

Safety Policy & Procedure Manual		Section:	Date: 10-29-2015
		Revision:	
Subject: <h2 style="text-align: center;">Hazard Communication Program</h2>			

PURPOSE

The following Hazard Communication Program has been established by Light Tower Rentals for the protection of all personnel. Any chemical which is known to be present at any branch facility in such a manner where personnel may be exposed under normal conditions of use or in a foreseeable emergency are included within the scope of this program.

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) requires the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012. The written hazard communication program will include and address the following criteria in order to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area
- Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
- Methods used to obtain and maintain safety data sheets (SDSs)
- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of non-routine work practices
- Methods used to provide the employees of other employers (e.g., consultants, construction contractors and temporary employees) on-site access to SDSs for each hazardous chemical that the other employer's employees may be exposed to while working in the workplace
- Methods used to inform the employees of other employers of precautionary measures that need to be taken to protect themselves during the workplace's normal operating conditions and in foreseeable emergencies
- Methods used to inform the employees of other employers of the labeling system used in the workplace

The hazard communication program will identify the following:

- Key personnel responsible for the program
- Location of chemical inventory list and SDSs
- Workplace labeling system
- Good work practices and procedures to minimize exposures
- How training will be performed
- Procedures to maintain the program and update the required information

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DEFINITIONS

- **Chemical** - means any element, chemical compound or mixture of elements and/or compounds.
- **Chemical manufacturer** - means an employer with a workplace where chemical(s) are produced for use or distribution.
- **Chemical name** - means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.
- **Common name** - means any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.
- **Container** - means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
- **Distributor** - means a business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.
- **Employee** - means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.
- **Employer** - means a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.
- **Exposure or exposed** - means that an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)
- **Foreseeable emergency** - means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.
- **Hazardous chemical** - means any chemical which is a physical hazard or a health hazard.
- **Hazard warning** - means any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s).
- **Health hazard** - means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.
- **Immediate use** - means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- **Importer** - means the first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.

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- **Label** - means any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.
- **Mixture** - means any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.
- **Physical hazard** - means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.
- **Pictogram** – means a composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical.
- **Precautionary statement** – means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.
- **Produce** - means to manufacture, process, formulate, blend, extract, generate, emit, or repackage.
- **Responsible party** - means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.
- **Safety data sheets (SDS)** – means written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph 1910.1200 (g).
- **Signal word** – means a word that is used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label.
- **Use** - means to package, handle, react, emit, extract, generate as a byproduct, or transfer.
- **Work area** - means a room or defined space in a workplace where hazardous chemical are produced or used, and where employees are present.
- **Workplace** - means an establishment, job site, or project, at one geographical location containing one or more work areas.

RESPONSIBILITY

The Branch Manager/Safety Officer will be responsible for implementing and maintaining the Hazard Communication Program for each branch location.

The Branch Manager/Safety Officer is responsible for:

- Maintaining a list of all hazardous chemicals known to be present at the job site.
- Ensuring all personnel receive Hazard Communication training. Personnel will be informed of the hazards in and around the job site and of any precautionary measures that will need to be taken to protect themselves during normal operating conditions and in foreseeable emergencies.
- Implementing safe handling procedures and, if necessary, specifying the appropriate personal protective equipment to be used to protect LTR personnel from the hazards associated with the use of chemicals.
- Informing personnel of the hazards of non-routine tasks (i.e. cleaning of tank, pits, etc.).

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- Communicating this program to LTR contractors. Reviewing SDSs for chemicals that contractors are planning to bring on site to ensure they can be handled safely.
- Maintaining a facility SDS Notebook or similar system for all chemicals brought on-site. Make certain that obsolete SDS, for chemicals no longer being used, are kept for 30 years after the last use of the material.
- Monitoring labeling at the facility and determining the identity of unknown materials.
- Reviewing with contractors the hazards in and around the facility and explaining the location of LTR Hazard Communication Program, and SDS Notebook or similar system.
- Notifying affected personnel and contractors of the physical and health hazards of any chemicals which personnel may be exposed to while working at this facility, including any chemicals brought on site by contractors. This will also include any precautionary measures that will need to be taken during normal operating conditions and in foreseeable emergencies.
- Ensuring that this program and the SDS Notebook or similar system readily accessible to all personnel, in their work area, throughout each work shift.

Employees are responsible for the following aspects of the hazard communication program:

- Identifying hazards before starting a job
- Reading container labels and SDSs
- Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers
- Using controls and/or personal protective equipment provided by the company to minimize exposure
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
- Participating in training

HAZARD IDENTIFICATION PROCESS

Chemical manufacturers and distributors are responsible for determining the hazards associated with their products. This information will be relayed to LTR personnel through the use of container labels and SDSs.

If new information is discovered about a substance the chemical manufacturers, importers, and distributors are required to update their SDS. This new hazard information will be transmitted to LTR personnel as it becomes available.

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CHEMICAL INVENTORY/SAFETY DATA SHEETS

Safety Data Sheets (SDS) are obtained and reviewed prior to the use of any chemical by LTR personnel or contractors at any LTR facility. Chemicals or products containing chemicals are not used at the facility until responsible personnel have evaluated them. SDSs are required for all chemicals (cleaners, solvents, paints, coatings, etc.), which are not articles or consumer products. Copies of the SDSs for chemicals currently used are maintained in a SDS Notebook or a similar system and will be readily accessible during each work shift to employees when they are in their work areas. Originals of the SDS are stored separately as backup copies.

SDSs will be obtained from the chemical manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. An SDS Inventory (Form 1027 or equivalent form) is maintained in the SDS Notebook, or computerized system, to identify chemicals for which SDSs have been collected. The Inventory is updated annually and whenever a new chemical is introduced in to the workplace in order to maintain an accurate list of SDSs that are in the SDS Notebook.

The Safety Department will maintain a master file of all original SDSs for each branch location. Hard copies of the master file will be located in the front office and shop at each branch location.

SDSs for new products or updated SDSs for existing products will be obtained by the Branch Manager/Safety Officer and forwarded to the Safety Department. The Safety Department will then update the master file with new and/or updated SDSs.

If problems arise in obtaining an SDS from the chemical manufacturer, importer or distributor, a phone call will be made to request an SDS and to verify that the SDS has been sent. The phone call will be logged and a letter will be sent the same day. The company will maintain a written record of all efforts to obtain SDSs. If these efforts fail to produce an SDS, the local OSHA office will be contacted for assistance.

LABELS AND OTHER FORMS OF WARNING

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

Light Tower Rentals will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

- Product identifier

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- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.

Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow. (Please note that this not a requirement of the OSHA HCS but a best practice or requirement of local jurisdiction.)

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

Note: After Dec. 1, 2015, distributors may not ship containers labeled by the chemical manufacturer or importer unless the label on the container meets GHS labeling requirements.

EMPLOYEE INFORMATION AND TRAINING

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry)
- Operations in the work area where hazardous chemicals are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released

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- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
- Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
- Explanation of the labels received on shipped containers
- Explanation of the workplace labeling system
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information

Retraining is required whenever one or more of the following conditions exist:

- There is a change in a person's work assignment, which presents a new physical or health hazard for which the person has not been trained.
- A new physical or health hazard is to be introduced, or an old hazard changes, at the facility for which personnel have not been previously trained.
- There are deviations from the Hazard Communication Program or inadequacies in a person's knowledge of the hazards associated with chemical usage.

Note: To facilitate understanding of the new GHS system, the OSHA HCS requires that employees be trained regarding the new label elements and SDS format by Dec. 1, 2013. Employers are required to update the hazard communication program and to provide any additional training for newly identified physical or health hazards no later than June 1, 2016.

NONROUTINE TASKS

The Branch Manager/Safety Officer of an employee performing a non-routine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed.

CONTRACTOR

Prior to beginning work, the Branch Manager/Safety Officer will inform contractors with employees working on company property of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. The Branch Manager/Safety Officer will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

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Furthermore, the Branch Manager/Safety Officer will advise contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

The Branch Manager/Safety Officer will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

PROGRAM ENFORCEMENT

The Branch Manager/Safety Officer is responsible for enforcement of the Hazard Communication Program. Anyone who directs someone to violate, or has knowledge of a violation, and takes no corrective action will receive appropriate disciplinary action.

All personnel are responsible for following the procedures in this program. Personnel found in violation of this program will be subject to disciplinary action.

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SDS Inventory – Form 1027

Product Name	Manufacturer Name	SDS Date	Type of Container	SDS Retired