

## **HAZARD COMMUNICATIONS PROCEDURES**

### **RIGHT-TO-KNOW**

#### **A. INTRODUCTION**

1. The purpose of the **EAGLE INDUSTRIAL INSTRUMENTATION** hazard communication program is to alert employees to the presence of hazardous chemicals and the use of labels & MSDS in the workplace and to show how to work safely with these chemicals. It is Eagle Industrial Instrumentation policy that each individual understand emergency procedures and safety precautions associated with hazardous substances utilized both in the shop and field locations, including any non-English speaking personnel. The program shall be presented to them in their language as well. This written program meets all requirements of 29 CFR 1910.1200, the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard. This program applies and will be made available to all **EAGLE INDUSTRIAL INSTRUMENTATION** locations and their off-site operations where multiple sites are in effect – the program can remain at the primary site. Any questions concerning this policy shall be directed to the Safety Coordinator.
2. This written document shall also be made available for review by any interested employee, authorized client representative, chemical suppliers, or OSHA compliance officer.

#### **B. RESPONSIBILITY**

1. The Manager of Safety and Training is responsible for the training of all employees in hazard communication procedures and for developing, implementing, and maintaining a hazard communication training program.

#### **C. HAZARD DETERMINATION**

1. Since **EAGLE INDUSTRIAL INSTRUMENTATION** does not manufacture chemicals, **EAGLE INDUSTRIAL INSTRUMENTATION** will rely on suppliers of purchased chemicals to conduct hazard determinations and provide Material Safety Data Sheets (MSDS).
2. The Safety Coordinator shall be advised whenever any Eagle Industrial Instrumentation facility plans to introduce a new chemical into the workplace. An MSDS shall be forwarded to the Safety Coordinator for review prior to the purchase of the new chemical. The Safety Coordinator is responsible for evaluating the data and communicating the information

to management, as well as to all affected employees before a final procurement decision is made.

3. The hazard determination process shall be repeated as necessary to insure the MSDS warnings are current. Specifically, updates of MSDS on file should be requested from suppliers at least bi-annually.

#### **D. MATERIAL SAFETY DATA SHEETS (MSDS)**

1. The Safety Coordinator or designee shall be responsible for obtaining the MSDS for each purchased chemical. A MSDS must be on file or included with the first shipment of chemical when received.
2. Copies of MSDS shall be maintained in a file readily accessible to all facility employees. "Readily accessible" means that the employee does not need to contact a supervisor to obtain the information. The MSDS binder is located in the office lobby.
3. If **EAGLE INDUSTRIAL INSTRUMENTATION** is supplying one or more chemicals to a customer, or bringing a chemical into a customer's facility, MSDS for each product will accompany Eagle Industrial Instrumentation the shipment.
4. If a chemical cleaning solution is to be blended at the customer's facility, an MSDS for each component chemical and the resulting blended product shall be included with the job paperwork. An authorized client representative should be asked to acknowledge receipt of this information. MSDS should remain at the job site until work is complete and shall be made available to all workers in the area.
5. Other contractors performing work adjacent to, or in close proximity of "an" **EAGLE INDUSTRIAL INSTRUMENTATION** work site, will be provided with MSDS if requested by the contractor.
6. **EAGLE INDUSTRIAL INSTRUMENTATION** personnel shall request copies of all MSDS for substances in the client facility prior to performing any work with that (those) substance(s).

#### **E. CHEMICAL LISTS**

1. A listing of all chemicals currently in inventory and all chemicals purchased, inventoried, and/or used within the past calendar year shall be maintained by each **EAGLE INDUSTRIAL INSTRUMENTATION** facility. This listing should serve as an index to the MSDS file for each location, with a list maintained at each job site.

2. These lists shall be maintained and updated by the Safety Coordinator. Chemical lists will be periodically reviewed by the Safety and Environmental Committee and made available to senior management upon request.
3. Our list of chemicals consists of the following:

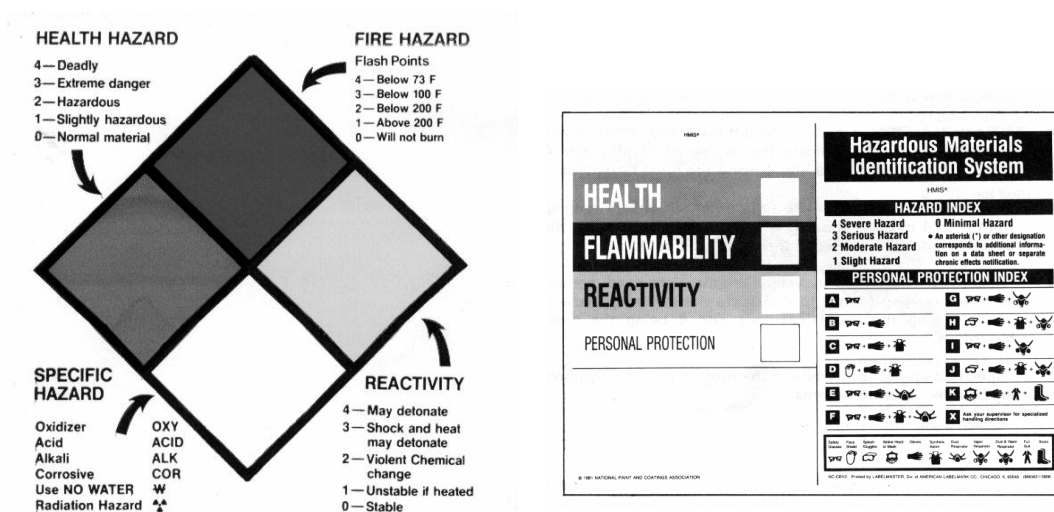
- |                            |                              |
|----------------------------|------------------------------|
| 1. <u>ABC DRY CHEMICLE</u> | 7. <u>MARINE AIR HORNS</u>   |
| 2. <u>PURPLE -K</u>        | 8. <u>409 GLASS CLEANER</u>  |
| 3. <u>MEDICAL OXYGEN</u>   | 9. <u>WD-40</u>              |
| 4. <u>PENTANE</u>          | 10. <u>DERUSTO-GLO PAINT</u> |
| 5. <u>METHANE</u>          |                              |
| 6. <u>CARBON DIOXIDE</u>   |                              |

#### **F. LABELING**

1. The contents of all stationary and portable containers at **EAGLE INDUSTRIAL INSTRUMENTATION** facilities must be readily identifiable. Appropriate hazards warning including name and address of the manufacturer or other responsible party. Employees must be able to identify which MSDS are associated with each container or group of containers. The term "container" includes vessels, tanks, drums, bags, pumps, and lab samples. Piping systems are not considered containers for the purpose of this policy.
2. Eagle Industrial Instrumentation locations that include laboratory facilities are required to provide labels, tags, or other means of identification on all laboratory supplies, lab samples, cans, bottles, or other containers within the lab and lab storage areas.
3. Containers of chemicals purchased by **EAGLE INDUSTRIAL INSTRUMENTATION** must be labeled by the supplier. These labels shall not be removed or defaced for any reason unless the container is emptied, properly cleaned and used for another purpose. They must also identify the chemical, list appropriate warning, as well as the manufacturer.
4. The Safety Coordinator is responsible for ensuring that all on-site containers are properly labeled as described herein.
5. The Safety Coordinator is also responsible for ensuring that all chemical containers leaving a Eagle Industrial Instrumentation facility are labeled in compliance with the OSHA standards. The labeling requirement for shipped

products is in addition to and shall not conflict with any Department of Transportation (DOT) requirements.

6. If it becomes necessary to "create" a label for any mixture of chemicals (other than waste materials) the content and text of such labels shall be determined and reviewed by the Safety Coordinator using the guidelines of the ANSI Z129.1-1982 Labeling Standard. These labels shall be updated as necessary to insure the hazard warnings are current with published toxicity guidelines and physical hazard dates.
7. The following are current labels used by **EAGLE INDUSTRIAL INSTRUMENTATION**:



8. Where applicable, labels such as the ones shown above will be printed in the specific language for non-English speaking personnel.

## G. EMPLOYEE TRAINING

1. Information and documented training shall be provided by the Manager or designee to all field employees upon program implementation. The training shall include successful completion of the Hazardous Materials Training course and associated tests. In addition, the management team shall ensure that an effective, on-going chemical safety training program is in place.
2. Specific information on chemical hazards shall be included in the training which must occur when:
  - a) Employees are newly hired or when they are assigned to a new location or facility for the first time.
  - b) New chemical hazards are introduced to the work site.
  - c) New toxicity or physical hazard information becomes available.

3. The training requirements shall include: (i) a test on the chemical hazards normally encountered in the workplace, (ii) reading and understanding MSDS and labels, (iii) personal protective equipment, and (iv) steps which can be taken to acquire additional information.
4. Training for hazard communication is the responsibility of the Manager of Safety and Training. Employees must be instructed in the following topics: (The provision of written materials to employees will not by itself suffice as training)
  - a) Requirements of the OSHA Standard;
  - b) Operations in the workplace where hazardous substances are present;
  - c) Locations of MSDS, the **EAGLE INDUSTRIAL INSTRUMENTATION** hazard communication program, and the list of hazardous chemicals found in the workplace;
  - d) Methods to detect the presence or release of a hazardous substance in the workplace;
  - e) Physical and health hazards of identified hazardous substances in the workplace;
  - f) Personal protective equipment requirements for handling hazardous substances; and,
  - g) **EAGLE INDUSTRIAL INSTRUMENTATION** hazard communication program.

The Personnel Manager must provide new employees with information on hazardous chemicals in the employee's work area at the time of initial assignment. Training must also be provided when a new chemical is introduced into the work area, and refresher training must be provided on a yearly basis. The Personnel Manager must maintain training records in the employee's personnel file.
5. Any hazards recognized involving non-routine tasks must be documented and communicated to the affected worker by the Safety Coordinator or competent person.

## **H. CONTRACT EMPLOYEES**

1. All Contractors working for **EAGLE INDUSTRIAL INSTRUMENTATION** are responsible for complying with the Hazard Communication Standard as it applies to their business. If Contractors are bringing chemicals to **EAGLE INDUSTRIAL INSTRUMENTATION** facility or work site, such chemicals shall be labeled and a MSDS shall be provided to the Safety Coordinator or his designee.
2. The Safety Coordinator or designee will advise contract employees of any chemical to which they may be exposed while working under the direction of **EAGLE INDUSTRIAL INSTRUMENTATION** personnel. Contract employees shall be given access to information, including labels, MSDS, and chemical inventory lists.

3. Contract employees shall receive training conforming with the requirements of the Hazardous Communication Standard. The Contractor shall certify in writing that such training has occurred.

#### **I. COMMUNICATION REQUIREMENTS FOR "NON-ROUTINE" TASKS**

1. The nature of **EAGLE INDUSTRIAL INSTRUMENTATION** business makes it impractical to provide advance training to all workers on all chemical hazards in the work place. As previously described, all affected employees will receive "generic" training providing a general background of chemical safety awareness. Additional "on the job" training and information may be available through:
  - a) The work order or job report describing the work assignment.
  - b) Work permits issued by the client prior to beginning each job.
  - c) The "tail-gate" Safety Meeting conducted by the on-site supervisor before each job.
  - d) Labels and other markings on containers, equipment, vessels, and operating areas in the client's plant.