

HAZARD COMMUNICATION PLAN

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I. Applicable Standards

29 CFR, 1910.1200, Hazard Communication

II. Scope

- The program informs Human Active Technologies (HAT) employees of:
 - Hazards associated with chemicals used in the workplace; and
 - Methods to minimize harmful exposures to hazardous chemicals; and
 - Actions to take should exposures to hazardous chemicals occur.

III. Responsibilities

- The **Safety Coordinator** shall maintain copies of this plan in the **Quality Management System** and a hard copy in the **First Aid Room**.

IV. The plan will be used by all personnel and the **Safety Coordinator** shall be responsible for ensuring that the plan is current and enforced.

- The plan will be updated at least annually and also when new chemicals or hazards are introduced into the working environment and/or chemicals no longer being used are removed from inventory.

V. The plan shall be available to employees when first hired and provided to all employees on request. The **Safety Coordinator** should be contacted during normal business hours to review this plan

VI. Purchases

- Chemical or chemical-type substances shall not be brought on premises from any unauthorized outside sources.
- New chemicals purchased shall be the least hazardous chemical available for the stated purpose.
- The **Purchasing Department** will ensure that Safety Data Sheets (SDS) accompany receipt of the first shipment of all chemical.

VII. Chemical Inventory List

- An inventory of all hazardous chemicals on premise shall be documented;
- Chemicals shall be listed by location and include the date of first receipt and date of last use (if no longer being used on-site);
- The list shall be regularly updated and reflect changes in hazardous chemical inventories,

- Annually updated if chemical inventories do not change.
- In accordance with 29 CFR, 1910.1020, the list shall be maintained for thirty (30) years.

VI. Container Labels

A. Received Containers

- The **Warehouse Team Leader or warehouse personnel designee** shall ensure that all containers of hazardous chemicals entering the workplace are properly labelled with the following information:
 - Product identifier
 - Signal word
 - Hazard Statement
 - Appropriate pictograms
 - Precautionary statement
 - Name, address, and telephone number of the chemical manufacturer, distributor, or other responsible party.
- Warehouse personnel shall also ensure that an SDS accompanies the first receipt of all chemicals.

B. In-house Labels

- If chemicals are transferred, to a separate, smaller container, the **Production /Team Leader** of the department shall ensure that the new container is labeled with at least the following information and conform to labelling requirements of the Globally Harmonized System of Classification and Labeling of Chemicals.
 - Product identifier
 - Signal word
 - Hazard statement
 - Appropriate pictogram
 - Precautionary statement or combination thereof.
- **Special Note:** Chemicals transferred to smaller containers and intended for the sole use of the person making the transfer, a label is not required. Should a second person have access to and use the chemical, the new container shall have a label as described above.

- For help with labeling, contact a **Production /Team Leader** or the **Safety Coordinator**.
- **Special Note:** *The Hazardous Materials Identification System (HMIS) label and NFPA's 704 label may be used as supplemental labeling but should not be the sole label on a container.*

VI. Safety Data Sheets (SDS)

- The **Safety Coordinator** shall be responsible for maintaining the SDS system and ensure that a current SDS is on premise for every chemical listed on the Hazardous Chemical Inventory List.
- An SDS should accompany the first receipt of a chemical. Should that not be the case, this procedure will be followed:
 - Contents will be held in the warehouse area.
 - **Warehouse Personnel** will contact **Purchasing** department to contact vendor and request another SDS.
 - If necessary, the **Safety Coordinator** will obtain SDS.
 - On receipt of the SDS, the chemical may be moved to proper ordering department.
- Copies of all SDS shall be kept on **the Quality Management System** under Safety and Health and a hard copy in the **First Aid Room**.
- SDS are reviewed on a continual basis for accuracy and completeness.
- All SDSs will be readily available to all employees during all work shifts using the following procedures and may be viewed in the MDS book located in the **Right to Know** area in the **First Aid Room**.
- If an SDS is not readily available, contact the **Safety Coordinator**.

VII. The SDS System

- A current master inventory list of all SDS will be maintained both in the SDS books and on the Management System, Level II documents, Safety and Health.
- The chemical name or identity used on each SDS will be the same as that used on the container label.
- The chemical and common name of all ingredients determined to present a hazard will appear on all SDS
- When revised SDS are received, the following procedures will be used to replace old SDS:
 - Revised SDS will be reviewed to determine what changes were made.
 - Staff, if affected by the change will be notified and trained on changes.
 - The old SDS will be pulled and filed in an archive file located in **First Aid Room**.

VIII. Contractor Employees

- The **Safety Coordinator** upon notification by the responsible **Supervisor** shall advise outside contractors of any chemical hazards that may be encountered in the normal course of their work on a project, the labeling system in use, the protective measure to be taken and the safe handling procedures to be used.
- Contractors shall be notified of the locations and availability of SDSs.
- Each contractor bringing chemicals on the premises shall provide IOP with the appropriate hazard information on these substances (SDSs), including the labels used and the precautionary measures to be taken in working with hazardous chemicals.
- Contractors are responsible for the disposal/removal of all hazardous materials brought on premises and used by contracted workers.

IX. Additional Information

- All employees or their designated representatives can obtain further information on this written program, the hazard communication standard, applicable SDSs and chemical information lists by contacting the **Safety Coordinator**.

X. Employee Training and Information

- The **Safety Supervisor** is responsible for employee training. Prior to starting work, each new employee will attend orientation and will receive information and training on the following:
 - Chemicals present in the workplace.
 - Location and availability of this written hazard program.
 - Physical and health effects of the hazardous chemicals.
 - Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area. Yellow is alignment
 - How to lessen or prevent exposure to these hazardous chemicals through use of control/work practices and personal protective equipment.
 - Steps that have been taken to lessen or prevent exposure to hazardous chemicals.
 - Emergency procedures to follow if employees are exposed to hazardous chemicals.
 - How to read labels and review SDSs to obtain appropriate hazard information.

- Prior to a new hazardous chemical being introduced into any area, each employee of that area will be given information as outlined above.
- The **Safety Supervisor** is responsible for ensuring that an SDS on any new chemical is available.

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HAZARD COMMUNICATION Contractor Acknowledge Form

Contractor Company name _____

Address _____

Address _____

City, State, zip _____

Phone number: _____

Contractors coming on Human Active Technologies (HAT) premises shall have written safety policies covering the work to be performed. All work shall comply with applicable OSHA regulations and reflect safe work practices.

The *Hazard Communication Standard, (29 CFR, 1910.1200)* requires contractors working on company property to be informed by the **Facilities Team Leader** of potential exposures to hazardous chemicals and appropriate protective measures that should be taken.

Contractors will be informed on the following:

- Hazardous chemicals to which they may be exposed while in the workplace
- The hazardous chemical labelling system used by IOP employees.
- Location of Safety Data Sheets (SDS) for all hazardous chemicals
- How to access SDSs if needed

Contractor shall inform and provide an SDS for all hazardous chemicals being brought on IOP property. The **Facilities Team Leader** shall review the SDS to ensure that hazard controls currently in place are adequate to protect employees.

Removal and disposal of all hazardous materials brought on premises is the responsibility of the contracting company bringing them on premises.

The **Facilities Team Leader** will verify that a Certificate of Insurance is on file before allowing any contract work to begin on HAT property.

This document shall be executed prior to beginning any contracted work.

