

Hazard Communication Program

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15.1 PURPOSE

To set forth guidelines and procedures to protect the safety and health of Employees who are exposed to hazardous chemicals and substances in the workplace, and to comply with the mandatory provisions of the Hazard Communication Standard.

15.2 PROGRAM ADMINISTRATION

15.2.1 The main hazard communication program administrator will be Safety /HR or designated personnel. Site based administrator will be the site superintendent or SSHO as determined by the project. These supervisors will be held accountable for adherence to policies and will closely monitor all work activities involving exposure to hazardous chemicals/substances.

Each employee will carefully follow established work practices and promptly observe or report potential problems.

No task is so vital or urgent to justify the risk of employee overexposure to hazards. If in doubt, don't proceed.

15.3 HAZARDOUS DETERMINATION AND DISCLOSURE

15.3.1 In determining substances or mixtures are hazardous, several factors must be examined: how does the substance enter the body, physical form of the substance, amount of substance that actually enters the body, degree/level of toxicity of the substance. This procedure covers exposures designated as hazardous by one of the following: the manufacturer; by the Safety Data Sheet; or if they are listed on the "Safety List" of hazardous materials, or similar Government List.

- 15.3.2** Manufacturers and suppliers are required to provide health and safety information to their customers about hazardous chemicals. This is done through the use of Safety Data Sheets (SDS) and container labeling, which must be provided to the purchaser prior to, or at the time of shipment/delivery.
- 15.3.3** The company is mandated by law to maintain copies of the required SDS for each hazardous substance or mixture in the workplace and to ensure that these are readily accessible to employees when they are in their work area(s). SDS will be on file in on the following locations of which employees will be apprised: site office, connex company vehicle, company facility. A current list should be updated and maintained at each work site.
- 15.3.4** At each site, a comprehensive SDS Notebook will be comprised and used in monitoring inventory of hazardous substances and mixtures. Current lists and SDS Notebooks will be reviewed periodically by the program administrator or designated safety representative. If TAW is the controlling contractors, subcontractors will comply with federal regulations and provide TAW copies of site SDS. If TAW is a subcontractor, TAW will present the general contractor , owner's representative, or host employer.
- 15.3.5** SDS are to be requested from distributors/suppliers, and all purchases of any item containing a "Hazardous Chemical" must include the SDS with the delivery or other feasible means of delivering the required document. Alternative means of obtaining SDS include using TAW's vendor's websites or other electronic means. Assistance can be provided by contacting our Construction Administrator.
- 15.3.6** Any hazardous chemical received without the SDS should not be utilized until a follow-up request has been sent or an alternative means has provided a SDS received.
- 15.3.7** Only "authorized" employees (authorized by the managers, field supervisors or program administrator) will have the authority to make purchases that involve "hazardous substances or mixtures". All "authorized" company employees who purchase these will ensure vendors and suppliers are notified of the SDS requirement.
- 15.3.8** It is the responsibility of each site administrator where hazardous substances or mixtures are stored or utilized to ensure that SDS's are maintained appropriately and easily available to employees. Lists should be maintained and updated as necessary. Upon arrival of new chemicals, the list should be updated and employees should be made aware of the new chemical during a daily 5X3 Safety Huddle
- 15.3.9** The program administrator will rely on the manufacturer's determination of hazards associated with their chemicals as stated in the information provided on

their published container labels and SDS and the designated government lists of hazardous chemicals.

15.4 LABELS AND OTHER FORMS OF WARNING

- 15.4.1** Each product which contains hazardous chemicals must be properly labeled, tagged, or clearly marked with:
- 1) The identity of hazardous chemical
 - 2) Appropriate hazard warnings
 - 3) Manufacturer's name
 - 4) Other designated information per current guidelines or new GHS guidelines
- 15.4.2** Existing labels on incoming containers must not be removed or defaced unless the container is immediately marked with the information required above.
- 15.4.3** If existing labels on containers received from suppliers already convey the required information, new labels do not need to be affixed.
- 15.4.4** Hazardous substances or mixtures that are transferred to containers which are intended **only** for "immediate use" need not be labeled providing that such containers, upon completion of the transfer and use, are emptied and devoid of any hazardous residue.
- 15.4.5** Large containers or other stationary process containers may be labeled with signs, or other appropriate written information as long as the container to which the information applies is identified.
- 15.4.6** Chemicals that do not have the proper label and/or cannot be identified will not be used, handled, or stored. In such instances, the program administrator must be notified immediately. The chemical must then be identified and properly labeled or removed from the site under the direction of site administrator.

15.5 EMPLOYEE INFORMATION AND TRAINING

- 15.5.1** At each work site, fabrication facility, department, or area where hazardous chemicals are utilized or stored, employees must be provided with documented training on:
- a. How to handle hazardous chemicals safely and the use of personal protective equipment.
 - b. Where to find and how to use Safety Data Sheets and the hazardous chemical labeling system.

- c. Potential physical and health hazards associated with the use of hazardous chemicals or mixtures.
- d. Methods and observations used to detect the presence or release of hazardous chemicals in the workplace.
- e. First aid and emergency procedures to be utilized in the case of spills or accidental overexposure.
- f. General safety precautions necessary to prevent or minimize exposure to hazardous chemicals.

15.5.2 Throughout each site, employees will be informed whenever any temporary activity involves the use of hazardous chemicals. In such cases, employees will be informed of the nature of the activity and advised of any necessary precautions or potential hazards to be avoided.

Employees will be advised of the location and availability of the company's written Hazard Communication and Control Program and it will be communicated appropriately.

15.5.3 Employees will be advised:

- a. Of the right of the employee and/or the employee's physician or authorized representative to receive information regarding hazardous chemicals to which the employee may be exposed.
- b. That the employee is protected against any form of discrimination due to the employee's exercise of the rights.

15.6 HAZARDOUS NON-ROUTINE TASKS

Infrequently, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, each employee involved will be given information by the superintendent about hazards to which they may be exposed during such an activity. This information will include:

- 1) The specific hazards of the substance or mixture.
- 2) Protective/safety measures which must be utilized.
- 3) The measures the company has taken to lessen the hazards, including ventilation, respirators, air sampling readings, and emergency provisions.

15.7 OTHER EMPLOYERS

- 15.7.1** Whenever other employers, vendors, suppliers, or emergency responders enter or work at a location where hazardous substances or mixtures are stored or utilized, the supervisor must inform them that their employees may encounter hazardous chemicals while performing their work, and provide them with access to Safety Data Sheets (SDS). When other employers are working at T.A. Woods Company locations, this information will be provided to those workers. When TAW personnel are working at field locations, the project, trade supervisor, or SSHO shall coordinate the dissemination of chemical hazard information between TAW and other employers. TAW field personnel will be informed of these project-specific procedures.
- 15.7.2** Further, a site map may be prepared to identify the location of areas where hazardous chemicals are stored or in use. The site map will be made available to emergency responders and will be provided upon request, or at the program administrator's discretion, to employees of outside contractors, vendors, or supplier

15.8 STORAGE OF HAZARDOUS CHEMICALS

- 15.8.1** To the maximum extent possible, all poisons, acids, and flammable materials will be stored separately from all other materials, preferably in designated storage areas or cabinets per labels and SDS.
- 15.8.2** The program administrator will schedule periodic inspections to ensure that all hazardous chemicals on the site are appropriately labeled and stored.
- 15.8.3** Substances and mixtures used in maintenance, and which are incompatible (e.g. reactivity) should be minimized. To the maximum extent possible these should be separated into organic and inorganic groupings and further sorted into compatible families within those two major groupings.

15.9 ADDITIONAL EXPOSURE HAZARDS including ASBESTOS, LEAD or SILICA See Chapter 23

- 15.9.1** Specifications will be reviewed prior to estimating and/or starting a project. If information is not presented in the original documents or addendum, an RFI or similar will be generated. T.A. Woods Company will not proceed until written directives are provided by the host employer or controlling contractor. If the project is started with the written documents supporting the absence of exposure, and building conditions such as age, signage, or other indicate the possible presence, all work will stop until written confirmation from the controlling

contractor or owner or written test results indicate a safe work space or state hazards in order for appropriate controls to be instituted.

- 15.9.2** Administrative controls, engineering controls, work practices and/or PPE will be used to limit exposure to inhalation, absorption, and ingestion hazards which could cause acute or chronic health hazards.

Silica controls will be implemented in settings where there is a potential of exposure, air quality testing shows exposure, or tasks associated with Table 1 are being performed. Controls include using a wetting method prior to cutting, drilling or other work tasks which create a potential hazard. If engineering controls or administrative controls are not sufficient, respiratory protection measures will be utilized.

- 15.9.3** All employees are expected to practice effective personal hygiene including hand washing/sanitizing prior to meals and the end of the workday. If required, employees will shower at the end of the work shift, disposable protective clothing will be bagged and disposed of properly, respirators will be cleaned, washed and stored.

- 15.9.4** Employees of TAW are expected to report to the site supervisor or other designated personnel, contractors who are creating ACM, LCM, or silica exposure hazards. TAW employees are prohibited from working in areas of exposure or areas of possible exposure until documentation supports the absence of hazards or controls are in place to protect TAW employees from known hazards.