

Commonwealth Scaffold, LLC

Hazard Communication Program and Training Materials

Effective Date:
Revision #:



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Commonwealth Scaffold, LLC
**Hazard Communication
Program**

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OSHA

Reference Standard

Occupational Safety and Health Administration: 29 CFR 1910.1200, Subpart Z - Hazard Communication

Purpose

This procedure establishes minimum requirements for the following:

- Identification and labeling of hazardous chemicals.
- Employee access to hazardous chemical information.
- Training required to prevent injury or illness due to hazardous chemical exposure.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, as well as all other individuals who are visiting or have business with our company.

Responsibilities

- Management is responsible for identifying hazardous substances and for maintaining this program. Management will review this procedure at least annually and when new hazardous substances are introduced.
- Management and supervisors are responsible for the implementation and enforcement of this program.
- Employees must comply with all procedures outlined in this policy.
- Contractors and vendors shall comply with all procedures outlined in this policy.

Definitions

Article: A manufactured item other than a fluid or particle:

- Which is formed to a specific shape or design during manufacture;
- Which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- Which under normal conditions of use does not release more than very small quantities (for example: minute trace amounts of a hazardous chemical and does not pose a physical or health risk to employees).

Chemical: any element, chemical compound or mixture of elements and/or compounds.

Container: any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Contractor: A non-company employee being paid to perform work in our facility.

Hazardous Chemical: a chemical that is a physical or a health hazard.

Health Hazard: A chemical that is carcinogenic, toxic, a reproductive hazard, an irritant, a corrosive, a sensitizer, or damages anybody system or part.

Material Safety Data Sheet (MSDS): An MSDS is a written document prepared by the chemical manufacturer or supplier that details the contents, hazards, proper use directives and emergency response protocol for a hazardous chemical.

Physical Hazard: A chemical which is a combustible liquid, a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable, or water reactive.

Vendor: A non-company employee performing a service in our facility.

Program Application

This program will be applicable to all chemicals that exhibit or could exhibit health hazards or physical hazards under normal operating conditions or during emergencies. However, the following materials are exempt from this program:

- Consumer products when used in the workplace in a duration and frequency that is not greater than that experienced by a regular consumer;
- Articles (see Definition above);
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (for example, tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (such as over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (for example, first aid supplies);
- Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- Wood or wood products that will not be processed (wood treated with hazardous chemicals, or that will be processed generating dust are not exempt);
- Food and alcoholic beverages in retail establishments and food that will be consumed in the workplace; and
- Tobacco and tobacco products.

Procedures

Material Ordering and Hazard Determination

Any employee wishing to introduce a new chemical into the facility must obtain an MSDS and submit the MSDS to the program administrator prior to ordering the chemical. The program administrator will evaluate all new or replacement chemicals to determine if the chemical presents health hazards for our employees or to our facility.

If the program administrator determines that the new chemical cannot be handled safely, the chemical will not be ordered. Information on new chemicals, or new information pertaining to chemicals that are currently used will be communicated to affected employees by the program administrator. Every effort will be made to select chemicals that are not hazardous or that present the minimum degree of hazard commensurate with necessary chemical capability.

Hazardous Chemical List

A list of hazardous chemicals currently used within the facility will be maintained by the program administrator (see Appendix A for the Hazardous Chemical Inventory). As new chemicals are purchased, the necessary information will be added to the Inventory. Obsolete chemicals will be removed from the List.

Material Safety Data Sheets

A MSDS will be maintained for all hazardous chemicals, including those purchased at retail locations. The MSDS will be available to all employees on all shifts. If our plant decides to use electronic means to

maintain the MSDS file, employee availability will be assured including at all times including during power failures.

The program administrator will contact the chemical supplier or manufacturer and request an MSDS for chemicals held in quarantine or refused by receiving.

The MSDS file and Hazardous Chemical List will be maintained in the following location(s):

[Add locations here]

Obsolete MSDS will be removed from the active file and will be maintained in a separate file by the program administrator for 30 years.

Labels and Other Hazard Warnings

All containers containing hazardous chemicals will be labeled with the following information:

- The identity of the hazardous chemical; and
- The appropriate hazard warnings alerting employees of the health and physical hazards presented by the chemical.

Solid metal, wood and plastic not exempted as articles, as well as grain will not be labeled but will have label information available within the MSDS.

All incoming hazardous chemicals containers will be inspected by receiving personnel. Containers that are not properly labeled will be labeled by the receiving personnel. Containers with hazardous contents that are not listed on the Hazardous Chemical List will be refused or will be placed in quarantine and the program administrator notified immediately.

The program administrator must approve all labels used within our facility. Each departmental supervisor is responsible for insuring that all hazardous chemical containers, including containers that are refillable from bulk containers, are labeled properly and that the label is visible. Stationary tanks, reservoirs and sumps containing hazardous chemicals will also be labeled.

Labels will not be removed or covered over.

Training

Training as outlined below will be provided at the following times:

- At time of initial assignment;
- Whenever a new hazardous chemical is introduced, or when the hazard information regarding a currently used chemical changes or when the program elements change; and
- Whenever the program administrator or other management members determine through observation that retraining would be beneficial.

Training will consist of a(n):

- Overview of this program;
- Review of operations where hazardous chemicals are present;
- Location of the written hazard communication program, hazardous chemical list and MSDS file;
- Methods and observations used to detect the presence or release of hazardous chemicals;
- Physical and health hazards of chemicals in the work area (Note: we will present categories of hazards and advise employees to review labels and MSDS for chemical specific information);
- Measures that employees are required to take to protect themselves from hazards including: procedures, work practices, emergency procedures and personal protective equipment requirements; and
- Explanation of the labeling system and how to read an MSDS so that this information can be used appropriately by all personnel.

Non-Routine Tasks

Whenever a non-routine job involving work with hazardous chemicals is required, special training will be provided for all affected employees prior to the job. The training will include:

- Hazardous chemicals to be used in the non-routine task;
- Protective measure required to perform the work safely;
- Emergency procedures; and
- An opportunity to ask questions or ask for additional information

Contractors

Contractors who will bring hazardous chemicals into our facility must:

- Provide the program administrator with a list and an MSDS for each hazardous chemical that will be used in our facility;
- Maintain a copy of the MSDS for each approved chemical on site;
- Not bring chemicals into our facility unless approved by the program administrator; and
- Comply with all provisions of the Hazard Communication Standard that is applicable to their company.

Our Company reserves the right to refuse the use of chemicals based upon our evaluation. We also reserve the right to terminate the use of chemicals at any time based upon variable conditions within our facility.

Contractors will be provided the following information whenever their work location could bring them into contact with our hazardous chemicals.

- The hazardous chemicals that they may be exposed to while performing the specified work and how to obtain a copy of appropriate MSDS
- Necessary job precautions to work safely within the proximity of the chemicals involved.

Revision History Record:

Revision Number	Section	Revised By	Description
0	NA	NA	Original document.

Appendix A

PLAYING IT **SAFE**

Be safe and healthy on the job at Commonwealth Scaffold, LLC with these helpful tips provided by Allied Insurance Brokers, Inc..



Hazard Communication Program

Managing Hazardous Chemicals

Through the course of your job duties, you may be required to work with dangerous chemicals. Commonwealth Scaffold, LLC is dedicated to ensuring your safety, so we have a Hazard Communication Program in place. The goal of this program is to make you aware of chemicals you may be in contact with on the job and to help you understand the potential hazards of those chemicals. This education, which is required by the Occupational Safety & Health Act (OSHA), is also called Workers' Right To Know.

Material Safety Data Sheets

One important key to a Hazard Communication Program is the Material Safety Data Sheet (MSDS). This sheet tells you everything you need to know about a specific chemical, including: The health hazards associated with the chemical
How flammable the product is, and at what temperature it may ignite
The reactivity of the chemical with water or other agents and how likely it is to explode
What personal protective equipment (PPE) is needed to work with the chemical

The MSDS form can be lengthy, which is why we also provide MSDS Information Review Forms for the chemicals you may encounter in the workplace. Though you should also know where the complete MSDSs are, and should refer to them when specific details are needed, the Information Review Form is an easy-access, user-friendly version of a chemical's essential information.

Other important aspects of the Hazard Communication Program include:

Accurate labeling of containers that contain chemicals, including warning labels when applicable.
Ensuring that labels are not removed.
Employee training in accordance with your job duties relating to chemicals.

Important Questions to Ask

Through our Hazard Communication Program, every employee should learn the following information:
What chemicals might I handle or be exposed to in the workplace?
Where are the MSDSs kept for the chemicals I am exposed to?
What kinds of hazards do I face when I use, or misuse, a particular chemical?
Do I understand the emergency procedures to follow in the event of a spill?

Though it is our goal to teach you the information you need, it is your responsibility to learn it and ask questions if necessary. You should follow all safety procedures when working around chemicals, keep in mind potential hazards and always wear appropriate PPE. You are also entitled to obtain a written copy of our Hazard Communication Program – simply ask your supervisor.



Achieving Safety Together

It may seem overwhelming to learn about all the chemicals you may handle or be exposed to, but it is important knowledge that all workers should have. Always be sure to ask questions or reference the appropriate MSDS if you forget or have yet to learn about a certain chemical.

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HAZARD COMMUNICATION PRESENTATION

INSTRUCTOR NOTES

The following provides a useful preparation outline for use by trainers presenting the Hazardous Communication (Haz-Com) presentation to employees. The presentation, along with an MSDS Vendor Request Letter and Hazard Communication Request Letter to Contractor, are available from Allied Insurance Brokers, Inc..

Training Objectives

- Review the Hazard Communication program and elements including labeling, Material Safety Data Sheets and the need for training.
- Train employees how to handle workplace chemicals properly.

Before Training

- Read the OSHA standard and the model Haz-Com program
- Choose two or more examples of Material Safety Data Sheets to use for training
- Bring the following to show employees:
 - A copy of the Hazard Communication Program
 - A copy (or a partial copy) of the Hazardous Chemical List
 - The MSDS file (or a part), unless the file is maintained electronically

Introduction for Training

- Begin by stressing the overall importance of safety in your facility
- Give examples of where chemicals are used in the facility and how the employee(s) job(s) will be impacted by chemical use
- Introduce the topic of hazard communication by providing a general explanation of the terms:
 - Hazard Communication (a regulation that assures that workers receive information regarding the chemicals they work with)
 - Hazardous Chemical List (the list of all hazardous materials in our facility).
 - Material Safety Data Sheet (a document containing information on the chemical contents, the hazards and safe use guidelines)
- As a ground breaker, ask employees what chemicals they have used in past jobs or as part of hobbies

General Guidelines

- Stress the importance of the bullet points on these slides
- Stress the importance of the individual employee being committed to his/her own safety
- Be sure to be open to questions or comments

Hazard Communication Slide

- Show the written program and explain that it is the “instruction manual” used by Management to ensure safe chemical handling
- Identify the individual(s) in the facility who can be contacted for questions or concerns

Chemical Hazards Slide

- Physical hazards occur because of the chemical properties of the material and include fire, explosion, etc.
- Health hazards occur because of the chemical's action on the human body and include toxic (poison) actions and burns from acid
- Use a few examples of facility chemicals and review the general hazards

Container Label Slide

- Show an example of a label used in the facility
- Explain how to read and follow the label information
- Advise employee(s) how to replace damaged or missing labels

Material Safety Data Sheet Slide

- Use a facility MSDS and read and explain the sections to employee(s)

Facility Chemical Review Slide

- This slide is intended to facilitate classroom training in preparation for on the job training, which is the intent of the next slide, "On the Job Training"
- Discuss chemicals that the employee(s) will work with or around
- Ask a supervisor or other qualified worker to provide technical information that you are not aware of
- Training can cover categories of chemicals or individual chemicals (examples of categories of chemicals are: different grades of metal working fluid or different colors of paint that share the same hazardous chemical constituents)

Conclusion

- Review the important points listed on the "Conclusion" slide

Employee Exercise

At the conclusion of the training the following activities will demonstrate the employees' understanding of the topic:

1. Ask the employee to find two random material MSDS from among chemicals in the facility
2. Ask the employee to explain key points covering safe handling of chemicals that he or she will use
3. Ask the employee to identify the following:
 - the location of the MSDS file and the Hazardous Chemical List
 - who can be contacted for more information on chemical handling

HAZARD COMMUNICATION QUIZ

Name: _____ Date: _____ Score: _____

Place a check mark on the line with the best answer for each of these 10 questions:

1. The Hazard Communication standard is known as:
a. Right to Know
b. The Bill of Rights
2. You have a Right to Know:
a. What your supervisor is thinking
b. About the chemicals in your work area
3. There are two types of hazards that chemicals can possess, they are:
a. Physical and Health Hazards
b. Electrical and Mechanical
4. Routes of exposure include inhalation, ingestion and absorption:
a. True
b. False
5. Labels are required on all containers with hazardous chemical contents:
a. True
b. False
6. MSDS stands for:
a. Management Standard Development System
b. Material Safety Data Sheet
7. A good safety practice is to read labels and the MSDS before using a new chemical:
a. True
b. False
8. 8. If you have questions regarding chemical safety you should ask:
a. Someone who has more experience in the facility than you do
b. Your supervisor or the program administrator
9. 9. When working with chemicals you should:
a. Always change your procedure so you do not get bored
b. Always perform the job the way you were trained
10. I need to remember:
a. The location of the Hazardous Chemical List and the MSDS File
b. The location of the coffee pot

