



HAZARD COMMUNICATION AND SPILLS

Innovations Manufacturing, Inc. (the Company)

Version: 2

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Purpose

The purpose of this program is to ensure the safe use of hazardous chemical substances and to comply with the requirements of OSHA HCS 2012.

Introduction

In 2012, OSHA revised the Hazard Communication Standard (HCS) to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this Hazard Communication Program (HCP) has been revised to comply with the requirements of the OSHA HCS 2012.

It spells out how the Company will inventory chemicals stored and used, obtain and use Safety Data Sheets, maintain labels on chemical substances and train employees about the hazards of chemicals they are likely to encounter on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.
- Using this information is part of our shared commitment to a safe, healthy workplace.

Scope

This program is applicable to all Company employees who may be exposed to hazardous chemical substances. It is important to note that at the time this program was developed, the Company did not store, consume, or use. Or transport chemicals of a bulk nature anywhere in its operations. Other than compressed gas cylinders, the chemicals used in operations at the Company are in small quantities of consumer products which use results in a duration and frequency of exposure that is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended. Regardless, the Company does provide a chemical inventory in the form of Safety Data Sheets for all chemicals regardless of quantity.

Responsibilities

This procedure represents the core of the Company's written Hazard Communication program. This program describes how labels and other forms of warning, safety data sheets, and employee information will be met.

Safety Director or Designee

The Safety Director, or designee, is responsible for administering this hazard communication program. This person is also responsible for:

- Reviewing the potential hazards and safe use of chemicals.
- Maintaining a list of all hazardous chemicals and a master file of SDSs.
- Ensuring that all containers are labeled, tagged or marked properly.
- Providing new-hire and annual training for employees.
- Maintaining training records.

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- Identifying hazardous chemicals used in nonroutine tasks and assessing their risks.
- Informing outside contractors who are performing work on Company property about potential hazards.
- Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state, or local hazard communication requirements.

Employees

- Employees are responsible for following the requirements in the Hazard Communication Program.
- Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.
- All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.
- Identifying hazards before starting a job.
- Reading container labels and SDSs.
- Notifying the supervisor of torn, damaged, or illegible labels or of unlabeled containers.
- Using controls and/or personal protective equipment provided by the company to minimize exposure.
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage and replacement.
- Knowing and understanding the consequences associated with not following the Company policy concerning the safe handling and use of chemicals.
- Participating in the Company training.

Procedure

List of Hazardous Chemicals

An inventory/list of hazardous chemicals is maintained at the company online safety solution center located at www.im-safety.com in the "Right To Know" tab or by going to the following link: <https://im-safety.com/right-to-know>.

The Hazardous Chemical List is updated by the Safety Director as new chemicals are introduced to the workplace. The Hazardous Chemical List is available for access and/or download 27/7/365.

Safety Data Sheets (SDS)

- Safety Data Sheets (SDS) are obtained for all hazardous chemicals. Chemical manufacturers are responsible for developing SDSs. The company shall have a SDS for each chemical used.
- The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is prohibited.
- The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used by the facility.
- Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain SDS libraries and archives.
- The Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current, and is complete. He/she will review the Chemical Inventory List at least annually. When a hazardous material has been permanently removed from the workplace, its SDS is to be removed from the Chemical

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Inventory List. Chemicals that are temporarily removed from the workplace may be maintained in the Chemical Inventory List.

- SDS' for hazardous materials to which Company employees have been exposed must be maintained after the employee leaves the employment of the Company for a period of no less than 5 years from the date of exposure.

Methods to be Used to Inform Employees of the Hazards of Non-Routine Tasks

The methods that the Company will use to inform employees of the hazards of non-routine tasks (i.e., the painting of floors or walls, etc.) and the hazards associated with the non-routine task include:

- Conducting a Job plan that considers the following information:
 - Tasks associated with the job
 - Hazards associated with the tasks
 - Controls to manage the hazards to the lowest risk level as practical
 - The obligation to stop the job if something is not right
 - Change the plan if the job changes in scope or nature of work
- Employees will seek methods of use, special precautions, PPE, and the hazards associated with chemicals and the hazards associated with chemicals they will use in their work areas via the SDS for the product being used.

The Use and Care of Labels and Other Forms of Warning

- Containers of hazardous chemicals are labeled. Container labels should contain the following information:
 - Product identifier
 - Signal word
 - Hazard statement
 - Pictogram(s)
 - Precautionary statement(s), and
 - Name, address and telephone number of the chemical manufacturer, importer, or other responsible party.
- The Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.
- Damaged labels or labels with incomplete information shall be reported immediately.
- Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift.
- If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.
- The Company will use the GHS labeling system for secondary containers.
- Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label.
- If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled.
- Chemical containers received from vendors that are not properly labeled must be rejected.

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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 • Pyrophorics • 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 (harmful) • 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)

Example Label



Training

Employees are provided with information and training on the hazardous chemicals they may be exposed to. Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks supervisors will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The Hazard Communication Program documented training shall, at a minimum, include:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry).
- Operations in the work area where hazardous chemicals are present.
- Location and availability of the hazard communication program, chemical inventory list and SDSs.
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released.
- Explanation of the labels received on shipped containers.
- Explanation of the workplace labeling system.
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.

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The records of employee training are maintained in the Company online safety solution center document management system. Training records are readily available for whomever may have a legitimate reason and business related purpose for accessing such records.

Implementation Requirement

Per OSHA Requirements

Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 1, 2015* December 1, 2015	Compliance with all modified provisions of this final rule, except: The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Chemical manufacturers, importers, distributors and employers
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors, and employers

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