

# Hazard Communication Plan

The chemicals we work with are common for our Industry. Employees have a right to know what chemicals they are working with. Safety Data Sheets are available through the office.

## Responsibilities:

### Management

1. Ensure compliance with this program
2. Conduct immediate corrective action for deficiencies found in the program
3. Maintain an effective Hazard Communication training program
4. Make this plan available to employees
5. Ensure all received containers are properly labeled and that labels are not removed or defaced
6. Ensure all shipped containers are properly labeled
7. Ensure shipping department employees are properly trained in spill response
8. Ensure received Material Safety Data Sheets (MSDS) are properly distributed
9. Obtain, from the manufacturer, MSDS for chemicals purchased from retail sources

### Training Coordinator

1. Maintain a list of hazardous chemicals using the identity that is referenced on the MSDS
2. Monitor the effectiveness of the program
3. Conduct annual audit of the program
4. Monitor employee training to ensure effectiveness
5. Keep management informed of necessary changes
6. Ensure MSDS's are available as required
7. Monitor facility for proper use, storage and labeling of chemicals

### Foremen

1. Comply with all specific requirements of the program
2. Provide specific chemical safety training for assigned employees
3. Ensure chemicals are properly used stored and labeled
4. Ensure only the minimum amount necessary is kept at work stations
5. Ensure up to date MSDS are readily accessible to all employees on all shifts.

### Employees

1. Comply with chemical safety requirements of this program
2. Report any problems with storage or use of chemicals
3. Immediately report spills or suspected spills of chemicals

4. Use only those chemicals for which they have been trained
5. Use chemicals only for specific assigned tasks in the proper manner

## General Program Information:

This written Hazard Communication Plan (HAZCOM) has been developed based on OSHA Hazard Communication Standard and consists of the following elements:

1. Identification of Hazardous Materials
2. Product Warning Labels
3. Material Safety Data Sheets (MSDS)
4. Written Hazard Communication Program
5. Effective Employee Training

Some chemicals are explosive, corrosive, flammable, or toxic. Other chemicals are relatively safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, persons who handle chemicals in any area of the Company must understand the hazardous properties of the chemicals. Before using a specific chemical, safe handling methods and health hazards must always be reviewed. Supervisors are responsible for ensuring that the equipment needed to work safely with chemicals is accessible and maintained for all employees on all shifts.

## Employee Training:

### Initial Orientation Training

All new employees shall receive safety orientation training covering the elements of the HAZCOM and Right to Know Program. This training will consist of general training covering:

1. Location and availability of the written Hazard Communication Program
2. Location and availability of the list of chemicals used in the workplace
3. Methods and observation used to detect the presence or release of a hazardous chemical in the workplace.
4. The specific physical and health hazard of all chemicals in the workplace
5. Specific control measures for protection from physical or health hazards
6. Explanation of the chemical labeling system
7. Location and use of MSDS

## Job Specific Training

Employees will receive on the job training from their foreman. This training will cover the proper use, inspection and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or will be working around.

## Annual Refresher Training

Annual Hazard Communication refresher training will be conducted as part of the Company's continuing safety training program.

## Immediate On-the-Spot Training

Supervisors will conduct this training for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

## General Chemical Safety:

Assume all chemicals are hazardous. The number of hazardous chemicals and the number of reactions between them are so large that prior knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects.

The following general safety rules shall be observed when working with chemicals:

1. Read and understand the Material Safety Data Sheets.
2. Keep the work area clean and orderly.
3. Use the necessary safety equipment.
4. Carefully label every container with the identity of its contents and appropriate hazard warnings.
5. Store incompatible chemicals in separate areas.
6. Substitute less toxic materials whenever possible.
7. Limit the volume of volatile or flammable material to the minimum needed for short operation periods.
8. Provide means of containing the material if equipment or containers should break or spill their contents.

## Chemical Storage:

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

1. Flammable liquids: store in approved flammable storage lockers.
2. Acids: treat as flammable liquids

3. Bases: do not store bases with acids or any other material
4. Other liquids: ensure other liquids are not incompatible with any other chemical in the same storage location.
5. Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals in case of earthquake.
6. Chemicals will not be stored in the same refrigerator used for food storage. A label on the door must appropriately identify refrigerators used for storing chemicals.

## Container Labels:

It is extremely important that all containers of chemicals are properly labeled. This includes every type of container from a 5000-gallon storage tank to a spray bottle of degreaser. The following requirements apply:

1. All containers will have the appropriate label, tag or marking prominently displayed that indicates the identity, safety and health hazards.
2. Portable containers that contain a small amount of chemical need not be labeled if they are used immediately that shift, but must be under the strict control of the employee using the product.
3. All warning labels, tags, etc., must be maintained in a legible condition and not be defaced. Weekly facility inspections by Supervisors will check for compliance of this rule.
4. Incoming chemicals are to be checked for proper labeling.

## Emergencies and Spills:

In case of an emergency, implement the proper Emergency Action Plan

1. Evacuate people from the area.
2. Isolate the area.
3. If the material is flammable, turn off ignition and heat sources.
4. Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area.
5. Call for Emergency Response Team assistance if required.
6. Maintain the smallest possible inventory of chemicals to meet immediate needs.
7. Periodically review stock of chemicals on hand.
8. Ensure that storage areas, or equipment containing large quantities of chemicals, are secure from accidental spills.
9. Rinse emptied bottles that contain acids or inflammable solvents before disposal
10. Recycle unused laboratory chemicals wherever possible.
11. DO NOT place hazardous chemicals in salvage or garbage receptacles.
12. DO NOT pour chemicals onto the ground.
13. DO NOT Dispose of chemicals through the storm drain system.
14. DO NOT Dispose of highly toxic, malodorous chemicals down sinks or sewer drains.
15. Consult the MSDS