

### Rev 1

## 1. Purpose:

**1.1** The purpose of this procedure is to outline the Hazard Communication Program.

# 2. Responsibility:

- **2.1** The Environmental Health and Safety (EHS) Manager is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.
- **2.2** The EHS Manager and/or Supervisors are responsible for implementation of this procedure, and training of all employees with regard to this procedure.

# 3. References:

**3.1** 29 CFR 1910.1200 Hazard Communication.

# 4. Hazard Communication Program

# 4.1 Company Policy

- To ensure that information about the dangers of all hazardous chemicals used by DeLong's, Inc. is known by all affected workers, the following hazard communication program has been implemented. Under this program, workers will be informed of the requirements of the OSHA Hazard Communication Standard, the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and Safety Data Sheets (SDSs).
- This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available in the EHS Manager's Office for review by any interested worker.

# 4.2 Container Labeling

• The EHS Manager and/or the employee receiving shipments will verify that all containers received for use will be clearly labeled in accordance with the requirements of HazCom 2012, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier's contact information (name and address).

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• The EHS Manger and/or Supervisor in each work area will ensure that all secondary containers are labeled in accordance to Procedure #CS-003 Labeling of Secondary Containers. For help with labeling, see the EHS Manager.

#### 4.3 Safety Data Sheets (SDSs)

- The EHS Manager is responsible for establishing and monitoring the company SDS program. Copies of SDSs for all hazardous chemicals to which workers are exposed or are potentially exposed will be kept in the EHS Manager's office. Copies will also be placed in the plant for immediate use by the employee. SDSs will be readily available to all workers in each work area during each work shift. If an SDS is not available, contact the EHS Manager.
- The EHS Manager is responsible for reviewing the SDSs received for safety and health implications, and initiating any needed changes in workplace practices.

#### 4.4 Employee Information and Training

- The EHS Manager and/or Supervisors are responsible for employee information and training.
- Every worker who will be potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication standard and this program before starting work. The training program for new workers is comprised of video, classroom lecture, and/or interactive computer programs for the following topics:
  - An overview of the requirements contained in the Hazard Communication Program.
  - Chemicals present in their workplace operations.
  - Physical and health effects of the Hazardous Chemicals.
  - How to reduce or prevent exposure to these hazardous chemicals through usage of work practices and personal protective equipment (PPE).
  - Emergency procedures to follow if they are exposed to these chemicals.
  - How to read labels and SDSs to obtain appropriate hazard information
  - Location of SDSs and hazardous chemical list.
- Prior to introducing a new chemical hazard into any work area, each worker in that work area will be given information and training as outlined above for the new chemical hazard.
- Training and information will be provided to employees whenever a new category of hazardous chemical is introduced into our operation, or if assigned job duties change.

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• Annual refresher training will be given to all employees.

## 4.5 Hazards of Non-routine Tasks

- Periodically, workers are required to perform non-routine tasks that are hazardous such as:
  - Confined space entry
  - Tank cleaning
  - Painting vessels
- Prior to starting work on such projects, each affected worker will be given information by the EHS Manager and/or Supervisors about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the worker should use, and, if applicable, steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another worker (buddy systems), and emergency procedures.

## 4.6 Informing Other Employers/Contractors

- It is the responsibility of the EHS Manager and/or Supervisors to provide other employers and contractors with information about hazardous chemicals that their workers may be exposed to on this work site, and suggested precautions for workers. It is the responsibility of the EHS Manager and/or Supervisors to obtain information about hazardous chemicals used by other employers to which our workers may be exposed.
- Other employers and contractors will be provided SDSs for hazardous chemicals generated by this company's operations. In addition to providing a copy of SDSs to other employers, other employers will be informed of necessary precautionary measures to protect workers exposed to operations performed by this company.
- Other employers will be informed of the hazard labels used by DeLong's, Inc..

## 4.7 List of Hazardous Chemicals

- A list of all known hazardous chemicals in the workplace is maintained and located in the EHS Office. This list includes the name of each chemical, and the work area(s) in which each of the chemicals is used. Further information on each chemical may be obtained from the SDSs, located in the EHS Office.
- When new chemicals are received, this list is updated within 15 days of introduction into the workplace.

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• The hazardous chemical inventory is compiled and maintained by Jeremy Johnson, EHS Manager, (573)635-6121.

#### 4.8 Chemicals in Unlabeled Pipes

• Work activities may be performed by workers in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the worker shall be informed by the EHS Manager and/or Supervisors about the identity and hazards of the chemicals in the pipe, as well as required precautionary measures required to be followed.

#### 4.9 Program Availability

• A copy of this program will be made available, upon request, to workers, their designated representatives, and OSHA.

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