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1.0 Purpose

This program has been established to safeguard the health and safety of all Branscome employees by ensuring that chemical hazards in the workplace are evaluated and that information about preventions and controls are transmitted to employees.

2.0 Scope

Branscome's Hazard Communication Program applies to all employees and contractors who may come in contact with chemicals within our facility.

We strive to:

- Develop reasonable precautions to provide an environment that is free from uncontrolled recognized hazards;
- Ensure that chemical hazards are identified within the worksite; and
- Make available chemical hazard information and training to all workers who may be potentially exposed.

Rely on SDS information provided by chemical manufacturers in determining chemical controls.

3.0 Roles & Responsibilities

3.1 Management - Branscome is required to develop, implement, maintain and enforce the Hazard Communication Program (HCP). Management will ensure that the resources are available to manage these chemicals.

3.2 Plant Superintendent shall -

- Help implement, maintain and enforce the HCP;
- Monitor Hazard Communication Program activities to ensure that they are being properly implemented and procedures are being followed after implementation; and
- Periodically audit the program to ensure continued effectiveness.

3.3 The Director of Safety shall maintain the HCP, including:

- Review the Plan at least annually and make necessary changes;



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- Provide technical assistance in the selection of personal protective equipment (PPE);
 - Ensure that proper training materials are available to support the training of all employees;
- 3.4 The Safety Specialist will assist the Plant Superintendent with the day-to-day operation of the HCP and will:
- Provide employees with training regarding hazards or practices specific to their work area at the time of their assignment and whenever a new hazard is introduced into the work area;
 - Review all new data sheets to determine adequacy;
 - Maintain a master list of chemicals used at the site;
 - Maintain a master copy of the SDS for each chemical used at the site;
 - Ensure all chemicals received are accompanied by a SDS;
 - Maintain an employee-access binder containing a copy of the HCP, chemical list and SDS for chemicals on site;
 - Produce copies of SDSs and of the Hazard Communication Program upon request by any employee or regulatory agency;
 - Informing outside contractors of chemical (or other) hazards that may be encountered while working at Branscome;
 - Inform contractors of the location of the SDS; and
 - Inform employees regarding proper performance of non-routine tasks with chemicals.
- 3.5 Supervisors will maintain an employee-access HCP/SDS binder as well as:
- Ensuring that all hazardous chemicals/products are properly labeled and that these labels are not removed or defaced.
 - Informing employees of any operations in their work area where hazardous chemicals are present
 - Ensuring that proper PPE is provided to employees.
 - Ensuring that employees are trained in the use of PPE and that PPE is properly maintained.
 - Developing safe work procedures for all operations under their supervision.



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- Ensuring the proper performance of non-routine tasks.

3.6 Employees are responsible for the safe handling of their chemicals, including:

- Maintaining their work area in good order;
- Properly using, maintaining, and storing PPE issued ;
- Reporting any exposures, injuries, or safety problems to their supervisor;
- Reviewing SDS prior to using a chemical for the first time then reviewing periodically thereafter as necessary;
- Attending required hazard communication training; and
- Reviewing the use of chemicals before engaging in any non-routine task.

4.0 Definitions

4.1 Exempted Materials -

- Hazardous waste;
- Tobacco and tobacco products;
- Wood or wood products, foods, drugs or cosmetics designed for personal consumption, consumer products or hazardous substances that are used in the same manner as normal consumer use and result in a duration and frequency of exposure that is not greater than those experienced by consumers; and
- Articles or manufactured items that do not release or result in employee exposure to hazardous chemicals under normal conditions

4.2 Hazardous Chemicals - any chemical that is a physical hazard or a health hazard.

4.3 Health Hazards - Includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, kidney, liver, and nerve toxins, agents which act on the blood system and agents which damage the lungs, skin, eyes, or mucous membranes.

4.4 SDS - Safety Data Sheets provide manufacturer's information concerning a hazardous chemical and include safety information for users and emergency responders.

4.5 Non-Routine Task - Job tasks that are unusual in nature and may utilize chemicals familiar to employees, but under significantly different working conditions.



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- 4.6 Physical Hazards - Chemicals for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, burns in contact with air, unstable (reactive) or water reactive.

5.0 References

- 5.1 29 CFR 1910.1200 – Hazard Communication
- 5.2 29 CFR 1910.1020 – Access to Employee Exposure and Medical Records
- 5.3 OSHA CPL 2.2.38D – Inspection Procedures for the Hazard Communication Standard, 1998

6.0 Program

6.1 Chemical Inventory

- 6.1.1 A detailed and complete inventory of hazardous chemicals known to be present in the facility must be maintained and readily available for employee reference.

This list should be updated annually. Chemical Inventory List must be maintained by hard copy and may be computerized for convenience.

6.1.2 Cross Referencing

The chemical name on the chemical inventory should correspond to the product identity found on the label and the SDS. With this list management, supervisors, and employees can:

- Determine if SDS are available for all hazardous chemicals
- Determine if employees have been informed of the hazards in their work area
- Determine the proper means of employee protection.

6.1.3 Location

One or more HCP/SDS books will be available in the facility. If necessary, a notice to employees can be posted describing where this information can be found.

6.2 Safety Data Sheets

- 6.2.1 The Safety Data Sheet (SDS) is a fact sheet for chemicals which pose a physical or health hazard in the workplace. The Hazard Communication Standard requires



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manufacturers and distributors to provide SDS with the chemicals they produce or ship (initial shipment and with the first shipment after an SDS is updated).

- 6.2.2 The Plant Superintendent shall receive with shipment, a SDS from the chemical manufacturer or supplier for each hazardous chemical used. These sheets will contain, as well as can be determined, all information required by the Hazard Communication Standard.

Branscome relies on the SDSs for the information necessary to evaluate the hazards of the materials used in our operations.

- 6.2.3 Each new SDS received will be reviewed by the Safety Specialist to determine adequacy. The SDS must have:

- The identity of the material
- Physical and chemical characteristics
- Physical hazards
- Health hazards
- Primary routes of entry and symptoms of exposure
- OSHA, ACGIH or other available exposure limits
- Whether it is a listed carcinogen
- Precautions for safe handling and use
- Engineering and work practice controls
- PPE use
- Emergency and first aid procedures
- Date of preparation or last change to the SDS
- Name, address and phone number of the chemical manufacturer, supplier or importer.

6.2.3.1 If an SDS is not received at the time of the first shipment or the SDS is deemed inadequate, the Plant Superintendent will send a first request letter. If the initial request is not satisfied within 30 days, a second request letter will be sent. Beyond this request, the chemical and distributor should not be used.

6.2.3.2 If materials are purchased directly from a local retail store, the purchaser must obtain an SDS and ensure that the sheet gets into the SDS system. For example, chemicals may be purchased at a hardware store or discount store. At these locations an SDS must be requested when items are purchased.



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6.2.4 SDSs will be made available to employees or designated representatives of employees, if requested in writing. The SDSs are also to be made available to the Assistant Secretary of Labor of OSHA or the Director of NIOSH when requested.

6.3 Labeling

6.3.1 Container Labels

Branscome is responsible for making certain that chemicals arrive with the required hazardous information on the containers. Because Branscome is an end-user of chemicals, it is appropriate to use the labels provided by the manufacturer and no special labeling program will be implemented.

6.3.2 Bulk Chemicals

SDS for bulk delivery chemicals will also be obtained and maintained.

6.3.4 Information Required

All containers of hazardous chemicals received from a manufacturer or distributor must be labeled or marked with:

- The chemical's identity
- The name and address of the manufacturer
- Appropriate hazard warnings

6.3.5 Labels must be in English and legible. Employees should read the label before a container is opened, moved, or handled.

6.3.6 A container or containers whose label is missing, illegible or has inadequate information should be reported immediately to the Supervisor. No one should handle a container when its contents are unknown.

6.3.7 Never remove or deface a manufacturer's label from a container unless the container is immediately marked with the required information or unless the container is empty.

6.3.8 When transferring materials from a larger container to a smaller one, labels which provide the means to identify the chemical must be provided. All containers other than single-use containers must be labeled. The information must include the name of the chemical, the appropriate hazard warning, and the contact information for the manufacturer. This information is transferred from the source label or from the SDS.

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6.3.9 The Global Harmonization Systems labeling system shall be used in labeling all containers.



7.0 Training

- 7.1 Employees are trained at the time that they enter into a job classification which requires the use of chemicals. Additional training is required each time a new chemical hazard is added to the work.
- 7.2 Classroom training will be provided by the Safety Specialist or his designee at the time of initial employment in a job classification where chemicals are used. Training documentations shall be maintained by the Safety Specialist.
- 7.3 During initial training, employees must be informed of the following:
- The requirements of the Hazard Communication standard;
 - Any operations in their work area where hazardous chemicals are present
 - The location and availability of the Branscome Hazard Communication Program
 - The physical and health hazards of the chemicals



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- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area and the physical and health hazards of chemicals in the work area
- The measures employees can take to protect themselves from hazards, including specific procedures such as engineering controls, appropriate work practices, emergency procedures, and personal protective equipment to be used
- The details of the Branscome Hazard Communication Program, including labeling systems, Safety Data Sheets, and how employees can obtain and use the appropriate hazard information

Training shall be maintained in the employee's department training file.

7.4 The following information must also be transmitted to employees:

- The hazards of **non-routine tasks** such as entering confined spaces or working with rarely used chemicals.
- The hazards associated with chemicals in **unlabeled pipes** in the work area. Maintenance or other facility departments should be able to identify the pipes in work areas and communicate any hazards are associated with them.

7.5 Introduction of New Chemicals

If new materials that have not been used before are brought into the work area employees must be informed of the following:

- The physical and health hazards of the material;
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area and the physical and health hazards of chemicals in the work area; and
- The measures employees can take to protect themselves from hazards, including specific procedures such as engineering controls, appropriate work practices, emergency procedures, and personal protective equipment to be used.

7.6 Non-Routine Tasks

These are tasks that involve the use of hazardous materials that are not normally used at Branscome or the use of hazardous materials in an unusual fashion. Prior to each task Branscome commences that is non-routine, the Supervisor will have a safety meeting with all employees to discuss the safe completion of the task. Safety information, personal protective equipment, and other necessary precautions they may need to take must be reviewed. If the non-routine task is discovered during the course of the work, the Supervisor will have a safety meeting at that time.



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7.7 The Branscome Safety Specialist must provide a copy of our HCP to contractors and their employees who could be exposed to hazardous chemicals on Branscome's property. SDSs will be made available to contractor personnel, and all chemicals which they may contact must be labeled.

8.0 Document History

Number	Effective Date	Reason	Author
Original	May, 2006		
Revision 1	January, 2012	Revisions	Alvin Trotman
Revision 2	March, 2013	Correct misc. typo's	Alvin Trotman
Revision 3	October 1, 2013	Global Harmonization	Alvin Trotman
Reviewed	December, 2014	Review – No Changes	Alvin Trotman