

FEDERAL HAZARD COMMUNICATION PROGRAM



Date: 11-15-2005

Revision Date: 01-08-2016

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FEDERAL HAZARD COMMUNICATION (Right-To-Know) (Global Harmonizing System)

Scope and Background:

The Michigan Occupational Safety and Health Act (MIOSHA) has amended Act 154, by requiring employer's to communicate to employee's information regarding the safe handling of hazardous chemicals within the workplace.

Specific Employee Rights

- The right to be notified (by employer posting) of the location of Safety Data Sheets. (SDS)
- The right to be notified (by employer posting) of new or revised Safety Data Sheets no later than five (5) working days after receipt.
- And those employees have the right to request Safety Data Sheets from their employer.

Discrimination

Employees are protected from any discrimination or discharge resulting from the request for information regarding hazardous chemicals under the Right-To-Know Law.

Records

This document shall be maintained by the Office Manager of R.W. LaPine, Inc..

Governing Policies

MIOSHA has further adopted the Federal Hazard Communication Standard, Title 29, Chapter XVII, Part 1910, Subpart Z. This standard required employers to have a written Hazard Communication Program, Labeling containers of hazardous chemicals, maintaining Safety Data Sheets, and training employees under the Michigan Right-To-Know Law and the 2012 Global Harmonizing System (GHS).

Right-To-Know:

R.W. LaPine, Inc. in its attempt to furnish employees with a place of employment, which is free from recognized hazards that could cause death or serious physical harm, has implemented the following procedures in compliance with MIOSHA Right-To-Know and the Federal Hazard Communication Standard.

Identifying Hazardous Chemicals

The Office Manager will be responsible for obtaining and maintaining Safety Data Sheets of all chemicals used within R.W. LaPine, Inc.. Information from the Safety Data Sheets will be used as a source to identify hazardous chemicals within the company.

Posting Requirements

The Office Manager of the company shall post the location of the Safety Data Sheets, along with posting notification of New or Revised Safety Data Sheets. Notification of New or Revised SDS's must be done within 5 days of their receipt.

Request for Safety Data Sheets (Employee)

- Every employee has a right to request a Safety Data Sheet. This request should be made to the Office Manager of the company.
- At no time will an employee be discharged or discriminated against by exercising their rights regarding information about hazardous chemicals in the workplace afforded by this standard.

Federal Hazard Communication**Hazard Determination**

Chemical manufacturers and importers shall evaluate chemicals produced in their workplace or imported by them to determine if they are hazardous. Employers are not required to evaluate chemicals unless they choose not to rely on the evaluation performed by the chemical manufacturer or importer.

- R.W. LaPine, Inc. will use information from the SDS provided by the manufacturer or importer as the source to identify hazardous chemicals.

Written Hazard Communication Program

R.W. LaPine, Inc. shall develop and implement a written Hazard Communication program. The following information shall be contained in the written program.

- A log of Hazardous Chemicals within the facility
- Informing employees of hazards associated with non-routine tasks
- Informing Outside Contractors of hazards their employees may be exposed to and suggested protective measures.
Note: Contractors will be required to provide SDS on material brought into the plant.
- Labels and other forms of warning.
- Safety Data Sheets, Employee information and training.

Hazards Associated with Non-Routine Tasks:

Informing Employees

- In the event that a task is required of employees that is non-routine. The procedures needed to complete that task shall be evaluated by the Job-Site Foreman and Safety Manager. This evaluation will determine if any hazardous chemical will be used and the appropriate personal protective equipment necessary to carry out the task. The Job-Site Foreman or Safety Manager will notify affected employees of the hazards and the required protective equipment necessary to perform the task. Safety Data Sheets will be used to provide employees with that information.

Informing Outside Contractors

Contractors will be informed of the location of R.W. LaPine, Inc.'s Safety Data Sheets along with the following information:

- In the event that the contractor employees will be working in an area where hazards exist. The Safety Manager will notify the contractor of the hazards and advise on the appropriate protective measures.
- Contractors upon request shall provide SDS's on any chemical they bring into the facility.

Labels:

- R.W. LaPine, Inc. shall use the labels already affixed by the chemical manufacturer, importer, or distributor of hazardous chemicals.
- Supervisors shall ensure that each container of hazardous chemicals within their areas are labeled, tagged, or marked with the following information in accordance with 2012 GHS requirements;
 1. Product identifier
 2. Supplier identifier
 3. Chemical identity
 4. Hazard pictograms
 5. Signal words
 6. Hazard statements
 7. Precautionary information
- R.W. LaPine, Inc. may use signs, placards, process sheets, batch tickets, operating procedures, or other such written material in lieu of affixing labels to individual stationary process containers.

Portable Containers:

All portable containers shall be labeled.

- When employee is completed with the chemical, any remaining residue shall be returned to the labeled container.

At no time shall any label be removed or defaced on containers of hazardous chemicals. All labels or other forms of warnings shall be legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift.

Safety Data Sheets

R.W. LaPine, Inc. shall have a safety data sheet for each hazardous chemical used within their facility. Each SDS shall be in English and shall contain the following information.

- Identification
 - Product identifier, emergency number
- Hazard (s) identification
 - Class/category
 - Signal word
 - Mixture comment
- Composition/information on ingredients
 - Chemical name, common name, CAS, ingredient %
- First-aid measures
 - Necessary measures, symptoms/effects
- Fire-fighting measures
 - Suitable & hazards from fire
- Accidental release measures
 - Precautions, PPE, emergency procedures
- Handling and storage
 - Precautions, special handling
- Exposure control/personal protection
 - PEL, engineering controls
- Physical and chemical properties
 - Appearance, odor threshold, pH, flash point, LEL/UEL, vapor pressure/density
- Stability and reactivity
 - Possible hazardous reactions, incompatible materials
- Toxicological information
 - Routes of exposure, symptoms, acute/chronic
- Ecological information
- Disposal consideration
- Transport information
- Regulatory information
- R.W. LaPine, Inc. shall maintain copies of the required SDS for each hazardous chemical within the facility, and ensure that they are readily accessible during each work shift to employees.

Employee Information and Training:

R.W. LaPine, Inc. shall provide employees with information and training on hazardous chemicals in their work area, at the time of their initial assignment, and whenever a new hazard is introduced into their work area.

Employees will be informed of the following information;

- The requirements under the Michigan Right-To-Know Law, Federal Hazard Communication Standard and Global Harmonized System.
- Any operations in their work area where hazardous chemicals are present.
- The location and availability of the written hazard communication program, including the required list of hazardous chemicals, and SDS's.

Employee Training

Employees will be trained in the following areas:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.
- The physical and health hazards of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, including specific procedures to protect employees from exposure to chemicals by use of protective equipment.
- An explanation of the GHS labeling system.
- The use of secondary containers/transfer containers.
- How to use the Safety Data Sheets.
- Safe handling and storage of hazardous chemicals.
- Spill procedures and plant evacuation procedures