compliant hazard communication programs.

4 References:

29 CFR 1910.1200, Hazard Communication.

5 Exhibits:

H-2.1 NFPA 704, Standard System for the Identification of Hazardous Materials:

**Exhibit H-2.1**

***NFPA 704***

The NFPA 704 Diamond is a means of disseminating hazard information for a material. The diamond is divided into four sections. Each of the first three colored sections has a number in it associated with a particular hazard. The higher the number is, the more hazardous a material is for that characteristic. The fourth section includes special hazard information. The four sections and an explanation of the numbers in them is provided below:

