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Hazard Communications Program

INTRODUCTION

Gordon H. Baver, Inc. is committed to the health and safety of all of their employees. Further, it is the intent of our Company to comply with Title 34, Part XIII, Chapters 301 – 323, Labor & Industry regarding the Worker & Community Right-To-Know. The purpose of this program is to ensure that the hazards of all chemicals are made known to every employee working with or around them. The requirements of this program are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and OSHA regulation 29 CFR 1910.1200 (OSHA HCS 2012). This program outlines the procedures as they relate to container labeling, safety data sheets, and employee training.

SCOPE

As the employer, it is our responsibility to provide information to our employees about the hazardous chemicals to which they are exposed through our written hazard communication program, labels, other forms of warning, safety data sheets, and training. It is our intent to communicate our formal hazard communication program's policies and procedures in this section.

RESPONSIBILITIES

The Safety Committee is responsible for administering the hazard communication program. His/her responsibilities will include:

- Identify all hazardous chemicals in Department and every Location.
- Maintain and keep current the "Inventory of Hazardous Chemicals."
- Ensuring that ALL containers are labeled, tagged, or marked properly according to the new GHS labeling provisions.
- Provide new-hire and ongoing training for all affected employees.
- Maintain training records for all affected employees.
- Monitor the air concentrations of hazardous chemicals in the work environment and advise upper management if levels exceed the permissible levels and require engineering controls such as increased ventilation, etc.
- Select and maintain the appropriate personal protective equipment.
- Direct the cleanup and disposal operations of the spill control team.
- Inform outside contractors who are performing work on company property about potential hazardous chemicals.
- Review the effectiveness of the hazard communication program and ensuring it satisfies the requirements of all applicable federal, state, or local hazard communication requirements.

Employees are responsible for the following aspects of the hazard communication program:

- Identify hazardous chemicals before starting a job. If you are unsure, ask your direct supervisor.
- Read the container labels and Safety Data Sheets (SDS) before using the chemical.
- Notify Safety Chair of torn, damaged or illegible labels or of unlabeled containers.
- Use appropriate controls and/or personal protective equipment provided by the company to minimize exposure.
- Follow company instructions and warnings pertaining to chemical handling and usage.
- Properly care for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement.
- Know and understand the consequences associated when the procedures concerning the safe handling and use of chemicals are not followed.
- Participating in training.

CONTAINER LABELING

Each container of hazardous chemicals in the workplace will be labeled, tagged, or marked with a GHS formatted label that includes the product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s), and supplier information.

No employee shall remove or deface existing labels on containers of hazardous chemicals. Chemical labels are to be legible and prominently displayed on the container. If a hazardous chemical is transferred to another container other than its original container, a GHS formatted label must be affixed to the new container immediately, using a GHS formatted label. If a hazardous chemical is not labeled, the receiver shall refuse shipment.

Labeling of Combustible or Flammable Liquid Storage Containers

Gasoline cans that are labeled by their manufacturer as “gasoline,” do not provide adequate warnings and must be labeled in accordance with the new GHS requirements.

EMPLOYEE POSTINGS & EMERGENCY TELEPHONE NUMBERS

9-1-1 is active within Gordon H. Bayer, Inc’s jurisdiction. It is the responsibility of each supervisor to obtain the local emergency telephone numbers for emergency services in areas in which they are working are not covered by the 9-1-1 service. These contact numbers must be posted in conspicuous areas. Gordon H. Bayer, Inc. will rely on the Local Fire Department per Project Location to respond to and handle all such emergencies related to hazardous chemicals. In the event that the hazardous chemical incident exceeds the resources available internally, external aid will be called to assist.

SAFETY DATA SHEETS

Direct Superintendent maintains Safety Data Sheets (SDS) for each hazardous chemical utilized in our job sites. These sheets will be made readily available and are kept in the field offices.

Safety Data Sheets (SDS) are developed by chemical manufacturers and importers and they provide employees with information concerning the hazards presented by each chemical. Manufacturers and importers are required to provide Safety Data Sheets to the employer prior to or at the time of the shipment.

Each Department will stipulate on each order for materials that a Safety Data Sheet must accompany the shipment. Individual purchasing consumer products in a quantity that exceeds the amounts typically used by a household consumer must obtain an SDS. In addition, consumer products that are purchased in small quantities, but will be used in a manner that will result in greater exposure than found in a typical household application, shall also obtain an SDS.

If the SDS is not provided with a shipment that has been labeled as a hazardous chemical, notify your Supervisor and they shall request an SDS. If problems arise in obtaining an SDS a phone call will be made to the manufacturer, importer, or distributor. The phone call will be logged and a letter or email requesting the same will be sent. New Safety Data sheets will be obtained by the receiving department and provided to Gordon H. Bayer, Inc. to add to the master file.

There are sixteen (16) required sections in the newly adopted SDS, including:

Section Number	Section Classification
Section I	Product Identification
Section II	Hazard Identification
Section III	Composition (Ingredients)
Section IV	First-Aid Measures
Section V	Fire Fighting Measures
Section VI	Accidental Release Measures
Section VII	Handling and Storage
Section VIII	Exposure Controls and Personal Protection
Section IX	Physical and Chemical Properties
Section X	Stability and Reactivity
Section XI	Toxicological Information
Section XII	Ecological Information
Section XIII	Disposal Considerations
Section XIV	Transport Information
Section XV	Regulatory Information
Section XVI	Other Information

Safety Data Sheets will be updated as new information becomes available. The Safety Committee shall be responsible for updating the old SDS with a new SDS. New information may require supplemental training, as determined by the changes in the hazards presented by the product.

Each employee shall have the right to review an SDS for any hazardous chemical with which they work or come into contact with, by referring to a copy of the SDS in the SDS books. The SDS book will be available in the job trailer. The SDS binder must never be stored in a supervisor's or manager's office! All employees are permitted and encouraged to review the SDS for the products they use. SDS may not be removed from the binder, except for the purpose of photocopying. The sheet(s) shall then be immediately returned to the SDS binder.

The SDS binder must be arranged in a manner that allows for the quick and easy identification of chemicals used in the workplace. This shall be achieved by alphabetizing products or grouping the products by their function. Enough SDS books must be available in the workplace to provide immediate and easy access to all employees.

PERSONAL PROTECTIVE EQUIPMENT

The handling or use of certain chemicals requires the use of Personal Protective Equipment (PPE). To determine the appropriate type(s) of PPE required in the handling of specific hazardous chemicals, please refer to the appropriate Safety Data Sheet. If you remain uncertain about the PPE requirement, please contact your direct Supervisor **BEFORE** working with the chemical.

We have a strict and enforceable policy on PPE for those employees who are exposed to hazardous chemicals, and will not tolerate employees who violate this policy. Any employee found working with a hazardous chemical without the appropriate PPE will be subject to a written warning. Subsequent disregard for this policy may lead to additional consequences, including possible termination of employment.

EMPLOYEE INFORMATION AND TRAINING

Employees will receive information and training on hazardous chemicals in their work area at the time of their initial assignment, whenever a new chemical hazard is introduced into the work area, or the processes in working with that chemical change. Retraining may be required if management feels an employee does not have a good understanding of the hazards and safety precautions in working with hazardous chemicals. Our Hazard Communication training program will include the following:

- Overview of the requirements of GHS and OSHA's Hazard Communication Standard.
- Review of hazardous chemicals present.
- Physical and health risks associated with those chemicals.
- Physical health symptoms of over-exposure to a particular hazardous chemical.
- How to determine the presence or release of hazardous chemicals in his or her work area.
- How to reduce or prevent exposure to hazardous chemicals.
- Procedures to follow if an employee has been exposed to a hazardous chemical.
- How to read and understand the GHS formatted labels.
- How to read and understand Safety Data Sheets (SDS).
- Location of SDS and written hazard communication program.
- Location of eyewash and shower stations, as well as instruction on how to use both.

NON-ROUTINE TASKS

The Immediate Supervisor of any employee performing a non-routine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed.

Special work permits are required for the performance of certain non-routine tasks, such as entry to confined spaces, breaking and opening piping systems, and hot work. For some special tasks, employees are required to follow special lockout/tagout procedures to ensure that all machinery motion has stopped and energy sources are isolated prior to and during the performance of such tasks.

CONTRACTORS

Prior to beginning work, the Direct Superintendent will inform contractors working on company property of any and all hazardous chemicals that the contractors' employees may be exposed to while performing their work. The Direct Superintendent will also inform contractors of engineering or work practice control measures to be followed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the Direct Superintendent advise contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

The Direct Superintendent will inform contractors of the availability and location of the Safety Data Sheets for any chemical to which contractors' employees may be exposed while performing their work, as well as the location of all eyewash stations and showers.

RECORDKEEPING

Records pertaining to the hazard communication program will be maintained by the Safety Chair or designate, including:

- Inventory of hazardous chemicals.
- Hazardous material reviews.
- Copies of phone call logs and letters requesting Safety Data Sheets.
- Employee training records.
- Warnings issued to employees for not following Gordon H. Baver, Inc.'s hazard communication program.

EXPOSURE EMERGENCIES

If you have been adversely exposed to a hazardous chemical, please seek emergency medical treatment immediately. Notify your immediate supervisor that you have been exposed to a hazardous chemical. Safety Data Sheets should be provided to emergency responders.

For non-emergencies, refer to the First Aid section (Section 4) of the Safety Data Sheet for treatment in the event of exposures. In all events, employees are required to follow up with a medical evaluation.

Our facility has been equipped with an eyewash station(s) in the event of ocular exposure. The eyewash stations can be found on each project by the First Aid Kits or Job Trailers.