



STREETER
ASSOCIATES

SHARP MINDS. SUPERIOR CONSTRUCTION.



HAZARD COMMUNICATION PROGRAM

TAB 2



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I.

Hazard Communication Management Plan



HAZARD COMMUNICATION MANAGEMENT PLAN

Policy

Employees are our organization's most important assets - their safety and health our greatest responsibility.

It is the policy of this organization that every employee is entitled to a safe and healthful place to work.

When employees enter our employ, they have a right to know what hazardous chemicals they work with or could be exposed to, and what they can do to avoid injury or illness when working with these chemicals. We will be providing information and training in order to reduce the possibility of accidental exposure and to comply with the OSHA Hazard Communication Standard.

Purpose

The Occupational Safety and Health Administration Hazard Communication Standard requires that all employers develop and implement a written hazard communication program. This program is designed to describe how the OSHA Hazard Communication Standard requirements are met in this organization.

OSHA's primary intent in issuing this standard is to ensure that employees will receive as much information as needed concerning the hazards in their workplace, and that this information will be presented to our employees either prior to starting work, when changing jobs, or when new hazards are introduced into their work area.

The purpose of this program is to ensure that:

- All employees are aware of our Hazard Communication Program and that it is available to all employees, designated representatives, and OSHA.
- All hazards of chemicals are evaluated.
- All hazardous chemicals used in the workplace are labeled, and that a list of chemicals is posted.
- That Safety Data Sheets are available for all hazardous chemicals.
- That employees receive information and training so that they are informed of the requirements of the standard and trained about hazards in their workplace.
- That all persons involved in non-routine tasks are informed of the hazards of such tasks.
- That exchange of information takes place with owners and subcontractors regarding hazardous chemicals.



II.

Hazard Communication Program



HAZARD COMMUNICATION PROGRAM

The Hazard Communication Compliance Plan for our organization is in written form and is kept at the location noted below. Employees, their designated representatives, and OSHA can read the program at any time during working hours.

Our Compliance Plan is located at:

101 E. Woodlawn Avenue, Elmira, New York 14901

Hazardous Chemical List (s)

A complete listing of all hazardous chemicals used by each project site will be available by calling 1800-451-8346 or 760-602-8703.

The Superintendent is responsible for keeping the 1800-451-8346 or 760-602-8703 posted and available. All purchase orders shall include a SDS be sent with the first delivery.

Safety Data Sheets (SDS)

Each project site will maintain and utilize our online SDS provider 3E, or call the 1800-451-8346 or 760-602-8703.

Employees are encouraged to review these Safety Data Sheets.

Copies of SDS's can be obtained by employees by request to the Superintendent or by contacting our online SDS provider **3E at 1-800-451-8346**. An explanation of the SDS will be given to the employee if requested.



III.

Labels and Other Forms of Warnings



LABELS AND OTHER FORMS OF WARNING

Streeter Associates, Inc. policy regarding labeling is that all materials shall be left in their original containers, unless it is absolutely necessary to transfer the materials.

General Requirements

Chemical manufacturers, importers and distributors are required to label all containers of hazardous chemicals. The labels, tags, or markings must include:

- Product Identification
- Supplier/Manufacturer Identification
- Precautionary Statements
- Symbols called “Hazard Pictograms”
- Signal Words
- Hazard Statements
- Supplementary Information

All hazardous material containers delivered to this workplace must have appropriate labels. If a container is not labeled, then the Hazard Communication Coordinator (HCC) or Supervisor should be notified and a request will be sent to the manufacturer for a proper label.

Labels on incoming containers of hazardous materials shall not be removed or defaced.



SAMPLE LABEL

PIWDUCT IDB TIFIER

CODE _____

Product ir ame

SUPPLIER IDB TIFICATION

Comp-any iHame _____

Street Address _____

City _____ **State** _____

Postal Code _____ **Gountry** _____

Emergency Phone Number _____

PRECAIJTIONARY STATEMEJITS

Keep oontainer tightly closed. Store in oool., well ventilated plaoe that is locked.

Keep away from heat/sparks/open flame. No smoking.

Only use non-sparking tools.

Use explrn,ion-proof electrical equipment. Take precautionary measure against static discharge.

Ground and bond oontainer and receiving equipment.

Do not breathe vapors.

Wear Protective gloves.

Do not eat, drink or smoke when using this product.

Wash hands thoroughly after handling.

Dispoae of in accordanc,eNith local, regional, national, international regulations as specified.

In Case of fire: use dry chemical (BC) or Carbon dioxide (CO₂) fire extinguisher to extinguish.

Fiirst Aid

If exposed call Poison Center.

If on skin (on hair): Take off immediately any oontaminated clothing. Rinse skin 1NithNater.

HAZARD PICTOGRAMS

SIGI' AL WORD

Danger

HAZARD STATEMETff

Highly flammable liquid and vap,or. May cause river and kidney damage.

SUPPLEMEENTAL IIFORMATION

Dir,ections for use

Fill weight: _____ **Lot Number** _____

Gross weight: _____ **Fill Date:** _____

Expiration Date: _____



GHS Pictograms and Hazard Classes

<ul style="list-style-type: none"> • Oxidizers 	<ul style="list-style-type: none"> • Flammables • Self-reactives • Pyrophorics • Self-heating • Emits flammable gas • Organic peroxides 	<ul style="list-style-type: none"> • Explosives (1.1-1.4) • Self-reactives • Organic peroxides
<ul style="list-style-type: none"> • Acute toxicity (severe) 	<ul style="list-style-type: none"> • Corrosive to metals • Skin corrosion • Serious eye damage 	<ul style="list-style-type: none"> • Gases under pressure
<ul style="list-style-type: none"> • Carcinogenicity • Respiratory sensitization • Toxic to reproduction • Specific target organ toxicity (repeated) • Germ cell mutagenicity • Aspiration hazard 	<ul style="list-style-type: none"> • Aquatic toxicity (acute) • Aquatic toxicity (chronic) 	<ul style="list-style-type: none"> • Acute toxicity (harmful) • Skin/eye irritation • Skin sensitization • Specific target organ toxicity (single) • Hazardous to the ozone layer



Solid Metal

Suppliers of solid metal materials which may emit hazardous substances when worked upon are required to supply labels with the first shipment of that material.

In-House Labeling System

Materials shall be left in their original containers whenever possible. If this is not possible, the following “In-House Labeling System” must be used.

The only exception to this is when a portable container is filled and used by a single employee on a single shift with no product transferred to another employee or another shift.

When materials are transferred from a labeled container to another container, the receiving container must be labeled. All labels developed in-house will derive their information from the labels of the incoming containers and the safety data sheets. All labels developed in-house are to be based upon the system indicated below. The following information will be provided on the in-house labels:

- Product Identification
- Supplier/Manufacturer Identification
- Precautionary Statements
- Symbols called “Hazard Pictograms”
- Signal Words
- Hazard Statements
- Supplementary Information

Labeling of Portable Containers

Portable containers into which hazardous chemicals have been transferred need not be labeled if that container is used immediately (within the one day and used by the employee who performed the transfer).

Stationary Containers

Signs and placards may be used on in-house stationary containers in lieu of labels as long as the labeling requirements are met. Operating procedures, process sheets, batch tickets, and other written materials can be used as substitutes for individual container labels on stationary process equipment. However, these written materials must contain the same information as required on the labels and must be readily accessible to the employees. Pipes and piping systems do not have to be labeled; however, hazard information must be available in the SDS files.



Training Requirements

All employees are to receive training on the in-house labeling system so that they can interpret and understand the labels and information provided. This training will be provided by the Hazard Communication Coordinator or Supervisors and all employees are required to attend.

Updating Labels

As we are not a manufacturing facility, labels will be updated as reflected on the manufacturers' labels and related SDS.

All portable containers will have a complete label. The only exceptions are portable containers filled and used by a single employee on a single shift with no product transferred to another employee or another shift.



IV.

Hazard Determination Procedure



HAZARD DETERMINATION PROCEDURE

Hazard Determination Policy

Chemical manufacturers and importers are required to evaluate the hazards of the chemicals which they manufacture. These health hazard determinations are to be based upon scientific evidence. The evidence must be statistically significant and must be based on at least one positive study conducted in accordance with established principles. This health hazard information will appear on the Safety Data Sheet. The Hazard Communication Standard requires that chemical manufacturers, importers, and distributors provide Safety Data Sheets with the next shipment of their hazardous chemicals by September 23, 1987.

Therefore, no hazard determination will be conducted by our organization.

It is our organization's policy to rely on the SDS received for information concerning the hazardous chemicals we work with.

If hazard determination is needed because we generate a chemical for which we have no SDS, it is our company's policy to contact our online SDS provider 3E at 1-800-451-8346.

Hazardous Chemical Exemptions

The following substances are exempt from the Hazard Communication Standard and, therefore, no hazard determination will be performed upon the following products:

- Hazardous Waste - subject to regulations issued by the Environmental Protection Agency.
- Tobacco or Tobacco Products.
- Wood or Wood Products.
- Articles which would not emit a hazardous substance if worked upon.
- Food, Drugs, Cosmetics, or Alcoholic beverages packaged for consumers.
- Food, Drugs, or Cosmetics for personal consumption.
- Consumer or hazardous substances used in the same manner, frequency, and duration as does a normal consumer. OSHA intends to read this exemption narrowly. The HCC OR SUPERVISOR or supervisor will therefore, determine if the frequency and duration of a chemical's use is comparable to that of consumer use. The HCC OR SUPERVISOR or supervisor will obtain a safety data sheet where it is determined that these products are used more frequently than would a normal consumer.
- Solid drugs such as tablets, capsules, and pills



V.

Employee Information and Training



EMPLOYEE INFORMATION AND TRAINING POLICY

A combination of training and written materials will be used for informing and training employees. Although it is not necessary to review every specific SDS with employees, they must be informed of the location of the written Hazard Communication Program and SDS's and how they can obtain a copy of an SDS. Most of all, they must be informed of the hazards of the chemicals they work with and how they can protect themselves from exposure.

Superintendents are responsible for making sure that employees are informed about the Hazard Communication Program and that SDS's are available to any employee on any workshift, that protective equipment is available and used, and that engineering controls, such as ventilation are in place and operating properly. SDS's can be obtain 24 hours a day, 7 days a week, 365 days a year by calling our online SDS provider **3E at 1-800-451-8346**.

Employees Requiring Training

The determination of which employees will be selected to receive Hazard Communication Training will be based upon their exposure. Those employees who have actual as well as potential exposure to hazardous chemicals will receive training. It is our intent to ensure that employees receive information about all chemicals in their work areas, and that they are prepared to deal with any unexpected releases or emergency situations, as well as, exposures during the normal course of employment. Certain personnel will be excluded from Hazard Communication training that are not exposed to hazardous chemicals.

The Hazard Communication Standard has special training provisions for personnel who handle sealed containers of hazardous chemicals, laboratory personnel, and for those personnel who may be exposed to hazardous chemicals from other employers. Special training requirements are in Special Exemptions and Provisions.

Training must be provided to all affected employees.

Employees must be trained on how to understand and use an SDS to obtain information about the chemicals they work with.



In-House Labeling of Chemical Containers

All containers of hazardous chemicals must be labeled by the chemical supplier. A standard in-house labeling system will be used at our jobsites for transfer of chemicals to portable containers. Specific instructions are in Section 3 Labels and Other Forms of Warnings. This system must be explained to the employees.

Elements of our Training Program

To help management to inform and train employees, the training program includes:

1. Requirements of the Hazard Communication Standard
2. Hazard Communication Management Plan
3. Employee Rights
4. The location of our company's Hazard Communication Program, SDS's and Chemical Inventory List
5. Instructions for using Safety Data Sheets
6. Detection of Hazards, Non-Routine Tasks, & Emergency Procedures
7. The measures employees can take to protect themselves from any chemical or physical hazards, including information on work practices, emergency procedures and personal protective equipment required by the employer.*
8. Training Introduction
9. Instructions for using and understanding our in-house labeling system

Management/Supervision must become thoroughly familiar with this material so that they are prepared to answer employee's questions. The HCC OR SUPERVISOR will assist you in any way.



VI.

Employee Rights under the OSHA Standard



EMPLOYEE RIGHTS UNDER THE OSHA STANDARD

Employee Rights

The purpose of the OSHA Hazard Communication Standard is to ensure that you understand the hazards of the chemicals you work with and know how to safely use those chemicals. Under this standard you are given certain rights as follows:

- The right to request in writing and obtain information on hazardous chemicals you come in contact with.
- The right to be informed of the hazardous chemicals used in your work area.
- The right to have access to our organization's written Hazard Communication Program.
- The right to file a complaint with OSHA if you believe that you have been discriminated against by exercising your rights under this law.

The Chemical Inventory List, Hazard Communication Program, and SDS's are available for your review for your specific project and are located at each individual project site

A Chemical Inventory List will be at each project site with the SDS. Our company program has been developed in an effort to create as safe a workplace as possible. We ask your cooperation in obtaining this objective.

Instructions For Using Safety Data Sheets

Specific information on the physical properties of hazardous chemicals must be supplied, on request, to employees in the form of a Safety Data Sheet. A SDS is required for each hazardous chemical in the work area. These SDS's are to be supplied by the chemical manufacturer or supplier, and their contents are to be based on the results of specific testing procedures designed to determine the toxic and hazardous characteristics of each material.

The information contained in the SDS's is there to inform you of the properties of the chemicals which you work with, and to explain how the materials may be handled safely. This knowledge allows you to protect yourself against any hazards the materials may pose to your health.

The standard SDS as required by OSHA incorporates the global harmonized system format. The SDS includes 16 specific sections as follows:

- Section 1 – Identification
- Section 2 – Hazard(s) identification
- Section 3 – Composition / Information on Ingredients
- Section 4 – First-aid Measures
- Section 5 – Fire-fighting Measures



- Section 6 – Accidental Release Measures
- Section 7 – Handling and Storage
- Section 8 – Exposure Controls /Personal Protection
- Section 9 – Physical and Chemical Properties
- Section 10 – Stability and Reactivity
- Section 11 – Toxicological Information
- Section 12 – Ecological Information*
- Section 13 – Disposal Consideration*
- Section 14 – Transport Information*
- Section 15 – Regulatory Information*
- Section 16 – Other information including date of preparation of last revision

Section in bold lettering should always be reviewed employees prior to use.

**Sections outside of OSHA's jurisdiction but inclusion of these sections is necessary for a GHS compliant*

S

DS



VII.

Multiple Employer Notification Procedures



**MULTIPLE EMPLOYER
NOTIFICATION
PROCEDURES**

Contractor/Owner Policy

The written Hazard Communication Program requires that Safety Data Sheets be available for the Owner and Owner's Employees.

Each project site will have SDS's for that specific site available for review at the project site or by calling the main office at 607-734-4151 and requesting the SDS from the Hazard Communication Coordinator. They can also be obtained by calling our online SDS provider 3E at 1-800-451-8346.

It will be each Superintendent's responsibility to inform the Owner's Representative of precautionary measures that need to be taken to protect employees during the normal workday and in foreseeable emergencies and to obtain the same information from the Owner and duly train all Streeter Associates, Inc. employees involved.

It will be each Superintendent's responsibility to inform the Owner's Representative of the labeling system used by Streeter Associates, Inc. and to obtain the same information along with alarm warning system information from the Owner and duly train all employees involved.

It is the responsibility of the Superintendent to procure and disseminate the necessary information.

Contractor/Subcontractor Policy

Contractor-Subcontractor information exchange will also be required when the exposure of the other employers' employees may occur. This information will be in turn shared with the Owner's Representative.

All written communication regarding the Hazard Communication will be duplicated so that the Hazard Communication Coordinator as well as the Superintendent will have an up-to-date file.

It is emphasized that the exchange of information is limited to those situations where the exposure of the other employers' employees may occur.



VIII.

Special Exemptions & Procedures



SPECIAL EXEMPTIONS AND PROVISIONS

Special Situations

There are several circumstances where the law is modified to address situations where a straight interpretation of the standard would not be applicable. These special situations are as follows:

1. Sealed Containers

In operations such as warehousing, retail sales, or material management, where employees only handle containers which are sealed, the following aspects of the Hazard Communication Plan will apply:

- Labels on incoming containers cannot be removed or defaced.
- Safety Data Sheets which are received with incoming containers must be kept and maintained.
- If requested by employees, safety data sheets can be obtained.
- Safety Data Sheets must be accessible to employees.
- This organization will provide an information and training program which is sufficient to protect employees from hazard presented by the contents of sealed containers should they spill or leak.

2. Laboratories

For laboratory operations, the following aspects of the Hazard Communication Plan will apply:

- Labels on incoming containers cannot be removed or defaced.
- Safety Data Sheets that are received with incoming containers must be kept and maintained.
- Employees will be apprised of the hazards of the chemicals through an appropriate information and training program.



3. Non-Routine Tasks

This section applies to jobs that are not performed on a routine basis and that may involve contact with a hazardous chemical.

Supervisors will determine what hazards are present or may be created by the task. The Superintendent is responsible for informing employees of all hazards presented by non-routine tasks. Superintendents will make sure that any special equipment, such as portable ventilators, etc., and/or personal protective equipment is available and used to perform the work safely.

4. Retail Operation

Retail operations which sell hazardous chemicals to commercial customers will provide a safety data sheet to those customers if requested. A sign will be posted indicating that SDS's are available to commercial customers.

Chemical manufacturers, importers, and distributors do not need to provide SDS's to retail operations which have informed them that the retail distributor does not sell the product to commercial customers or open the sealed containers