

GHS HAZARD COMMUNICATION PROGRAM

A) HAZARD Communication Program

- 1) The purpose of this program is to inform interested persons, including employees, that our company 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), ensure that containers are labeled or provided other forms of warning, and training of our employees.
- 2) This program applies to all work operations at Uchiyama Manufacturing America LLC (UMA) where employees may be exposed to hazardous chemicals under normal working conditions or during and
- 3) Under this program, our employees will be informed of the contents of the Hazard Communication Standards, 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.
- 4) The EHS Manager has overall responsibility for the program, including to review and update the program as necessary.
- 5) Copies of this written program may be obtained on the department floor computers.
- 6) All employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and the UMA Chemical list from the EHS

B) List of Hazardous Chemicals

- 1) UMA 'Chemical Inventory' is a list of product identifiers of hazardous chemicals known to be present at the workplace.
- 2) Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves.
 - a) That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (i.e. welding fumes, dusts, and exhaust fumes).
- 3) The hazardous chemicals on the chemical inventory can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists.
- 4) Sometimes hazardous chemicals can be identified using purchase orders.
- 5) Identification of other chemicals may require an actual survey of the workplace.
- 6) The EHS Manager updates the hazardous chemical inventory as necessary.
- 7) A Request form (#QF09-008) must be submitted to the EHS Manager BEFORE obtaining a chemical NOT listed on the chemical inventory.
 - a) The EHS Manager and safety Team MUST approve all new chemicals and all documentation (SDS) before entry into the plant.
- 8) Audits of current chemical lists will be performed, findings documented and corrective actions taken to update the chemical list by either eliminating and/or adding to the current list.

C) Safety Data Sheets (SDS)

- 1) SDSs are fact sheets for chemicals that pose a physical or health hazard in the workplace.
- 2) SDS sheets provide our employees with specific information on the chemicals in each work area.
- 3) The EHS Manager is responsible for maintaining the SDSs at UMA and will contact the chemical manufacturer or vendor if additional chemical information is needed.
- 5) SDSs are kept readily accessible to all employees during each work shift on each department computer.
- 6) The procedure followed in the SDS is not received with the first shipment is as follows.
 - a) Receiving personnel will contact EHS Manager who will attempt to locate the SDS online and/or contact the manufacturer to obtain the SDS electronically and immediately.
 - b) If this is unsuccessful, the receiving department will retain the hazardous chemicals in the receiving area until the SDS for the product is received.

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D) Labels and Other Forms of Warning

- 1) In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged, or marked in accordance with the Hazard Communication Standard, with either of the following:
 - a) The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s).
 - b) Labels and product identifiers provide general hazard information - With the help of the Hazard Communication Program, the labels help employees understand specific physical and health risks of hazardous chemicals.
- 2) 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.
- 3) Hazards not otherwise classified (HNOC), if any, do not have to be addressed on a container but must be addressed on the SDS.
- 4) Because the product identifier is found on the label, the SDS and UMA's chemical inventory, the product identifier links these three sources of information, permitting cross-referencing.
 - a) The product identifier used may be a common or trade name, a chemical name, or a number.
 - b) Employees should be aware that the label information can be verified by referring to the chemical SDS.
- 5) Each department supervisor is responsible for ensuring that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are:
 - a) Legible,
 - b) In English (although other languages may be included),
 - c) Displayed clearly on the container or
 - d) Readily available in the work area throughout each work shift.
- 6) Each department supervisor is to also ensure that newly purchased chemicals are checked for labels when containers are received.
- 7) There are chemical stations in the Plant located in the following locations:
 - a) NL-22 area - at the corner near MG Seal Mfg.
 - b) Gasket Mfg - near the oven and parts room.
 - c) Evaluation Lab - for chemicals that must go through Receiving Inspection.
- 8) The Environmental Compliance is responsible for ensuring the proper labeling, tagging, or marking of any shipped containers leaving the workplace.
 - a) These labels, tags, or marks must provide all of the following information:

1. Identifier	4. Pictogram(s)
2. Signal word	5. Precautionary Statement(s)
3. Hazard Statement(s)	6. Chemical Manufacturer, importer or responsible party's Name, address and telephone number.
- 9) HAZCOM posters are displayed throughout the plant in both English and Spanish to inform employees about the GHS / Hazard Communication Standard.
- 10) If an employee transfers a chemical from a labeled container to a portable, secondary container that is intended only for THEIR IMMEDIATE use within the shift, no labels, tags, or markings are required on the portable container.
 - a) Otherwise, portable containers MUST be labeled, tagged, or marked in accordance with UMA's inhouse labeling system for workplace containers.
- 11) UMA's inhouse labeling system in the workplace is GHS labeling
 - a) Identify the chemical in the bottle / container using the GHS label with the most up to date information from the SDS.
- 12) Supervisors are responsible to review and label information as necessary to ensure that all containers have the required GHS label, are legible - if not replace immediately.
- 13) Chemical Storage Inspections conducted weekly and deficiencies are corrected during the procedure.

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D) Employee Training and Information

- 1) All employees that works with or is potentially 'exposed' to hazardous chemicals on the job will receive intial training on the Hazardous Communication Standard and the safe use of those hazardous chemicals before starting work.
 - a) 'Exposure' means the condition of being subjected to a chemical, physical or biological agent in a way that could potentially cause harm.
- 2) All training is conducted by the EHS Manager, Environmental Compliance, Quality Manager or Supervisor.
- 3) All employees receive training for Hazard Communication to:
 - a) Read and understand the Safety Data Sheet information
 - b) Read and understand the GHS labels
 - c) Determine how the information can be obtained and used in the workplace
 - d) Understand the risks of exposure to the chemicals in the work area.
 - e) Ways to protect themselves.
 - f) Urge the employees to ask the EHS Manager questions for greater comprehension.
 - g) Ask employee input regarding the training received for improvement suggestions.
 1. Purpose: to reduce any incidence of chemical-related illness or injury.
- 4) Training frequency:
 - a) Orientation of New Employees
 - b) New employee training per department safety and hazards including chemicals.
 - c) Annual Training of all Employees (done electronically)
 - d) Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided.

E) Training Content

- 1) Training format is a PowerPoint presentation with a question-answer period after training.
 - a) Employees are urged to ask questions for greater comprehension.
 - b) Employees are asked for input regarding the training received and suggestions for improving training.
- 2) The following elements are emphasized in the training:
 - a) Summary of the Hazard Communication Standard
 - b) Hazardous chemicals that are present in operations in employee work areas.
 - c) Chemical and physical properties of hazardous chemicals (i.e. flash point, reactivity, etc.) and how to detect the presence or release of these chemicals (including chemicals in unlabeled pipes) if
 - d) Physical hazards of chemicals (i.e. potential for fire, explosion, etc.)
 - e) Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals and any medical conditions known to be aggravated by exposure to them.
 - f) Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazard not otherwise classified, of chemicals in work areas.
 - g) Any steps the company has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.
 - h) Procedures to protect against hazards and exposure (i.e. work practices or methods to assure proper use and handling of chemicals and any required persoanal protective equipment and its proper use and maintenance).
 - i) Procedures for reporting and responding to emergencies.
 - j) How to read and use both the workplace labeling system and labels received on Shipped containers.
 - k) The order of information found on SDSs and how to read the information and what it means.
 - l) How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

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F) Hazards of Non-Routine Tasks

- 1) Employees are trained for one time use of potentially hazardous chemicals when the need to perform Non-Routine tasks occur.
 - a) Example - the use of Epoxy products to repair damaged concrete flooring

G) Hazards of Unlabeled Pipes

- 1) Work activities are sometimes performed by employees in areas where hazardous chemicals are transferred through unlabeled pipes and if the need arises, the employees will be informed of the hazards of chemicals contained in unlabeled pipes in their work areas through formal training.

H) Multi-Employer Facility

- 1) Contractors or any other employers' workers scheduled to work at UMA, the EHS Manager will:
 - a) Provide the other employer(s) with the SDS for any hazardous chemicals to which their employees may be exposed.
 1. A hard or electronic copy of the SDS will be provided prior to start of work or during the Contractor's Orientation for the hazardous material of concern.
 - b) Relay to the other employer(s) as follows all necessary in-house labeling system and precautionary information for normal operations and foreseeable emergencies during the Contractor Orientation.
- 2) The EHS Manager will obtain from each contractor or other employer the appropriate hazard information on chemicals brought onsite, including SDSs, the labeling system used, and the precautionary measures to be taken in working with or near these chemicals.

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Appendix A

Hazard Communication Standard Pictograms

- As of June 1, 2015, the Hazard Communication Standard (HCS) requires pictograms on labels to alert users of the chemical hazards to which they may be exposed.
- Each Pictogram consists of a symbol on a white background framed with a red boarder and represents a distinct hazard(s).
- The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards

Health Hazard  ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity	Flame  ▪ Flammables ▪ Pyrophoric ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides	Exclamation Mark  ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  ▪ Gases Under Pressure	Corrosion  ▪ Skin Corrosion / Burn ▪ Eye Damage ▪ Corrosive to Metals	Exploding / Bomb  ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
Flame Over Circle  ▪ Oxidizers	Environment (Non-Mandatory)  ▪ Aquatic Toxicity	Skull & Crossbones  ▪ Acute Toxicity (Fatal or Toxic)