

Hazard Communication Program

Our Hazard Communication Program

General Company Policy

The purpose of this notice is to inform you that our company is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, by using MSDS's, by ensuring that containers are labeled, and by providing you with training.

This program applies to all work operations in our company where you may be exposed to hazardous substances under normal working conditions or during an emergency situation.

The safety and health (S&H) manager, Allen House, is the program coordinator, acting as the representative of AzRA\Discovery. Allen House will review and update the program, as necessary. Copies of the written program may be obtained from Mr. House in Company office.

Under this program, you will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which you work, safe handling procedures, and measures to take to protect yourselves from these chemicals. You will also be informed of the hazards associated with non-routine tasks.

List of Hazardous Chemicals

The safety and health manager will make a list of all hazardous chemicals and related work practices used in the facility, and will update the list as necessary. Our list of chemicals identifies all of the chemicals used in work process areas. A separate list is available for each work area and is posted there. Each list also identifies the corresponding MSDS for each chemical. A master list of these chemicals will be maintained by, and is available from Allen.

Material Safety Data Sheets (MSDS's)

MSDS's provide you with specific information on the chemicals you use. The safety and health manager, will maintain a binder in his office with an MSDS on every substance on the list of hazardous chemicals. The MSDS will be a fully completed OSHA Form 174 or equivalent. Allen will ensure that each work site maintains an MSDS for hazardous materials in that area. MSDS's will be made readily available to you at your work stations during your shifts.

The safety and health manager is responsible for acquiring and updating MSDS's. He will contact the chemical manufacturer or vendor if additional research is necessary or if an MSDS has not been supplied with an initial shipment. All new procurements for the company must be cleared by the safety and health manager. A master list of MSDS's is available in the office and in the warehouse

Labels and Other Forms of Warning

The safety and health manager will ensure that all hazardous chemicals are properly labeled and updated, as necessary. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The warehouse staff will refer to the corresponding MSDS to assist you in verifying label information. Containers that are shipped from the plant will be checked by the supervisor to make sure all containers are properly labeled.

If you transfer chemicals from a labeled container to a portable container that is intended only for your immediate use, no labels are required on the portable container.

Non-Routine Tasks

When you are required to perform hazardous non-routine tasks (e.g., patching in confined spaces, etc.), a special training session will be conducted to inform you regarding the hazardous chemicals to which you might be exposed and the proper precautions to take to reduce or avoid exposure.

Training

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals by the safety and health manager. Whenever a new hazard is introduced, additional training will be provided. Regular safety meetings will also be used to review the information presented in the initial training. Monitoring of safe work practices is part of this program.

The training plan will emphasize these items:

- Summary of the standard and this written program.
- ! Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., personal protective equipment required, proper use, and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures

for emergency response).

- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- Where MSDS's are located, how to read and interpret the information on both labels and MSDS's, and how employees may obtain additional hazard information.

The safety and health manager or designee will review our employee training program and advise the plant manager on training or retraining needs. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace, but it will be company policy to provide training regularly in safety meetings to ensure the effectiveness of the program. As part of the assessment of the training program, the safety and health manager will obtain input from employees regarding the training they have received, and their suggestions for improving it.

Contractor Employers

The safety and health manager upon notification by the responsible supervisor, will advise outside contractors in person of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition, Allen House will notify these individuals of the location and availability of MSDS's. Each contractor bringing chemicals on-site must provide us with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

Additional information

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable MSDS's, and chemical information lists at the safety and health office.

Documented HAZCOM Program

- I Reflects what is specifically being done in the workplace to comply with the HAZCOM Standard.**
- Includes the following:**
 - I List of hazardous chemicals**
 - I Identification of person/people responsible for complying with the HAZCON1 Standard**
 - I Location of written materials available to employees**
 - I How concessioner will meet requirements for:**
 - I Labeling**
 - I MSDSs**
 - I Employee information and training**

I Explain and show employees where to find documented HAZCOM Program

HAZCOM Standard (29 CFR 191 0.1200) Purpose

- I To ensure that information concerning hazardous chemicals is transmitted to employers and employees.**
- I To ensure that requirements for HAZCOM in workplace settings are consistent nationwide.**

Hazard Communication

- I The HAZCOM Standard**
- I Definition of a Hazardous Chemical**
- I List of Hazardous Chemicals Used**
- I How to Detect Hazardous. Chemical Releases**
- I Personal Protective Equipment**
- I Labeling System**
- I Material Safety Data Sheets (MSDSs)**
- I Hazardous Chemical Inventory I Documented HAZCOM Program**

Definition of a Hazardous Chemical

Physical Hazard. Any chemical that is:

- | A combustible liquid
- | A compressed gas
- | Explosive
- | Flammable
- | An organic peroxide (chemicals that are usually fire and explosive hazards)
- | An oxidizer
- | Pyrophoric (i.e., chemicals that spontaneously ignite)
- | Unstable (i.e., reactive)
 - | Water-reactive

Health Hazard. Any chemical that may produce acute or chronic health **effects in exposed employees. Examples are:**

- | Carcinogens (i.e., cancer-causing chemicals)
- | Toxic agents
- | Reproductive toxins
- | Irritants
- | Corrosives
- | Sensitizers
- | Hepatotoxins (i.e., liver toxins)
- | Nephrotoxins (i.e., kidney toxins)
- | Neurotoxins (i.e., nerve toxins)
- | Chemicals that damage the ability to form blood cells
- | Chemicals that damage lungs, skin, eyes, **or** mucous membranes

How to Detect Hazardous Chemicals Releases

***I List ways in which
employees
can detect hazardous
chemical releases***

for example:

I Observation

I Smell

I Alarm

Personal Protective Equipment

(PPE)

I List ways in which concessioner employees should and/or can protect themselves from hazardous chemical exposure.

For example;

I Gloves

I Goggles

I Dust masks

I Respirators (may need to be included in Respiratory Protection Program —29 CFR 191.1034)

I Pants

I Long-sleeved shirts

Labeling System

I Labels must be on all containers holding hazardous chemicals.

I Labels must be created for hazardous chemicals that are not in their original containers. These

labels should be:

I Legible

I In English (Can supplement with other languages, if needed

I Easily readable.

I Label information should include:

I The chemical name

I Hazard information (e harmful if swallowed).

Note: Labels are not required on portable containers if the hazardous chemical is only for the immediate use of the employee who transfers the hazardous chemical to the portable container.

Material Safety Data Sheets (MSDSs)

- I Must be obtained for all hazardous chemicals in the workplace before they are used.**
 - I Provided by chemical manufacturer or distributor.**
 - I Provide detailed information on each hazardous chemical, including:
 - I Potential hazardous effects**
 - I Physical and chemical characteristics**
 - I Recommendations for appropriate protective measures.****
 - I Are readily accessible to employees in workareas during work shifts.**
- I List and/or identify areas where MSDSs are kept***

List of Hazardous Chemicals

I List of all hazardous chemicals used onsite is available to all employees.

I *Explain and show employees where to find the comprehensive hazardous chemical list (e.g., HAZCOM files in administrative office).*