

WRITTEN HAZARD COMMUNICATION PROGRAM

INTRODUCTION

A. Statement of Need

There are two (2) primary reasons which **GARMONG** will implement a Hazard Communication Program (HCP). One, **GARMONG** must comply with the Federal OSHA Standard, and the Indiana Department of Labor IOSHA Bureau of Construction Compliance (1256.59) by Much 19, 1989. Additionally, a HCP will assist the company in achieving our overall goal of a safer work place.

B. Anticipated Benefits

Several benefits are anticipated with the implementation of **GARMONG** Hazard Communication Program.

1. Avoidance of OSHA citations, violations and related compliance costs.
2. Improvement of employer-employee relations by establishing regular lines of communications.
3. Prevention of chemical-related illnesses and injuries.
4. Overall improvement of **GARMONG** safety program

All Hazard Communication Data is available to employees, their designated representatives, Assistant Secretary of Labor for OSHA and the Director of OSHA.

I. PURPOSE

The purpose of **GARMONG** Hazard Communication Program is to ensure that the hazards of all chemicals located on the job site are evaluated and that information concerning physical and health hazards is transmitted to potentially exposed employees. It is not only the intent of **GARMONG**. to fully comply with the OSHA Standard 1926.59, but also to improve the overall safety of our company. A successful Hazard Communication Program will reduce potential incidents of chemical source illnesses and injuries

II AUTHORITY

GARMONG Hazard Communication Program is required by the Occupational Safety and Health Administration, pursuant to Title 20 CFT Subpart D Part 1926.59.

III. SUMMARY OF TITLE 29, SUBPART D, PART 1926.59, HAZARD COMMUNICATION STANDARD, EFFECTIVE MARCH 19, 1989

The passage of OSHA's Hazard Communication Standard gives **GARMONG** the responsibility to establish a written, comprehensive program which includes provisions for container labeling, material safety data sheets, and employee information and training. The written program must be on each jobsite and contain a list of the hazardous chemicals at each jobsite, the means used to inform employees of hazards of non-routine tasks and methods used to inform other contractors on the jobsite of chemical hazards to which they may be exposed.

This written hazardous Communications Program outlines **GARMONG** plan to establish the objectives of the standard. Each objective will be specifically defined and discussed in this document. Additionally, this written program shall be reviewed during employee training and be available at each jobsite and the company office.

Subcontractor/Multi Contractor Interface

Any contractual agreement between **GARMONG** and subcontracting companies shall address the following concerns:

3. The subcontractor shall provide an MSDS on all hazardous substances brought onto company facilities or project sites during the performance of their work.
4. The subcontractor shall inform the company of any precautions to protect employees which may be affected.

3. The subcontractor will be informed of hazardous substances **GARMONG** are using which may affect their employees. We will make available to them this written program as a guideline.

The subcontractor shall acknowledge the receipt of the material and his intent to distribute to affected employees. The person responsible for implementing this policy is _____.

Objective 1: List of Chemicals Used at **GARMONG**

Inventory of chemicals used in our construction processes; e.g., concrete sand etc. The Job Superintendent is required to complete an inventory of chemicals.

A jobsite chemical list shall be located at the jobsite, while a master list will be on file in the company office.

Procedure for Chemical Inventory-Update.

Several methods will be utilized to maintain an updated chemical list.

1. The Safety Director will have a chemical inventory on file. New chemical products will be immediately reported to the office by the job Superintendent. **GARMONG** shall evaluate the new products MSDS to determine if the product should be included in the HCP.
2. As the new chemicals are purchased, the Job Superintendent will record the chemical on the inventory. Changes in inventory will be noted on the inventory form. A copy of the MSDS sheet for the new chemical will be sent to the jobsite where the materials are to be used.

Objective 2: Material Safety Data Sheets

Material Safety Data Sheets are the keystone to a successful hazard communication program. MSDS are designed to provide the information needed to handle chemicals safely. They provide the necessary information for training, hazard evaluation, proper handling, emergency procedures, and employee personal protective equipment. The following procedures will be implemented to ensure that **GARMONG** chemical inventory and the local purchase inventory. A copy will be sent to each jobsite.

1. Chemical manufacturers supplying **GARMONG** with products are required by law to send MSDSs with each shipment. As MSDSs are checked off against the chemical inventory, missing MSDSs should be requested from the respective manufacturer by the Safety Director.

2. The Safety Director will require a MSDS for each new chemical purchased as well as updated MSDSs for exiting chemicals. This requirement will be indicated on all purchase orders.
3. Copies of Material Safety Data Sheets will be maintained in the following locations:
 - a. Company office
 - b. Each jobsite
4. A glossary of MSDS terms will be available in the company office.
5. Updated MSDSs and new MSDSs will be immediately placed in binders in the company office and on jobsites which are using the chemical.
6. **GARMONG** will relay on each chemical manufacturer's testing and hazard evaluation of chemical products used throughout the jobsite. **GARMONG** will ensure that MSDSs are supplied, and that information contained on all MSDSs is complete.

Objective 3: Labeling Procedure (Under supervision of Safety Director)

1. **GARMONG** will relay heavily on chemical suppliers to provide labeling on heir products used at our jobsites which meet the requirements of 1926.59(f). There are three basic requirements of this section.
 - a. The label must contain: the identity of the hazardous chemical.
 - b. The label must contain; the appropriate hazard warning.
 - c. The name and address of *the* chemical manufacturer.
2. With each chemical shipment the lob Superintendent or his designee will check all containers to ensure that all labels meet the requirements outlined in this program. **GARMONG** will not accept improperly labeled containers. If there is a problem with a container, the following personnel should be immediately notified.
 - a. Manager
 - b. The Safety Director will check the chemical inventory to ensure that the MSDS has been received and updated for each product at the jobsite.

3. Local Purchases - Shelf Stock Chemicals

The following procedures will be implemented to ensure that local purchases of shelf stock chemicals are properly labeled.

- a. A local purchase inventory shall be maintained by the Job Superintendent.
- b. Purchases of shelf stock chemicals, which are not listed on the inventory, will be reported to the Safety Director.
- c. Each superintendent or his representative shall inspect local purchases for their condition and whether these items meet the minimum label requirements of 1926.59 (f) (I) (i, iii). If these items do not meet this labeling requirement and/or are in poor condition, they will be immediately returned to the supplier.
- d. The OSHA Standard does not require **GARMONG** to label portable containers which are intended for immediate use.
- e. See 1926.59 (f) (5) (i) and (iii)
 - o Identity of the hazardous chemical.
 - o Appropriate Hazard Warning.

This includes numerical ratings for the acute health, flammability, and reactivity hazards, the assignment of a personal protective equipment index, and the designation of chronic health hazards.

The Hazard Communication portion of the National Fire Protection Act (NFPA) communicates information on:

- a. Chemical identity - common names and code numbers.
- b. Degree of Acute Health Flammability and reactivity hazards numerical rating.
- c. Proper personnel protection equipment - pictogram

- d. Chronic health hazards.

Objective 4: Employee Training (Under Supervision of Our Safety Director)

The Hazard Communication Standard requires **GARMONG** to provide exposed employees with information and training on hazardous chemicals in their work areas. Additionally, **GARMONG** must also explain the components and objectives of its written Hazard Communication Program to employees.

1. Initial Training of Employees
Training of personnel will be administered by **GARMONG**. He/she will utilize written materials and will have a discussion to train all employees (charts, audio visual, etc.)
2. Proof of Training Documentation
The following documentation is recommended:
 - a. Date and time of training.
 - b. List of employees in attendance.
 - c. Name of instructor.
3. New Employees
Will receive training before working with chemicals.

Objective 5: Procedures to Asses hazards of Non-routine Tasks

Non-routine tasks are those tasks which do not occur on a frequent basis of those tasks which are not identified as a normal production tasks. However, many of the tasks required of our construction personnel will be valuated on a case-by-case basis to determine if they are to be considered a non-routine task.

Objective 6: Contract Work Performed at **GARMONG**

1. Contractors will be notified of where a list of chemicals used on the jobsite are located
2. All contractors will be required to notify **GARMONG** of hazardous chemicals brought into the premises.
3. A copy of our Hazard Communication Program will be available in the company office and on the jobsite.

4. A list of chemicals and corresponding MSDSs will be available on the jobsite.

Objective 7: Describe How Hazards of Non-Labeled pipes may be Handled

Employee involved in remodeling work, additions, demolitions, etc., will be trained to identify hazards of non-labeled pipes.

