



SECTION 26

HAZARD COMMUNICATION PROGRAM



1. **SCOPE:** This is the *Hazard Communication Program* concerning the acquisition and dissemination of information for potentially hazardous chemical materials to be used at all Maul Electric, Inc. facilities and job sites. This is a mandatory program for Maul Electric, Inc. and its affiliated companies. The program is designed to communicate hazards associated with chemical materials that employees may potentially be exposed, by any means, during normal activities, or during foreseeable emergencies.

A. This program has been developed to comply with the following standards:

1. OSHA Hazard Communication

- a) General Industry (29 CFR 1910.1200)
- b) Construction (29 CFR 1926.59)

B. The Corporate Safety Director will be responsible for ensuring that this program is implemented in accordance with applicable regulations.

2. CHEMICAL HAZARD EVALUATION PROCEDURES

All chemical materials purchased, used, stored, handled, or distributed by Maul Electric, Inc. employees will be evaluated for potential hazards in accordance with OSHA requirements. All chemical materials will have their respective material safety data sheets (MSDS) stored in a binder within easy access for all employees to review. The term "*chemical material*" includes, but is not limited to, products, raw materials, maintenance, and custodial/janitorial chemicals, compressed gases, solvents, reagents, packaging support chemicals (i.e., inks, dyes, coatings, wrappings, etc.), reprographic chemicals, and office chemicals; whether in pure form, mixtures of more than one material, or compounds formed by the chemical reaction of more than one chemical.

3. EVALUATING HAZARDS OF MATERIALS RECEIVED FROM AN OUTSIDE SUPPLIER

This section applies to all chemical materials that are received from an outside organization for use by Maul Electric, Inc. employees or for reshipment to Maul Electric, Inc. work sites. This part also applies to chemicals used by contractors performing work within Maul Electric, Inc. facilities, even though Maul Electric, Inc. may not have supplied those materials.

Maul Electric, Inc. will rely on the hazard evaluations performed by its chemical manufacturers or suppliers. Therefore, all individuals are responsible for obtaining a *Material Safety Data Sheet (MSDS)* for each new chemical material brought on a site. Normally, additional research on the potential hazards of a chemical will NOT be performed unless the information presented on the supplier's MSDS is questionable.

The Safety Director will ensure that the current chemical inventories for all areas are obtained and updated on a periodic basis. Performing and actual chemical inventory will be the direct responsibility of the project manager, or superintendent, for each facility, work site and/or vessel that obtains or utilizes chemical materials. Each



facility's current chemical inventory of "hazardous" materials will be maintained within the MSDS binder(s) for that location. A copy of All MSDS's received will be forwarded to the Safety Director for inclusion into the Maul Electric, Inc. MSDS records.

When a chemical material is purchased at a retail establishment (i.e., paints, thinners, cleaners, etc.), and when it is used significantly more than the normal consumer would be expected, or when the material is used differently from the intended consumer use, the purchaser will request an MSDS from the retail establishment. If they are unable to provide an MSDS for the product purchased, a request for the MSDS must be made in writing to the manufacturer. A form letter for requesting an MSDS can be found at the end of this program. Forward a copy of any MSDS request to the Safety Director.

If an MSDS is requested by a purchaser of a chemical and an MSDS (or a statement about its non-hazardous nature) is not received within 30 days of a request, or if the received MSDS is obviously unacceptable, contact the Safety Director who will send a follow-up written request to the supplier for additional information.

4. MATERIAL SAFETY DATA SHEETS

A Material Safety Data Sheet (MSDS) must be obtained for each chemical material determined to be "hazardous" by OSHA criteria. The MSDS's must be written in English as required by OSHA. All MSDS's will be reviewed by the Safety Director for adequacy and completeness under the Hazard Communication Standard.

The Safety Director and Site Supervisors will maintain MSDS files. These files will remain accessible to all employees that handle the material during their normal working hours. No employee may be denied access to an MSDS or be required to view its information during shifts other than normal for that individual. If an employee desires, viewing of the MSDS can be performed without management supervision. However, no MSDS may be removed from the file. Copies are permitted after a Supervisor has explained the contents.

MSDS's will be maintained within Hazard Communication binders at each site in a location, which affords all employees easy access.



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- 5. CONTAINER LABELING** It is the **responsibility of each employee** to ensure that, prior to use, all containers of potentially hazardous chemicals used are labeled, tagged, or marked with:
- A.** The **identity** of the hazardous material, i.e., common and/or chemical name, and Chemical Abstract Service (CAS) Registry Number, including the name that appears on the MSDS, and;
 - B.** An **appropriate hazard warning**, which gives an immediate warning and summary of the more important information from the MSDS. In those cases where non-English speaking employees are working at jobsites information will be presented in their language also.
 - C. Note:** Chemical materials supplied to outside contractors by Maul Electric, Inc. must be labeled, tagged, or marked as identified above.

The outside shipping container label may contain the same information as the immediate chemical container, unless that label conflicts with the label(s) required by the Department of Transportation (DOT) for the transportation of hazardous materials.

An employee may transfer or place a hazardous chemical into another “secondary use” container and not label that container as long as it is intended for immediate use by the employee who performs the transfer. If another employee is also to use the container or it will be used for more than one shift, then that new chemical container must be labeled, as above, by the employee who transfers the product.

The contents of a chemical container that is not labeled appropriately may not be used or put into service, unless it is relabeled appropriately or the user is given specific approval from a responsible person. Labels already on any chemical container at any location, and used for any purpose, may not be removed, or defaced unless the contents of the container changes.

Signs, placards, standard operating procedures (SOP's), or similar written material may be used instead of actually placing a label on stationary containers, as long as the written document conveys the same information as is required on a label, and is readily accessible to each applicable employee during their normal working shift. This alternate labeling procedure will only be used after review by the Safety Director for each individual situation. Labels shall be legible, in English. However, for non-English speaking employees, information may be presented in their language as well.

The Purchasing Department will request that suppliers comply with all of the labeling and Material Safety Data Sheet provisions of the Hazard Communication Standard.

6. HAZARD COMMUNICATION TRAINING

The Safety Director will ensure that initial (at the time of assignment) and periodic Hazard Communication Training is provided to all applicable employees regarding the hazardous chemicals in their workplace. However, whenever a chemical that poses a new or different type of hazard enters the workplace, it is the responsibility of each



supervisor to ensure employees are trained. This training will include (but is not limited to) Requirements of this program and a review of the MSDS for that product for the following information:

- A.** Methods of detection and monitoring of the compound (including monitoring devices, appearance and odor);
- B.** Each physical and health hazard that the material presents;
- C.** Personal protective equipment, work practices, and emergency procedures (i.e., fire, first aid, chemical spill, etc.) to be followed while handling;
 - 1. The labeling system for hazardous materials will be legible and in English, but for non-English speaking employees the information will be presented in their language, as it relates to the material;
 - 2. Location of the hazard communication program, listing of hazardous materials present, MSDS's and how employees can obtain and use the appropriate hazard information.
- D.** Procedures for informing employees of the hazards of non-routine tasks, such as equipment maintenance or trailer pesticide application, etc., will be implemented whenever that task involves a hazardous chemical. Each supervisor is responsible for either training each employee or scheduling such training with a responsible person prior to performing any non-routine task.
- E.** Training for non-routine tasks will include:
 - 1. Items 1 through 5 above;
 - 2. Special precautions for the non-routine task; and
 - 3. Other company safety procedures which are relevant to the operation, such as Lock-Out/Tag-Out and Hot Work Permits, etc.
- F.** It is the responsibility of the supervisor in charge of a project to ensure that all employees working in the facility are informed of any hazardous chemicals that they may be exposed to while working in the area. This information will include:
 - 1. Existing hazardous chemicals;
 - 2. Hazardous chemical emissions for processes involved in the work; and
 - 3. Precautions and personal protective equipment which must be worn in the area.
- G.** The Project Manager will be responsible for all actions of the contract employees and will ensure that the outside employees follow all safety precautions that would be used by Maul Electric, Inc. industrial employees.
- H.** Modifications to the content of the training program may be made to best reflect the needs of the needs of the employees at any given facility, or site. Coordination with the Safety Director is highly recommended to ensure correct and consistent training throughout Maul Electric, Inc.



7. DOCUMENTATION OF TRAINING

Whenever training is provided to employees or contractors in accordance with this policy, the individual(s) responsible for providing this training will collect the names (printed), signatures and Social Security numbers of all attending individuals, and the dates and times of the training. Utilize the training roster located at the end of this program. Note that OSHA requires the employee's SSN.

Equipment operators, general laborers, supervisors and management, etc., must be trained prior to being allowed to participate in or supervise field activities. The training should cover the use of personal protective equipment. The training should also cover work practices which minimize hazardous risks and safe use of engineering controls & equipment.

Upon completion of training, forward a copy of the training roster and copies of any additional training material used to the Safety Director. Certificates of training and/or wallet cards will be produced and sent back to the location where the training was performed. These should be presented to the employees for their personal records. Documentation of all training performed will be submitted to human resources for inclusion into the individual's personnel records. Maintain a copy of all training records and certificates at the facility or job site, as a record that training was performed as required by OSHA.



Health & Safety Policy and Procedures Manual

Date: January 1, 2001

**THIS IS AN EXAMPLE MSDS
REQUEST LETTER**

To: American Paint Co.
121 Main Street
P.O. Box 123
Anytown, NJ 12345

Sub: **Request for Material Safety Data Sheet**

The Occupational Safety and Health Administration (OSHA) requires employers to maintain Material Safety Data Sheets (MSDS) for all chemical products used by employees. The employees of Tri-con Construction Co., Inc. use the following chemical products. A review of our records shows that we do not have copies of the MSDS for these products.

Chemical Product:

Product Name	Product Number (if applicable)	Container Size
Jet-Spray, Black	APJS-321	48 oz.
Overcoat Ext. Latex, Blue	EL-12-Blue	5 gal.

Please forward a copy of the MSDS for these products to the following address:

Maul Electric, Inc.
Construction Field Office
Attn: John Smith, Const. Manager
24 East Street
Hometown, PA 54321

Or fax to: (999) 987-6543

Thank you. Should you have any questions please contact me at (999) 987-3456.

Sincerely,
John Smith
Const. Manager



Date: _____

To: _____

Sub: **Request for Material Safety Data Sheet**

The Occupational Safety and Health Administration (OSHA) requires employers to maintain Material Safety Data Sheets (MSDS) for all chemical products used by employees. The employees of Maul Electric, Inc. use the following chemical products. A review of our records shows that we do not have copies of the MSDS for these products.

Chemical Product:

Product Name	Product Number (if applicable)	Container Size

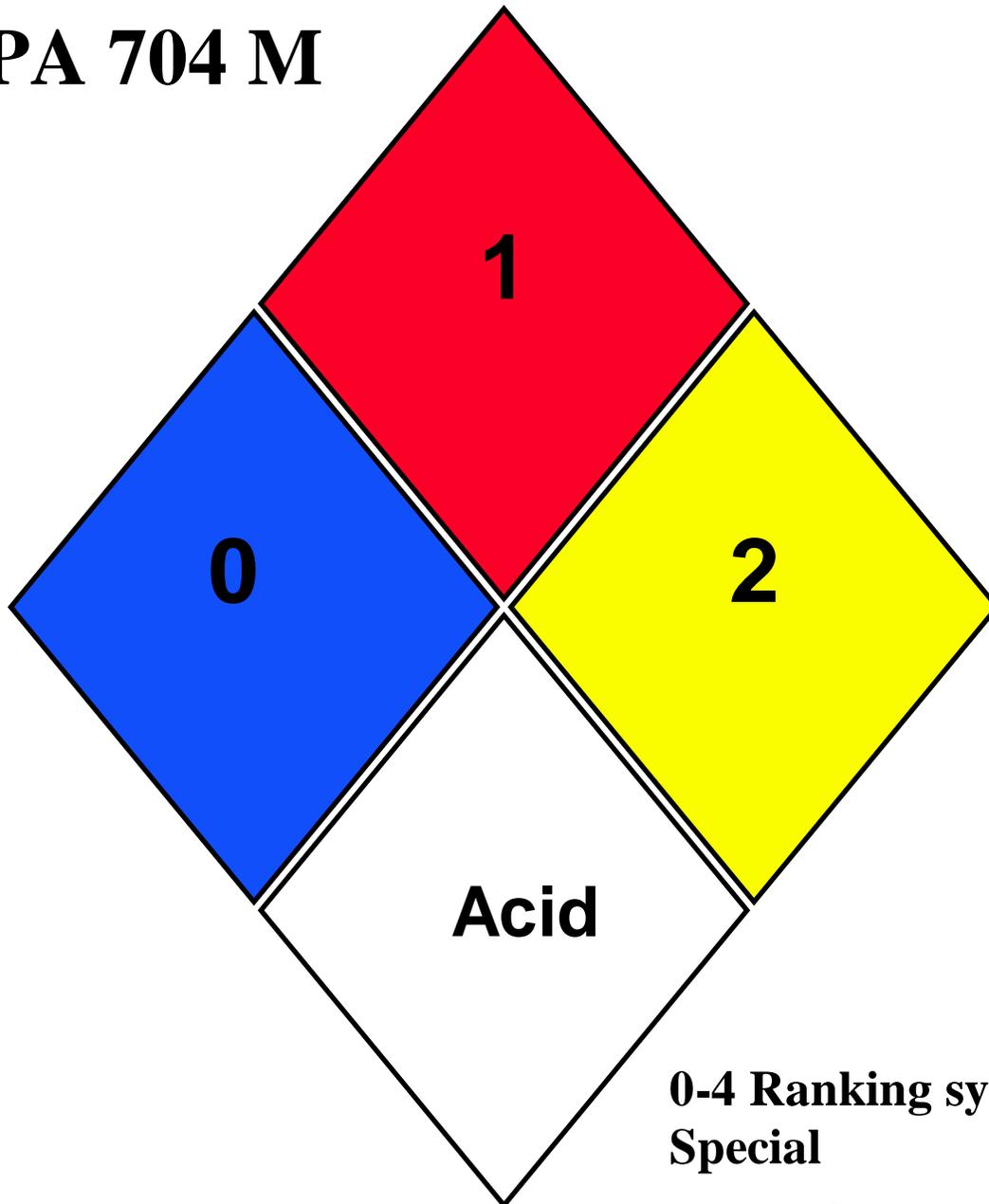
Please forward a copy of the MSDS for these products to the following address:

Maul Electric, Inc.
10 Griggs Drive
Dayton, NJ 08810

Thank you. Should you have any questions please contact me at 732-329-4656

Sincerely,

HMIS NFPA 704 M



0-4 Ranking system
Special

- **Oxy**
- **Acid**
- **Alk**
- **W**