

Hazard Communication

1.1 PURPOSE

- 1.1.1 The purpose of this policy is to protect TERRY R PITT CONSTRUCTION employees against exposure to hazardous chemicals in the workplace.

1.2 DEFINITIONS

- 1.2.1 *Hazardous chemical* - any chemical that is a physical hazard (combustible, explosive, flammable, unstable, water reactive, etc.) or a health hazard (carcinogen, toxic agent, irritant, corrosive, sensitizer, etc.)

1.3 RESPONSIBILITIES

- 1.3.1 TERRY R PITT CONSTRUCTION will provide employees with information and training on hazardous chemicals to which they may be exposed in their work areas at the time of their initial assignment and whenever a new hazard is introduced in the workplace. That information will include the requirements of the HAZCOM standard, any operations in their work area where hazardous chemicals are present, and the location of the written HAZCOM program.
- 1.3.2 TERRY R PITT CONSTRUCTION will communicate, develop, implement, and maintain this program at each worksite, with any involved employee.
- 1.3.3 Supervisor will ensure personnel are properly trained as appropriate for their position and responsibilities.
- 1.3.4 Employees have the responsibility to learn and understand the provisions of the company's hazard communication program.
- 1.3.5 Employees should understand how to access and resource safety data sheets and should know how to seek help for clarification when warranted.
- 1.3.6 New employees have the responsibility for maintaining a close and inquisitive relationship with their supervisor and other, more experienced employees. The first few days of an employee's employment will be critical to the overall safety efforts of the company and to the employee's acclimatization to prescribed work procedures.
- 1.3.7 An inventory list of all hazardous chemicals will be maintained by the safety department and product identifiers will be used that are referenced on the appropriate SDS. This is to assure that SDSs exist for all hazardous chemicals in the workplace.

1.4 GENERAL REQUIREMENTS

- 1.4.1 A written hazard communication program will be developed, implemented, and maintained at each workplace that describes how labels and other forms of warning, safety data sheets, and employee information will be met.
- 1.4.2 All chemicals will be checked in and verified to be an approved chemical.

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- 1.4.3 The safety department will maintain a list of all hazardous materials used in operations. This list will contain the name of the product, the type of product (solvent, adhesive etc.), and the name and address of the manufacturer.
- 1.4.4 If required to handle unfamiliar chemicals, employees should notify supervision or safety department.
- 1.4.5 Avoid inhaling vapors and fumes. Remain upwind of escaping fumes.
- 1.4.6 Do not attempt to siphon by mouth, via suction, any liquids from tank or containers.
- 1.4.7 The safety department will annually review new and existing jobs to ensure potential exposure to toxic or hazardous substances are properly identified.
- 1.4.8 Copies of the program, a listing of hazardous chemicals, and safety data sheets will be available 24 hours a day. When employees are working offsite they will have an inventory list and SDSs that they can bring to the site with them.
- 1.4.9 If TERRY R PITT CONSTRUCTION produces, uses, or stores hazardous chemicals in a manner that employees of other organizations may be exposed, then TERRY R PITT CONSTRUCTION will:
 - 1.4.9.1 Develop a method for sharing SDSs
 - 1.4.9.2 Develop a method for informing other organizations of precautionary measures that are necessary to protect their employees from workplace exposure during normal operating conditions and during emergencies
 - 1.4.9.3 Develop a method for informing other organizations' employees of the site-specific labeling system.

1.5 LABELS

- 1.5.1 Labels are to be on all hazardous chemical containers. Labels may be written, printed, or affixed to containers of hazardous chemicals. Labels must contain appropriate hazard warnings and state the identity of the chemical as it appears on the SDSs. Shipped containers must also have the manufacturer's name and address.
- 1.5.2 All employees who transfer hazardous chemicals into portable containers will ensure the containers are appropriately labeled. Each label will identify warnings and the name and address of the chemical manufacturer or other responsible party. Employees will use the National Fire Protection Association (NFPA) 704 or Hazardous Material Identification System (HMIS) labels on containers. Employees will have access to labels at all times onsite and offsite.
- 1.5.3 Manufacturer's labeling systems will provide, at a minimum: the identity of the chemical, appropriate hazard warnings, and the name and address of the manufacturer. New GHS compliant labels are also starting to become available for chemicals manufactured after 2012. These labels have a standardized format and must include, at a minimum, the following content: a

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product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

- 1.5.4 Under the revised Hazard Communication standard, manufacturers are permitted to supply chemicals with labels that conform to either the old or newly revised Hazard Communication standard during the transition period; after which time, GHS compliant labeling will become mandatory. For this reason, operating units must be familiar with both the old and new labeling requirements in the interim and for chemicals produced prior to 2012.
- 1.5.5 Hazardous chemical container labels may not be removed or defaced until the container has been cleaned or purged of its contents and there is no longer any hazard associated with the container. Labels from containers that contain P-listed waste/residue are not to be removed. These containers should be turned over to the safety department for proper disposition. DOT shipping labels on containers will not be removed until all residues have been removed.
- 1.5.6 Specific chemical hazard information will be made available to affected employees via labeling and SDSs.

1.6 SAFETY DATA SHEETS

- 1.6.1 SDSs are to be written or printed material containing information known about the chemical. SDSs must include both the chemical and common names. SDSs must list the following: physical and chemical characteristics, hazards, health hazards including signs and symptoms of exposure, any application exposure limits, the date of preparation of the SDS, appropriate emergency actions, first aid procedures, known control measures, and applicable precautions for safe use and handling, including appropriate personal protective equipment and the name of the chemical manufacturer, importer, distributor or other party responsible for preparing or distributing the SDS.
- 1.6.2 Chemical manufacturers are responsible for developing SDSs. TERRY R PITT CONSTRUCTION will have an SDS for each chemical used. SDSs for all hazardous chemicals in inventory must be obtained from the manufacturer. SDSs will be maintained by the safety department. They are to identify hazards and the need for employee training. SDSs must be readily accessible and available to all employees at all times on all shifts and all jobsites. SDSs will be known beforehand of all outside jobsite or multi-employer environments.
- 1.6.3 SDSs will be given to the safety department before a new chemical comes to the facility. There must be SDSs for all required chemicals at TERRY R PITT CONSTRUCTION. It is the responsibility of the purchasing department to have all new products reviewed by the safety department before coming into the company. It is the shipping department's responsibility to ensure that all chemicals have SDSs before coming into the building. Employees will have access to SDSs on all shifts and jobsites.

1.7 NON-ROUTINE TASKS

- 1.7.1 Workers may perform non-routine tasks that involve the use of hazardous chemicals or processes. Before conducting non-routine tasks, supervisors will inform employees of:

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- 1.7.1.1 The specific hazards associated with the performance of the task and/or chemicals
- 1.7.1.2 Protective measures that must be used
- 1.7.1.3 Measures that the department has taken to lessen these hazards (ventilation, personal protective equipment, or the presence of another employee)
- 1.7.1.4 Specific emergency procedures to be used in the event of an accident or injury

1.8 EMERGENCY RESPONSE

- 1.8.1 Workers who witness or are involved in an overexposure incident or exposure to any hazardous substance in use by TERRY R PITT CONSTRUCTION employees or other affected workers, should dial the 9-1-1 emergency response number to summon local emergency personnel immediately.
- 1.8.2 Emergency showers and eyewash fountains will be installed in strategic locations. These stations will be easily accessed and clearly posted with effective signs. Personnel working with toxic, corrosive, or flammable materials will be aware of these locations or have plenty of fresh water immediately available when handling chemicals.
- 1.8.3 If any corrosive or toxic substances contact the skin or eyes, flush the affected parts for 15 to 20 minutes with clean running water. Seek medical attention as quickly as possible.
- 1.8.4 Contaminated clothing will be removed promptly.
- 1.8.5 Chemical spills should be contained by the employee from a safe distance. Every attempt should be made to keep contamination or existing hazards from affecting other areas and personnel.
- 1.8.6 Employees who are conscious and have been exposed to a chemical or other hazardous substance should be taken immediately to a source of clean fresh air.
- 1.8.7 Administering personnel should make every attempt to keep an unconscious employee's airway open and rescue breathing should be started for the employee until normal respiration begins or trained medical personnel arrive.
- 1.8.8 Supervisors should always have assembly areas designated to take head count of all employees in the work crew, in the event of an emergency.

1.9 RECORDKEEPING

- 1.9.1 TERRY R PITT CONSTRUCTION will maintain all records pertaining to this program, at the home office. Inclusive, but not limited to, will be records pertaining to the following:
 - 1.9.1.1 Employee training records/Safety meeting rosters
 - 1.9.1.2 Job Safety Analysis
 - 1.9.1.3 Safety Data Sheets for chemicals and explosives in current use

- 1.9.1.4 Medical and exposure records/Positive drug test reports
- 1.9.1.5 Injury reports

1.10 TRAINING

- 1.10.1 TERRY R PITT CONSTRUCTION will ensure that employees are adequately trained and are equipped with the knowledge and information necessary to conduct their jobs safely. It is likely that additional training will be needed since employees must know the specifics of TERRY R PITT CONSTRUCTION, such as where the SDSs are located, details of TERRY R PITT CONSTRUCTION's labeling system, and the hazards of new chemicals to which they will be exposed. An employer has a responsibility to evaluate an employee's level of knowledge with regard to the hazards at the facility, their familiarity with the requirements of the standard, and TERRY R PITT CONSTRUCTION's HAZCOM program.
- 1.10.2 Employees will be trained at the time they are assigned to work with a hazardous chemical and shall have information prior to exposure.
- 1.10.3 Training shall not only include the hazards of the chemicals at the jobsite, but also how to use the information generated in the hazard communication program. This can be accomplished in many ways (audiovisuals, classroom instruction, and interactive video) and shall include an opportunity for employees to ask questions to ensure that they understand the information presented to them.
 - 1.10.3.1 It is not necessary that the employer retrain each new hire if that employee has received prior training by a past employer, an employee union, or any other entity. General information, such as the basics of the HCS could be expected to remain with an employee from one position to another.
- 1.10.4 Training need not be conducted on each specific chemical found at the facility or job location but may be conducted by categories of hazard (ex. carcinogens, sensitizers, acutely toxic agents) that are or may be encountered by an employee during the course of his job. The training must be comprehensible. If the employees receive job instructions in a language other than English, then the training and HAZCOM information will need to be conducted in that language.
- 1.10.5 All employees will be trained to read and follow SDSs. Employees must be familiar with all dangerous chemicals used on the job, proper PPE needed, and proper labeling of containers. Employees will be trained to take a chemical list and SDSs to all jobsites.
- 1.10.6 Due to the 2012 revision to the HAZCOM standard, employees will be provided with updated training that describes changes to the chemical classification process, SDS structure and content, and new chemical labeling requirements.
- 1.10.7 Additional training is to be done whenever a new physical or health hazard is introduced into the work area, not a new chemical.