

Williamson Roofing

Environmental, Safety & Health Policies

DESCRIPTION: Hazard Communication Program

The purpose of this program is to inform interested persons, including employees, that **Williamson Roofing** is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training our employees.

This program applies to all work operations in our company where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements.

I. HAZARDOUS CHEMICAL INVENTORY:

- A. **Williamson Roofing** relies on the evaluations performed by the chemical manufacturers and importers to identify the potential hazards of the chemicals provided to **Williamson Roofing**. Per EPA Federal definition, any product that contains 1 percent or more of a hazardous ingredient requires that the product be classified as a hazardous material. OSHA considers a product or chemical hazardous if a SDS for it exists. Review of the SDS will reveal if there are any hazardous ingredients within a product.
- B. **Williamson Roofing** has prepared a complete list of all known chemicals (product SDS) used in all phases of operation. This list is known as the Chemical Inventory. Chemicals in the inventory are listed by their chemical or common name as indicated in the appropriate Safety Data Sheet. Information concerning each chemical will be readily available in each work area.
- C. The inventory will be kept in the SDS books at locations available to all employees. The books will be updated as often as necessary to include new products and delete those no longer used.
 1. The inventory will be updated each time a new SDS is received from the manufacturer/importer and not less than once a year.
 2. The Director of EHS will remove hazardous chemicals from the inventory upon further notification from a Manager that:
 - a. There is no further need or use of the chemical in the department;
 - b. Proof that the chemical has either been depleted or sent back to the manufacturer/importer (i.e. amount received versus the amount used/returned); and
 - c. Verification from Purchasing that they have been notified to discontinue ordering the chemical.
 3. The inventory will be reviewed annually by the Director of EHS and Managers for accuracy.

II. SAFETY DATA SHEETS:

- A. Safety Data Sheets are available for each hazardous chemical used at **Williamson Roofing**. Chemical manufacturers or importers develop SDS for hazardous chemicals they produce or import. The chemical manufacturers, importers, or distributors will provide the SDS with their initial shipment of a hazardous chemical or **Williamson Roofing** will immediately contact the chemical manufacturer, importer, or distributor to obtain a copy of the SDS.
- a. The person placing the order will be responsible for ensuring that safety data sheets (SDS) are available for all chemical products ordered by **Williamson Roofing**. If, at the time of ordering, a SDS is not on file, that person will request one from the supplier. If chemical products are ordered through the Purchasing Department, they will be responsible for requesting the SDS from the supplier.
 - b. Upon receipt at **Williamson Roofing**, the receiving individual or department will forward the new or updated SDS to the Director of EHS for filing.
 - c. If an SDS is not available for a chemical product received at **Williamson Roofing**, the Receiving Department or other individual/department receiving the shipment will immediately notify the Manager and the Director of EHS, who will contact the supplier and request a SDS.
2. Each SDS must include information regarding the specific chemical identity of the hazardous chemical(s) involved and the common names. In addition, information must be provided for, but not limited to, the following:
- a. The physical and chemical characteristics of the hazardous chemical;
 - b. Physical hazards of the material, including the potential for fire, explosion, and reactivity;
 - c. Known acute and chronic health effects, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by exposure.
 - d. The primary route(s) of entry;
 - e. Exposure limits (PEL's and TLV's);
 - f. Precautionary and control measures;
 - g. Emergency and first-aid procedures;
 - h. Identification of the organization responsible for preparing the SDS;
 - i. Whether the chemical is considered to be a carcinogen by the National Toxicology Program, International Agency for Research on Cancer and/or OSHA.

NOTE: If the product or a component of a product is listed in Committee Print Number 99-169 of the Senate Committee on Environment and Public Works, titled "Toxic Chemicals Subject to Section 313 of the Emergency Planning and Community Right-To-Know Act of 1986," including any revised version of the list as may be made by the Administrator, the supplier must notify **Williamson Roofing** annually regarding the presence of the listed chemical in the product.

3. Copies of complete SDS binders, for all hazardous chemicals to which employees may be exposed, are kept the Director of EHS's office and at designated locations at each facility. The Director of EHS will maintain the master file of Safety Data Sheets.
 - a. The Manager and Director of EHS will review incoming data sheets for new and significant health/safety information. The Director of EHS will ensure that any new information is given to managers to be communicated to the affected employees.
4. SDS will be kept at the designated SDS areas and will be maintained by the Site Manager, or his/her designate, and made readily accessible to employees in the work area during each work shift. If SDS are not available or new chemicals in use do not have an SDS, the Director of EHS must be contacted immediately

III. LABELS AND OTHER FORMS OF WARNINGS:

- A. Chemicals used by **Williamson Roofing** must be labeled with the identity of the chemical, the appropriate hazard warnings, if necessary, and the name and address of the chemical manufacturer, importer, or other responsible party.
 - 1. Containers of hazardous materials received at **Williamson Roofing** will be checked by the Distribution Department Supervisor, or his/her designate, to make sure the containers are properly labeled. If the labels are found to be improper, the Purchasing Manager and the Director of EHS will contact the importer, distributor, or other responsible party for a proper label.
- B. It is the policy of **Williamson Roofing** that each container in the workplace is properly labeled. Each container must reveal the identity of the chemicals contained therein and must show hazard warnings appropriate for employee protection. Labels must be legible and prominently displayed.
 - 1. Labels on incoming containers of chemicals will not be removed or defaced unless the container is immediately marked with the required information.
 - 2. Upon receipt in the work area, each supervisor will be responsible for ensuring that each container of chemicals in that area is labeled.
 - 3. Tanks and other stationary process containers will be appropriately labeled.
 - 4. Portable containers into which chemicals are transferred from labeled containers must be labeled.
 - 5. After receiving the SDS, the Manager and the Director of EHS will review any changes and alter existing labels if necessary.

IV. EMPLOYEE INFORMATION AND TRAINING:

- A. In an effort to provide a safe workplace, **Williamson Roofing** will provide its employees with information and training on hazardous chemicals in their work area at the time of their initial assignment to that area, and whenever a new hazardous chemical is introduced into their work area. All **Williamson Roofing** workers who may be exposed to hazardous chemicals while performing job duties in assigned work areas will receive training. It is the responsibility of the Director of **Williamson Roofing** and the Site Manager to assure that such training takes place.
 - 1. Employees are informed of:
 - a. The requirements of the Hazard Communication Standard;
 - b. Operations in their work area where hazardous chemicals are present;
 - c. The location and availability of **Williamson Roofing** Corporation's written Hazard Communication Program, the Chemical Inventory, and the Safety Data Sheets;
 - d. How the Hazard Communication Program is implemented at **Williamson Roofing**;
 - e. How to read and interpret information on labels and the SDS;
 - f. How to read our in house labeling system: The HMIS System (Hazardous Materials Identification System);
 - g. How employees can obtain and use the available hazard information;
 - h. The physical and health hazards of the chemicals in their work area;
 - i. Measures employees can take to protect themselves from hazards during routine operations;
 - j. Specific procedures put into effect by **Williamson Roofing** to provide protection such as engineering controls, work practices, and the use of personal protective equipment;
 - k. Methods and observations, such as visual appearance or smell, workers can use to detect the presence of a hazardous chemical to which they may be exposed;
 - l. Emergency procedures to follow if the employee is exposed to chemicals.

2. At a minimum, all employees who are or may be exposed to airborne pollutants at or above the action level will receive additional training as required by the applicable Federal and State regulations.
- B. Upon completion of their training, each employee will sign a form verifying attendance, receipt of written materials and understanding of **Williamson Roofing** policies. The Hazard Communication Verification forms are kept on file in the Environmental/Safety Department's central file.

V. PROCEDURES FOR NON-ROUTINE TASKS:

- A. It is the policy of **Williamson Roofing** that tasks performed by employees, which are not routine and typical day-to-day job tasks, are to be undertaken only after receiving specific information concerning the hazards associated with said activity and the protective measures available to employees. This information will be obtained from the Client and provided to **Williamson Roofing** employees by the Site Manager or his/her designate.
 1. Employees asked to perform non-routine tasks, as well as any other personnel potentially exposed to chemicals involved in the task, will be informed of:
 - a. The chemicals in use and associated with the operation;
 - b. The chemical and safety hazards involved and the protective/safety measures available;
 - c. The measures **Williamson Roofing** and the Client have taken to lessen the hazards, (e.g. ventilation, respirators, presence of another employee, and emergency procedures).

VI. HAZARD COMMUNICATION RESPONSIBILITIES:

- A. The Managers, Director of EHS, receivers in the Distribution Department, and the employees are the primary parties responsible for the implementation of **Williamson Roofing** ' Hazard Communication Program. Their duties are as follows.
 1. Managers:
 - a. Contacting the Director of EHS with information concerning the addition or removal of chemicals from the Hazardous Chemical Inventory.
 - b. Review the Chemical Inventory annually.
 - c. Ensure that all containers of chemicals in the workplace are labeled. Each label should reveal the identity of the chemicals contained therein and the appropriate hazard warnings for their employees' protection. All labels will be legible and prominently displayed.
 - d. Ensure that all tanks and stationary process containers in their area are labeled.
 - e. Notify the Director of EHS when an SDS is not available or new chemicals in use in their area do not have an SDS.
 - f. Ensure all new employees and transferred employees involved in routine tasks receive initial training on chemicals in their work areas and are updated whenever a new hazard is introduced.
 - g. Ensure the employees involved in non-routine tasks receive specific information concerning hazards and protective measures necessary for the job.
 - h. Ensure employees under their supervision are informed of and adhere to **Williamson Roofing** safety policies and procedures.
 - i. Ensure that HazCom is covered as an agenda item in EHS sub-contractor training.
 2. Director of EHS :
 - a. Maintains and updated the Chemical Inventory. The Chemical Inventory is updated periodically with the receipt of new Safety Data Sheets (SDS).

- b. Provides a copy of the updated Chemical Inventory to the Purchasing Department and other individuals/departments responsible for ordering chemical products for **Williamson Roofing**.
 - c. Removes chemicals from the Chemical Inventory upon proper notice that they are no longer used.
 - d. Reviews the Chemical Inventory annually and makes revisions deemed appropriate by him/her and the manager(s).
 - e. Maintains and updates the Master file of SDS.
 - f. Reviews and recommends to managers alterations required for existing labels as required.
 - g. Reviews **Williamson Roofing** ' labeling system annually and updates as required.
 - h. Informs the Client and sub-contractors of hazardous chemicals used in the areas where they will be working, the labeling system used, the location of SDS, and appropriate precautions to be taken.
 - i. Schedule and assist in annual training. Ensure HazCom is covered as an agenda item.
 - j. Oversees employee right-to-know training.
 - k. Maintains the Employee Training records within the employee files. Supplies information as to training needs.
 - l. Ensure that all employees routinely exposed to hazardous chemicals receive initial and additional training as needed or required for hazardous chemicals in their work areas and are updated whenever a new hazard is introduced.
3. Purchasing Department:
Responsible for assuring the chemical products ordered by **Williamson Roofing** have an SDS on file and if not, request an SDS before receipt of the product/chemical.
- a. Individuals/departments other than Purchasing have the same responsibility for products they order.
4. Distribution Department:
- a. Receivers in the Distribution Department ensure that all hazardous materials entering **Williamson Roofing** are labeled with the identity of the chemical, the appropriate hazard warnings, and the name and address of the chemical manufacturer, importer, or other responsible party.
 - b. If hazardous chemicals are received without SDS, the Receiver will notify the Director of EHS. as soon as possible.
 - c. Forward new or updated SDS to the Director of EHS.
 - d. Individuals/Departments other than the Receivers in the Distribution Department, have the same responsibility for products received at **Williamson Roofing**.
5. Employees:
- a. Review warning labels to identify hazardous chemicals and the safety precautions necessary for safe handling and use.
 - b. Know how to use a Safety Data Sheet (SDS) to double check a chemical's safety precautions. Know where to find information concerning personal protective equipment, health hazards, and emergency first aid.
 - c. Wear personal protective equipment as instructed by Management or as required by SDS.
 - d. Follow all **Williamson Roofing** safety and health rules and regulations. Abide by all safe work practices expressed on labels, SDS, and in **Williamson Roofing** training sessions.
 - e. Report hazardous conditions to the supervisor.
 - f. Report any job-related injury or illness to **Williamson Roofing** and seek treatment promptly.