



HAZARD COMMUNICATION



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. This program may be adopted for use by contractors who do not have a formal hazard communication program.

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 Arrow S Energy Operating 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 and contractors at all company sites.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, contractors 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 at www.arrowsenergy.com/hse.
- Providing and using this information is part of our shared commitment to a safe, healthy workplace.

Scope

This program is applicable to all Arrow S Energy Operating employees and contractors who may be exposed to hazardous chemical substances. Because this program meets minimum federal requirements, the contractor's program shall meet the requirements of this program and take precedence. However, this program may be adopted for use by contractors who do not have a formal hazard communication program.

Responsibilities

HSE Director

The HSE Director, or designee, is responsible for administering the 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 who may work with chemicals in company operations.
- Maintaining training records.
- Identifying hazardous chemicals used in nonroutine tasks and assessing their risks.
- Informing contractors who are performing work on Arrow S Energy Operating 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 SDS's.
- 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 Arrow S Energy Operating policy concerning the safe handling and use of chemicals.
- Participating in Arrow S Energy Operating training.

Procedure

List of Hazardous Chemicals

The SDS library located at www.arrowsenergy.com/hse will serve as the chemical inventory list of chemicals known to be present on any Arrow S Energy Operating worksite at any given time. Arrow S Energy Operating does not assume responsibility for managing chemical inventories of contractors.

The Hazardous Chemical List is updated as necessary and at least annually by the HSE Director or their designee.

Safety Data Sheets (SDS)

Safety Data Sheets (SDS) are obtained for all hazardous chemicals. Chemical manufacturers are responsible for developing SDSs. Arrow S Energy Operating shall have an 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 online 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 HSE Director is responsible for seeing that the Chemical Inventory List 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, it is not necessary for the SDS to be removed from the Chemical Inventory List.

SDS's for hazardous materials to which Arrow S Energy Operating employees have been exposed must be maintained after the employee leaves the employment of Arrow S Energy Operating.

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

The methods that Arrow S Energy Operating will use to inform employees of the hazards of non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in their work areas include:

- Conducting a Job Hazard Assessment (JSA).
- Employees will be advised of methods and special precautions, PPE and the hazards associated with chemicals and the hazards associated with chemicals contained in unlabeled pipes in their work areas.
- In the unlikely event that such tasks are required, the supervisor, or designee, will provide an SDS for the involved chemical.

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.

Arrow S Energy Operating 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.

Chemicals that are received from vendors that are not properly labeled must be rejected.

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



Multi-Employer Job Sites

Multi-Employer Job Sites

A pre-job briefing shall be conducted with the contractor prior to the initiation of work on the site.

- During this pre-job briefing, contractors shall notify Arrow S Energy Operating and present current copies of Safety Data Sheets and label information for every hazardous chemical brought on-site.
- Arrow S Energy Operating shall notify and provide required SDS and label information for all hazardous chemicals the contractor may encounter on the job.
- The facilities labeling system and any precautionary measures to be taken by contractor during normal conditions and emergencies shall be addressed.
- By providing such information to other employers, Arrow S Energy Operating does not assume any obligations that other employers have for the safety of their employees.

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.

Formal training will be available at www.arrowsenergy.com/hse

The Hazard Communication Program documented training shall, as 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 SDS's.



- 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.

Records of employee training are maintained electronically.