

Teel Consulting Inc

# Hazard Communication Program

## Purpose

At Teel Consulting Inc we value the safety of our employees. The purpose of this program is to inform interested persons, including employees that our organization is complying with the OSHA Hazard Communication Standard 1910.1200 by compiling a hazardous chemicals list, using safety data sheets (SDSs), ensuring that containers are labeled, and training our employees.

This program applies to all work operations at Teel Consulting Inc where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, you, the employee, will be informed of the contents of the "Hazard Communication Standard," the hazards of chemicals with which you work, safe handling procedures, and measures to take to protect yourself from these chemicals.

## Responsibilities

Josh Teel, Teel Consulting Inc, project major, has overall responsibility for the program, including reviewing and updating the program as necessary. The following indicates where this written program may be obtained and the management responsible for its upkeep.

- Online at *teelconsultinginc.com*
- Any company vehicle
- Office space
  - Clinton, Ok
  - Harper, Ks

If, after reading this program, you find that improvements can be made, please contact the Josh Teel. We encourage all suggestions because we are committed to the success of our written "Hazard Communication Program." We strive for clear understanding, safe behavior, and involvement in the program from every level of the organization.

## List of Hazardous Chemicals

Our "Chemical Inventory" is a list of product identifiers of hazardous chemicals known to be present at our workplace. Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are easily identified, whether they are found in a container

or generated in work operations. The hazardous chemicals on the chemical inventory can cover a variety of physical forms, including: liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be initially identified using purchase orders. Identification of other chemicals may require an actual survey of the workplace.

We understand that our workplace is constantly changing due to our scope of work. This is why we strive to have an assessment of our site when we arrive. We take the safety of our employees extremely seriously.

## **Safety Data Sheets (SDSs)**

SDSs are basically fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas. If the SDS is not received in the first shipment, the designated employee must contact the chemicals manufacturer.

### **Labels and Other Forms of Warning**

In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged, or marked in accordance with the following guidelines:

- Labels should contain the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s).
- Labels should contain the product identifier, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the "Hazard Communication Program," will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.
- While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking, because shipped containers of hazardous chemicals must bear this information.
- Hazards not otherwise classified, if any, do not have to be addressed on a container but must be addressed on the SDS.
- Because the product identifier is found on the label, the SDS, and our "Chemical Inventory," the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number. Employees should be aware that label information can be verified by referring to the corresponding SDS.

- A poster is displayed in plain sight to inform employees about the “Hazard Communication Standard.”
- If employees transfer chemicals from a labeled container to a portable, secondary container intended only for their **immediate** use, no labels, tags, or markings are required on the portable container. Otherwise, portable containers must be labeled, tagged, or marked in accordance with our in-house labeling system.

## Labeling Responsibilities

Each employee is responsible to ensure that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are legible, in English (although other languages may also be included), and clearly displayed on the container. These people will also update labels and ensure that newly purchased chemicals are checked for labels when containers are received.

To produce in-house container labels, we use our online corporate “SDS Management Program,” which produces a secondary container label consistent with GHS requirements.

## Training

Everyone who works with or is potentially exposed to hazardous chemicals on the job will receive initial training on the “Hazard Communication Standard,” and the safe use of those hazardous chemicals, before starting work. Because job structure may require employees to occasionally work at another location, all employees are trained in general Hazard Communication.

## Training Occasions

The safety officer ensures all employees are trained on the following occasions:

- Annually
- At hire
- When a new hazard is introduced

**Note:** During training, the consultant also asks for input from employees regarding the training they have received and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical-related illness or injury.

## Training Content

Effective information and training is a critical part of the “Hazard Communication Program.” Our goal is to ensure employees know that they are exposed to hazardous chemicals, have the skills to use labels and SDSs, and understand how to appropriately follow the protective measures we have established.

The format of our general training program is Vivid Learning Systems’ online “Hazard Communication Law” training program.

The training program emphasizes these elements:

- Summary of the “Hazard Communication Standard.”
- Hazardous chemicals present in operations in employee work areas
- Chemical and physical properties of hazardous chemicals (e.g., flash point, reactivity, etc.).
- How to detect the presence or release of hazardous chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)
- Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals, and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, pyrophoric hazards, and hazards not otherwise classified found in work areas.
- Any steps (including engineering controls) the company has taken to reduce or prevent exposure to hazardous chemicals.
- Procedures to protect employees against hazards and exposure.
- Procedures for reporting and responding to chemical emergencies.
- How to read and use both the workplace labeling system and labels received on shipped containers.
- The order of information found on SDSs, how to read the information, and what the information means.
- How to access SDSs, this written “Hazard Communication Program,” and the “Chemical Inventory.”

As location and scope of work change the updated list of used chemicals and workplace hazards are presented at the monthly safety meeting.

## Program Evaluation

Although it is not possible to eliminate all hazards associated with chemicals, we try to remove as many problems as possible to provide a safe environment for our employees. By having the safety officer thoroughly evaluate and revise our “Hazard Communication Program” when necessary, we can eliminate problems effectively.

At Teel consulting Inc, program evaluations, performed by the safety officer involve the following:

- Conducting evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that they continue to be effective;
- Regularly consulting management and employees working with or around chemicals to identify issues. Any problems that are identified during this assessment must be corrected. This is done in our monthly safety meeting.
- Yearly review of our overview and safety program. Jan, 1.
- Contact with other safety programs to ensure that Teel Consulting is always ahead of the curve on employee safety.
- Monthly safety meeting to discuss our program and employee well being.