

Hazard Communication Written Program

The site superintendent is responsible for the communication and implementation of the program to employees on his job. This is done on a job by job basis since different chemicals are used for different types of construction.

A. Labels and other forms of warning

Labels and other forms of warning for each incoming hazardous chemical will be inspected for compliance with Section (f) of the standard to ensure that proper forms of warning are posted. For hazardous chemicals produced within the facility (such as carbon monoxide and welding by-products), warnings must be posted.

1. The GHS labeling system we will use is as described in 29 CFR 1910.1200 with each label to include the product identifier, signal word, hazard statement(s), pictograms, precautionary statement(s), and name, address, and telephone number of the responsible party.
2. The (fill in the assigned person's job title) is responsible for ensuring that all incoming containers of chemicals are properly labeled.
3. Each person is responsible for reporting unlabeled containers to (fill in person' job title).

B. Safety Data Sheets (SDS)

SDS for each hazardous chemical to which employees are or may be exposed will be obtained and made readily available according to the requirements of section (g) of the standard. For new chemicals, SDS's will be made available prior to use. For hazardous chemicals produced internally (such as carbon monoxide and welding fumes), an SDS may be used or developed to satisfy the physical and health hazard communication requirements.

C. Employee Information and Training

1. Information and training required by section (h) will be provided to all employees at their time of initial assignment for existing hazards, whenever a new hazard is introduced into their work area, and when new information about the hazards is found. Additionally, the Tennessee Hazardous Chemical Right-to-Know Law requires **annual refresher training**.
2. Included in the training will be the health, physical, simple asphyxiation, combustible dust and pyrophoric gas hazards of the chemicals in the work area.
3. Included in the training will be hazards not otherwise classified of the chemicals in the work area.
4. Included in the training will be an explanation of the labels received on shipped containers and the workplace labeling system used.
5. Included in the training will be the safety data sheet information, including the order of information.

6. Employees will be trained to be able to verbally recall fundamental hazards associated with the specific chemicals to which they are exposed.
7. The trainers are (fill in the names of trainers or the job titles)
8. The training will utilize such aids and methods as the following: (Fill in the blank. Suggestions are toolbox talks, classroom training, power point presentation, lecture, quiz)

D. Hazardous Chemical List

We maintain a hazardous chemical inventory list of all chemicals we use of those that we create (such as carbon monoxide and welding fumes). An example of the list layout is below

| Chemical/Component Name | Chemical Abstract Services (CAS) | Product Identifier (Label Identity) | Work area where chemical is normally used or stored |
|-------------------------|----------------------------------|-------------------------------------|---|
| Carbon Monoxide | 630-08-0 | Lift Truck Fumes | Lift Truck Area |
| Propane | 74-98-6 | Propane | Storage Rack |

E. Multi-Employer Activity

Other employers who have employees in our facilities who may be exposed to hazardous chemicals will be provided access to the written hazard communication program. They will be shown the SDS for the chemicals to which they may be exposed and will be informed of any precautionary measures, such as signs and procedures, necessary to protect them during normal operating conditions or in the event of foreseeable emergencies. The labeling system we use will be explained.

Our employees who work in other employer worksites must be afforded the same requirements as in the preceding paragraph before beginning work.

F. Non-Routine Tasks

Periodically, employees are required to perform non-routine tasks which are hazardous. Some examples of how we will address non-routine tasks are: Prior to starting work on such projects, each affected employee will be given information by the safety manager about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

Examples of non-routine tasks are:

- Cleaning the dip tank in the cleaning department
- Emptying the bag house
- Painting the floors and walls