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Applicable OSHA Standard: 29 CFR 1910.1200, 1926.59

1. Purpose & Scope

- 1.1 The purpose of this program is to ensure that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to Cleveland Integrity Services Inc. and its employees.
- 1.2 This program applies to any chemical which is known to be present in any Cleveland Integrity Services Inc. workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

2. General Requirements

- 2.1 The following written Hazard Communication Program is to be implemented for employees of Cleveland Integrity Services Inc. Information about this program, any hazardous chemicals at their work location and training about the program will be provided to employees prior to work assignment.
- 2.2 The Company's Safety Representative will be responsible for ensuring the program is current and enforced. The Site Supervisor is responsible for ensuring that the program is effectively implemented at the supervisor's work location.
- 2.3 A copy of this program will be made available to an employee(s) upon hiring. Copies may also be obtained on written request from an employee or a designated representative. Requested copies will be provided in a timely manner. This program will also be available to the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee, and the Director, National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designee.
- 2.4 The program will be updated when new chemicals or hazards are introduced into the working environment; new processes or work assignments require changes or updating; and at least annually.
- 2.5 Material Safety Data Sheets will be required at the time that any chemical product for use in the Company workplace is purchased and obtained upon receipt of the chemical product.
- 2.6 Specific operations in the Company workplace where hazardous chemicals are used include:
 - 2.6.1 Vehicle, tools and equipment operations requiring use of fuels and lubricants
 - 2.6.2 Surface preparation, painting and coating operations requiring the use of abrasive blasting chemical products, paints, solvents and other necessary

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chemical products welding and hot work where welding rods, solders and other chemical products are required for welding and hot work processes

- 2.7 A Right To Know Station will be established at each Company work location. The station will be prominently displayed at a place where all employees in the area will have immediate and ready access to station contents for information and in case of emergency.

A copy of the Company's written Hazard Communication Program, a Chemical Inventory List of all chemicals authorized by the Company for use at the work location, and current copies of the Material Safety Sheet (MSDS) for each chemical product listed in the Chemical Inventory will be maintained at the station.

A master Right To Know Station will also be maintained at the corporate office and shop facility to employees, their designated representatives, the Assistant Secretary & the Director in accordance with the requirements of 29 CFR 1910.1020(e).

- 2.8 When employees are working at a remote job site or must travel between work locations, a copy of this program, written Chemical Inventory List and Material Safety Data Sheets of chemicals authorized for the work location will be sent with employees. Hazard communication information will be readily available to employees at the work location. The Site Supervisor will be contacted when a copy of the program is needed.

- 2.9 Supervisors and other Company employees at a work location will be constantly aware of signs and indications of a potential spill or some other accidental release of chemical product in the workplace.

Generally, chemical spills and release are noticed visually by observation or because an odor suspected to be from a chemical is noticed. Any such suspicion will be reported to the Site Supervisor immediately so that emergency response, containment and proper clean-up can be accomplished.

Industrial hygiene monitoring and monitoring devices operated by qualified personnel will also be used as required to detect the presence of chemicals, fumes and vapors.

- 2.10 Supervisors and employees will be aware of the physical and health hazards of chemicals present in the work location through review of MSDS.
- 2.11 MSDS and container labeling will be the primary reference information about: preventing exposures; safe work practices; proper selection and use of PPE for working with a chemical product; safe storage of chemical products; properties of the chemical product; emergency and containment/clean-up procedures in the event of a spill or release; and other types of information that is contained in an MSDS.

3. Container Labeling

- 3.1 The Site Supervisor will be responsible for all containers of hazardous chemicals entering the workplace and will assure that the chemical containers are properly labeled with:

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- 3.1.1 Chemical name, including product name and identity of the chemical;
- 3.1.2 Hazard warnings about the chemical;
- 3.1.3 Name and address of the manufacturer, importer, or responsible party; and
- 3.1.4 HMIS® labels properly marked (see sample tag at right)



- 3.2 Chemical containers other than the original product container will be checked and approved by the Site Supervisor or a competent person and the MSDS reviewed to ensure the safety of the alternate container. The Site Supervisor will ensure that the new container is properly labeled; i.e., that all secondary containers are labeled with an extra copy of the original manufacturer's label or with generic labels which have a block for identity and blocks for the hazard warning. For help with labeling, employees will contact the Site Supervisor and, if additional assistance is required, the Company's Safety Coordinator. The Safety Coordinator will review the labeling system annually as part of the annual review of this Hazard Communication Program and update as required.
- 3.3 The Site Supervisor will ensure that the contents of piping, gas and transmission lines are properly identified. The Site Supervisor will also inform employees of the hazards associated with chemicals contained in piping within the work areas.
- 3.4 Company employees will not remove or deface chemical product labeling.
- 3.5 Chemical product labeling will be in English. At the same time, if employees on the work location do not speak English as their primary language, the information provided in labeling will be provided to these employees in their primary language.

4. **Material Safety Data Sheets (MSDS)**

- 4.1 The corporate office or Site Supervisor, whichever is in charge of purchasing a chemical product, will be responsible for obtaining an MSDS for each product. The Site Supervisor will maintain the MSDS system at the work location.

The Site Supervisor will review incoming data sheets for new and significant health/safety information and will ensure that the new information is given to the affected employees. Copies of all MSDS will be kept by the Site Supervisor with copies displayed at the Right To Know Station at the location. The Site Supervisor and Safety Representative will review each MSDS annually for accuracy and completeness.

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4.2 The MSDS system will include:

- 4.2.1 Current master Chemical Inventory List of all MSDS, indexed alphabetically and by vendor;
- 4.2.2 The identity used on the MSDS will be the same as used on the container label;
- 4.2.3 The chemical and common name of all ingredients determined to present a hazard will appear on all MSDS;
- 4.2.4 The MSDS will list:
 - 4.2.4.1 The physical and chemical characteristics of the chemical including vapor pressure, flash point, etc.;
 - 4.2.4.2 The fire, explosion, and reactivity hazard(s) of the chemical mixture including the boiling point, flash point and auto ignition temperature;
 - 4.2.4.3 Health hazards of the chemical mixture including signs and symptoms of exposure and medical conditions recognized as aggravated by exposure with primary route(s) of entry;
 - 4.2.4.4 Permissible exposure limit (PEL) or any other exposure limit used or recommended by the manufacturer, importer, or employer;
 - 4.2.4.5 Whether on carcinogen listing (NTP) or has been found to be a potential carcinogen (IARC listing) or by OSHA (see Appendix A immediately following this program);
 - 4.2.4.6 Control measures including fire, engineering, personal protective equipment;
 - 4.2.4.7 General precautions for safe handling and use including protective measures during repair and maintenance and procedures for clean-up of spills and leaks;
 - 4.2.4.8 Emergency and first aid procedures;
 - 4.2.4.9 Date prepared or changed;
 - 4.2.4.10 Name, address, telephone numbers of manufacturer, importer, or responsible party to call in an emergency.

4.3 The MSDS will be available for use by employees. Each Site Supervisor will keep a current copy of the program on file and in the location's Right To Know Station. New chemicals will not be used until a MSDS has been obtained and reviewed for health hazards by the Site Supervisor.

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5. Employee Training & Education

- 5.1 Before starting work, the respective Site Supervisor will go over with the new employee the hazard communication program and site-specific work plan, as well as each MSDS applicable to their job. This orientation may be supported with handouts, video tapes, etc. Before any new chemical is used, all effected employees will be informed of its use, will be instructed on safe use, and will be trained on hazards associated with the new chemical. All employees will attend additional training, as appropriate, to review the program and MSDS. Appropriate reference material will also be discussed during the training session(s).
- 5.2 The minimum orientation and training for a new employee is as follows:
 - 5.2.1 An overview of the requirements contained in the Hazard Communication standard, 29 CFR 1926.59;
 - 5.2.2 Chemicals present in their workplace operations;
 - 5.2.3 Location and availability of the written program;
 - 5.2.4 Location of MSDS file and location of hazardous chemicals inventory list.
 - 5.2.5 Physical and health effects of the hazardous chemicals listed on the inventory list of this program;
 - 5.2.6 Accepted work practices, required PPE, spill and leak procedures, emergency procedures and other protective measures to be used for the chemicals authorized for the workplace;
 - 5.2.7 Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
 - 5.2.8 How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment;
 - 5.2.9 Steps taken by the Company to lessen or prevent exposure to the chemicals listed on the inventory list; and
 - 5.2.10 Emergency procedures to follow if exposed to a chemical.
- 5.3 Prior to a new chemical being introduced into any section of the workplace, each affected employee will be given information and training as outlined above by the Site Supervisor. MSDS will be available prior to use.
- 5.4 After attending the training class, each employee will sign a form to verify that he or she attended the training, that the written plan is made available for review, and that the employee understands the plan.

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- 5.5 Before entering a job site, the Site Supervisor will ascertain what chemical hazards employees may be exposed to and then take appropriate action to protect the employees. If an employee has any question about what protection is needed, he or she should contact the Site Supervisor or site Safety Representative immediately.

6. Non-Routine Tasks

- 6.1 Before any non-routine task is performed, employees will contact the Site Supervisor for special precautions to follow as required. Also, the supervisor will inform any other personnel who could be exposed. Non-routine task situations include unlabeled pipes, gas and transmission lines at the work location.
- 6.2 In the event that a non-routine task is expected to present a chemical exposure, the Site Supervisor will provide the following information as it relates to the task and the specific chemicals that may be encountered:
- 6.2.1 Specific chemical name(s) and hazard(s);
 - 6.2.2 Protective equipment required and safety measures to be taken;
 - 6.2.3 Measures that have been taken to lessen the hazards (i.e. ventilation);
 - 6.2.4 Presence of other personnel in the area; and
 - 6.2.5 Emergency response procedures.

7. Multi-Employer Workplaces

- 7.1 If Company employees at the work location produce, use or store hazardous chemicals in such a way that the personnel of another employer may be exposed (i.e. other contractors working on-site) the Site Superintendent will ensure that job-site hazard communication compliance includes the following:
- 7.1.1 Methods for providing personnel of other employers with on-site access to MSDS for each hazardous chemical that they may be exposed to while working;
 - 7.1.2 Methods used to inform personnel of other employers about any precautionary measures that need to be taken to protect themselves during normal workplace operations, as well as in the event of foreseeable emergencies; and,
 - 7.1.3 Methods used to inform personnel of other employers about the labeling system used in the workplace.

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8. Obtaining MSDS from Other Contractors

- 8.1 The Site Supervisor or Safety Representative will contact any other contractor working at a job site for information about chemicals they bring to the work location that may affect Company employees. MSDS will be obtained from the other contractor, as required, before Company employees begin work.

APPENDIX A

The following chemicals are regulated by OSHA as carcinogens in substance-specific standards that include labeling requirements.

- Asbestos
- 4-Nitrobyphenyl
- Alpha-Naphthylamine
- Methyl Chloromethyl Ether
- 3,3 Dichlorobenzidine (and its salts)
- Bis-Chloromethyl Ether
- Beta-Naphthylamine
- Benzidine
- 4-Aminodiphenyl
- Ethyleneimine
- Beta-Propiolactone
- 2-Acetylaminofluorene
- 4-Dimethylaminoazobenzene
- N-Nitrosodimethylamine
- Vinyl Chloride (and poly-vinyl Chloride)
- Inorganic Arsenic
- 1,2 Dibromo-3-Chloropropane
- Acrylonitrile
- Ethylene Oxide
- Formaldehyde
- Benzene