

GHS Hazard Communication Program

Hazard Communication Program

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) ensuring that containers are labeled or provided other forms of warning, and training our employees.

This program applies to all work operations at Uchiyama MFG America LLC 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.

Projects, Environmental & Safety Manager, has overall responsibility for the program, including to review and update the program as necessary. Copies of this written program may be obtained on department floor computers. Moreover, all employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical list from the PESM.

Finally, if after reading this program, you find that improvements can be made, please contact the PESM. We encourage all suggestions. We are committed to the success of our written Hazardous Communication Program and strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

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 identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). 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 identified using purchase orders. Identification of other chemicals may require an actual survey of the workplace.

The PESM updates the hazardous chemical inventory as necessary. Prior to anyone obtaining a new chemical, they must submit a request form QF09-008 to the Projects, Environmental & Safety Manager for approval to use the new chemical and that all documentation (SDS) is available before entry into the plant. Additionally, audits of current chemical lists will be performed and documents as to the findings of this audit will be maintained and corrective actions taken to update the chemical list by either eliminating and/or adding to the current list.

Safety Data Sheets (SDSs)

SDSs are 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.

The Projects, Environmental & Safety Manager, is responsible for maintaining the SDSs at our workplace and will contact the chemical manufacturer or vendor if additional chemical information is needed. All new procurements for the company must be cleared by the same.

GHS Hazard Communication Program

SDSs are kept readily accessible to all employees during each work shift on each department computer.

The procedure followed if the SDS is not received with the first shipment is as follows: Receiving personnel will contact PESM who will attempt to locate the SDS online and/or contact the manufacturer to obtain the SDS electronically and immediately. If this is unsuccessful the receiving department will retain the hazardous chemicals in the receiving until receipt of the SDS for the product. If a SDS is not available contact the local OSHA office for assistance.

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 Hazard Communication Standard, either with:

- The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s); or
- The product identifier and 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.

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 (HNOC), 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.

Each departmental supervisor is responsible for ensuring 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 displayed clearly on the container or readily available in the work area throughout each work shift, as required. Each departmental supervisor also ensures that newly purchased chemicals are checked for labels when containers are received. There are chemical label stations in the plant. One is near Hub Seal another is located near the Oven and Parts room.

The shipping department is responsible for ensuring the proper labeling, tagging, or marking of any shipped containers leaving the workplace. These labels, tags, or marks must provide not only the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s) but also the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

HAZCOM posters are displayed throughout the plant in both English and Spanish to inform employees about the GHS/Hazard Communication Standard.

If employees transfer chemicals from a labeled container to a portable, secondary container that is intended only for their IMMEDIATE use within their shift, 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 for workplace containers.

GHS Hazard Communication Program

The in-house labeling system we use for workplace container labeling is GHS labeling. We will identify the chemical in the bottle and label using the most up to date information from the SDS.

Finally, the departmental supervisors review and update label information as necessary, to ensure that labels that fall off or become unreadable are immediately replaced. We also perform weekly chemical storage inspections where if there are deficiencies we will correct them during the procedure.

Employee Training and Information

Everyone who works with or is potentially "exposed" to hazardous chemicals on the job will receive initial training on the Hazardous Communication Standard and the safe use of those hazardous chemicals before starting work "Exposure" means that "an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g., accidental or possible) exposure." Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided. All training is conducted by the Projects, Environmental & Safety Manager, Quality Manager, Training Coordinator or department supervisors. Additionally, there will be training for Chinese and Spanish speaking employees.

Effective information and training is a critical part of the Hazard Communication Program. We train our employees to read and understand the information on labels and SDSs, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas, as well as ways to protect themselves. Our goal is to ensure employees know that they are exposed to hazardous chemicals and have the skills to read and use labels and SDSs, and understand how to appropriately follow the protective measures we have established. We urge our employees to ask the PESM questions for greater comprehension.

As a part of the assessment of the training program, PESM 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.

All employees receive training for hazard communication.

Training Content

The format of the training program used is a PowerPoint presentation with a question-answer period after training.

Department specific training will consist of a quiz after training.

The training program emphasizes these elements:

- Summary of the Hazard Communication Standard
- What hazardous chemicals are present in operations in employee work areas?
- Chemical and physical properties of hazardous chemicals (e.g., flash point, reactivity, etc.) and how to detect the presence or release of these chemicals (including chemicals in unlabeled pipes) if necessary.
- 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 conditions known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.

GHS Hazard Communication Program

- Any steps the company has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.
- Procedures to protect against hazards and exposure (e.g., work practices or methods to assure proper use and handling of chemicals and any required personal protective equipment and its proper use and maintenance).
- Procedures for reporting and responding to emergencies.
- How to read and use both the workplace labeling system and labels received on Shipped containers.
- The order of information found on SDSs and how to read the information and what it means.
- How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

The procedure to train new employees at the time of their initial assignment is provided for general HAZCOM through the new hire orientation. The department supervisors will provide additional training for specific hazardous chemicals such as MEK to personnel that are in direct contact with those chemicals and their job assignments require them to perform tasks with those chemicals. We train employees when a new hazard is introduced by performing training in that specific department as to where the hazard will be.

Training logs are signed by employees upon completion of their training and are kept by Document Control.

Hazards of Non-Routine Tasks

Periodically, employees are required to perform non-routine tasks that involve hazardous chemicals. When employees will be required to perform hazardous non-routine tasks, such as repairing damaged concrete flooring with epoxy products that have the potential to expose employees to hazardous chemicals, we inform them of these hazards by training on the one time use of such products.

Hazards of Unlabeled Pipes

Work activities are sometimes performed by employees in areas where hazardous chemicals are transferred through unlabeled pipes. If the need arises, we will inform employees of the hazards of chemicals contained in unlabeled pipes in their work areas through formal training.

Multi-Employer Facility

When contractors or any other employers' workers will be working at this workplace, the PESM will:

- Provide the other employer(s) with SDSs for any of our hazardous chemicals to which their employees may be exposed: we will provide a hard copy or electronic copy of the SDS prior to start of work or during the Contractor's Orientation for the hazardous material of concern.
- 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 Contractors Orientation.

Moreover, it is the responsibility of PESM to obtain from each contractor or other employer the appropriate hazard information on chemicals they bring onsite, including SDSs, the labeling system used, and the precautionary measures to be taken in working with or near these chemicals.

Additional Information

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the Hazard Communication Standard, applicable SDSs, and the chemical inventory from the PESM










GHS Hazard Communication Program

Appendix A

Hazard Communication Standard Pictograms

As of June 1, 2015, the Hazard Communication Standard (HCS) will require 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 border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards

Health Hazard  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	Flame  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophoric ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	Exclamation Mark  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	Corrosion  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	Exploding Bomb  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
Flame Over Circle  <ul style="list-style-type: none"> ▪ Oxidizers 	Environment (Non-Mandatory)  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	Skull and Crossbones  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)