



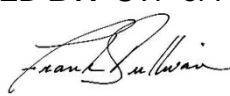
TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 1 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

Table of Contents

A. PURPOSE	1
B. SCOPE	2
C. DEFINITIONS	2
D. RESPONSIBILITIES	2
E. HAZARD COMMUNICATION PROGRAM	3
F. CHEMICAL INVENTORY	3
G. HAZARD DETERMINATION	5
H. SAFETY DATA SHEETS (SDSS)	5
I. CONTAINER LABELING	7
J. TRAINING	8
K. PURCHASING REQUIREMENTS	9
L. INFORMING CONTRACTORS	9
M. EMERGENCY RESPONSE PLANS	10
N. SPECIFIC RESPONSIBILITIES AND PROGRAM LOCATIONS	11
O. EXAMPLE OF A HAZARDOUS CHEMICAL INVENTORY LIST	11
P. RELATED DOCUMENTS	12
Q. ATTACHMENTS	12


A. PURPOSE

The Occupational Safety and Health Administration (OSHA) issued the Hazard Communication Standard in November 1983. The requirements of this procedure are intended to be consistent with the provisions of OSHA and the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS), current revision. The purpose of this standard is to give all employees who may be exposed to chemicals in the workplace the “right to know” about the potential exposures so that appropriate protective measures can be taken.

1. The Hazard Communication Standard requires employers to:

- Inform their employees of chemical hazards in the workplace;
- Ensure all chemical containers within their facilities are properly labeled;
- Make Safety Data Sheets (SDSs) available to all workers;
- Train personnel in protective measures; and



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 2 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

- Develop a written, project/office-specific Hazard Communication Program.

B. SCOPE

All employees who utilize or who may be exposed to hazardous chemicals while on the job are subject to the requirements of this program. Employees shall be provided with all required information regarding the handling, use, and storage of hazardous chemicals on their project site(s). This written program shall be available for review by all employees and will be located in each of the Envirocon offices and at all administratively distinct job sites.

C. DEFINITIONS

1. Chemical Inventory List

A project-specific chemical inventory list will be developed for each project and maintained at the job site along with the appropriate SDSs. When new chemicals arrives at a project site, a copy will be made of the SDS will be added to the project SDSs folder. Any new chemicals will be added to the project's chemical inventory list as soon as possible, preferably before they arrive on site and prior to be used by employees.

2. Subject Matter Expert

A subject-matter expert (SME) is a person who is an authority in a particular area or topic.

D. RESPONSIBILITIES

Overall responsibility for the program is assigned to the Senior Vice President of Health and Safety. Responsibility for compliance with specifics of this program shall be delegated to the:

1. Project Manager

Responsibilities include:


- Collaborating with the project safety competent person to ensure this procedure is met.
- Making project employees available for training;
- Supporting completion of all corrective actions identified from this procedure in a timely manner.

2. Assigned Health & Safety Manager (HSM), Health & Safety Officer (HSO), Health & Safety Technician (HST), or Safety Competent Person (SCP)

Responsibilities include:

- Implementation of this procedure;
- Providing guidance of this procedure to the management team;



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 3 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

- Serving as safety SME, takes an active role during project planning and execution of the field work in relationship with this procedure;
- Ensuring work is performed in accordance HASP, applicable regulations, and field safety SOPs

3. Other designated individual(s).

Responsibilities of the above employees are detailed throughout this program.

E. HAZARD COMMUNICATION PROGRAM

1. Program Components

The Envirocon Hazard Communication Program meets or exceeds all requirements outlined in OSHA 29 CFR 1910.1200 and 1926.59, or as mandated by applicable state and local laws. The key points of this program are:

- Maintain a chemical inventory;
- Ensure proper labeling of hazardous chemicals;
- Provide access to all relevant SDSs;
- Provide employee training;
- Monitor effectiveness of program; and
- Ensure copies of the Hazard Communication Program and SDSs are available to all employees.


2. Employee Rights

29 CFR 1910.1200 and applicable state standards contain specific employee rights/provisions, including the requirement that employees be informed of their rights under the standard. These rights include:

- Receipt of effective information and training on hazardous chemicals in the work area at the time of initial assignment and whenever a new chemical hazard is introduced into the work area;
- The ability of their physician or bargaining unit to receive information regarding the substances to which the employee may be exposed;
- Protection against discharge or disciplinary action for exercising the rights provided them;
- Receipt of information regarding the requirements of the standard;
- Notification of operations in the work area where hazardous materials are present; and
- Notification of the location and availability of this written program, including the required list(s) of hazardous chemicals and the SDSs required by the standard.

F. CHEMICAL INVENTORY



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 4 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

An initial inventory must be made of all chemicals used or stored at the work location (e.g., office, trailer, warehouse, mechanic truck, conex box, etc.).

1. Substances to be Included

The chemical inventory must include any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency. Chemicals covered may be in various physical states -- liquids, solids, gases, vapors, fumes, and mists -- without regard to the use of a container. For example, it may be necessary to include concrete on a demolition project where employees may cut, grind, or pulverize the material resulting in the potential for dust exposure. If there is no potential for exposure, (e.g., the chemical is inextricably bound and cannot be released), chemical is not included in the inventory.


Chemicals which may be exempt from the requirements of this program include:

- Any hazardous waste subject to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act;
- Any hazardous substance subject to the Comprehensive Environmental Response, Compensation, and Liability Act when the hazardous substance is the focus of remedial or removal action;
- Tobacco or tobacco products;
- Wood or wood products, including lumber which will not be processed, where it can be established that the only hazard posed to employees is the potential for flammability or combustibility;
- Food or beverages which are sold, used, or prepared in a retail establishment and foods intended for personal consumption of employees while in the workplace;
- Any drug, as defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption of employees while in the workplace (e.g., first aid supplies); and/or
- Any consumer product or hazardous substance as defined in the Consumer Product Safety Act and Federal Hazardous Substances Act where the employer can show that it is used in the workplace for the purpose intended by the manufacturer or importer of the product and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended (e.g., cleaning supplies).

2. Responsibilities

Preparation and updating of this inventory is the responsibility of the Envirocon Project Manager, the health and safety staff assigned to the project, and/or other designated



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 5 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

individual. This inventory must be maintained and updated as needed at the work location.

G. HAZARD DETERMINATION

Each chemical on the inventory list must be classified as hazardous or non-hazardous. The manufacturer, an Envirocon Certified Industrial Hygienist and/or Envirocon's Vice President of Health & Safety can make this determination.

1. Evaluation

Manufacturers or distributors of chemicals are required by law to evaluate and determine whether chemicals they produce or distribute are hazardous.

This source of information (available on an SDS or by contacting the manufacturer or distributor) is the primary method that will be used by Envirocon personnel to determine if a chemical is hazardous.

2. Reference Sources

In the absence of an SDS or other product manufacturer's information, other reference sources for consultation include:

- 29 CFR part 1910, Subpart Z, Toxic and Hazardous Substances;
- Applicable state or local hazardous substances list;
- Threshold Limit Values (TLVs) for Chemical Substances and Physical Agents in the Work Place, American Conference of Governmental Industrial Hygienists;
- Dangerous Properties of Industrial Materials, Sax; and
- EPA criteria of corrosivity, toxicity, flammability, and reactivity.

Employers are not required to evaluate chemicals unless they choose not to rely on the evaluation performed and provided by the chemical manufacturer.

If a manager does perform his/her own hazard evaluation, the source or criteria used to determine if a chemical is hazardous must be properly documented. This is accomplished by placing a photocopy of the source document page in the designated Hazardous Communication file(s).


When evaluating mixtures, the regulation assumes the mixture has the same hazards as the components that comprise at least 1% of the mixture. A mixture is assumed to present a carcinogenic hazard if it contains at least 0.1% of a carcinogen.

H. SAFETY DATA SHEETS (SDSS)

1. SDS Policy

When purchasing or receiving hazardous chemicals, the purchaser/receiver shall request the SDS from the manufacturer or distributor. Once the SDS is received:



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 6 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

- All employees who may use or who may be exposed to the hazardous chemical shall receive training on the proper handling, usage, and storage of the chemical;
- The hazardous chemical shall be added to the site chemical inventory and the SDS shall be placed in the site SDS binder (where the MSDSonline service is not used or the SDS is not available through the service); and
- Remove any prior versions of the SDS from the site.

2. Specific Applications


Specific applications at Envirocon offices and job sites require the Health and Safety Training Coordinator (typically the HSO/SCP) to be responsible for monitoring the SDS system, including establishing and monitoring the employee training and information program.

Specific applications on job sites include:

- When Envirocon employees may be exposed to hazardous chemicals other than those being used by Envirocon (e.g., spill response, remediation activities, exposure to hazardous chemicals used by others), the relevant SDSs must be requested from the entity responsible for the hazardous chemical (e.g., clients, subcontractors, other contractors). These SDSs shall be readily available to all employees for the duration of the job or potential exposure conditions. If necessary, submit copies of the SDS(s) to Health & Safety Document control for inclusion in the company database.
- A SDS binder shall be maintained at each job site for any hazardous chemicals used on the site.
 - These binders should be identified with a printed cover sheet in a distinguishing color and labeled SDSs.
 - The Project Manager or designee shall ensure that the work areas, storage areas, and vehicles are inspected on a regular basis to ensure that all hazardous chemicals have been included in the chemical inventory and that SDSs are available.
- The Project Manager or designee shall periodically interview personnel to ensure they know the location of, or understand how to access, this written plan, the site chemical inventory, and relevant SDSs. The Project Manager or designee may also choose to periodically review this information during safety meetings with all personnel.
- The Health & Safety Training Coordinator shall ensure that affected employees are trained when new hazardous chemicals are procured for the work site.

An alternative to maintaining a binder of SDSs on site is to use Envirocon's web-based inventory of SDSs available currently on MSDSonline to access SDSs. This alternative may only be used if (a) all site employees can readily electronically access the web site and (b) the project HSO/SCP has verified that all chemicals used on site are listed in the web-based inventory. Whether SDSs are maintained electronically or in paper format, an inventory of chemicals **MUST** be maintained at the job site. When new chemicals are



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 7 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

received on site, the HSO/SCP should forward applicable SDSs to Envirocon's Corporate Health & Safety Department for inclusion in the web-based inventory.

In the absence of an SDS, an equivalent document (discussed previously) must be obtained. These are presented to employees and filed in the same manner as SDSs. SDSs will be available for review to all employees during each work shift. Copies will be made available upon request.

When new information for a hazardous chemical becomes available, the SDS must be updated within 3 months of receipt of the new data. The manufacturer or distributor is not required to provide an updated SDS until subsequent purchases of the hazardous chemical are made.

I. CONTAINER LABELING

Manufacturers and distributors that ship chemicals are required to affix labels to containers of hazardous substances.

1. Labeling Requirements


Labels on shipped containers (i.e., the original container) shall include the following information:

- Product Identifier – The name or number used for a hazardous chemical by which the user can identify the chemical;
- Signal Word – A word used to indicate the relative level of severity of the hazard. The signal words used are "Danger" (more severe) and "Warning" (less severe);
- Hazard Statement – A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of the hazard;
- Pictogram(s) – A graphic intended to convey specific information about the hazards of a chemical;
- Precautionary Statement – A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure or improper storage or handling; and
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

Workplace labels (i.e., those on secondary containers or those applied to original containers where the original label is missing, damaged, or illegible) shall include the following information:

- The information required for labels on shipped containers; or
- Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemical, and which, in combination with other information available (e.g., SDS) will provide



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 8 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

employees with specific information regarding the physical and health hazards of the chemical.

- Label Verification and Handling

When a hazardous chemical is brought to the work site, the Envirocon Project Manager or designee is responsible for ensuring that the label on the container meets the above criteria.

The Project Manager or designee will verify that all shipped containers received for use are clearly labeled as to the contents, the appropriate hazard warning, and the name and address of the manufacturer.

The Project Manager or designee will ensure that all secondary containers are labeled with a copy of the original label or are labeled in accordance with the above section for workplace labeling.

If chemicals are transferred to other containers for immediate use by the person who transferred the material, there are no labeling requirements for the secondary container. However, if the person is no longer in control of the container for any reason (e.g., the employee needs to use the restroom or is called away from the immediate work area), a label must be affixed.

If the chemical is transferred for use by another employee or for use at a later time, then a label must be affixed to the secondary container.

J. TRAINING


The Envirocon Training Coordinator is responsible for the employee training program. He/she will ensure that all program elements are completed. In some cases, this may involve contacting Corporate Health and Safety for training materials or support. After December 1, 2013, training must include the requirements of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

1. Training Topics

Prior to working with hazardous materials, each new employee will attend a health and safety orientation that includes the following information and training:

- An overview of the requirements of the Envirocon Hazard Communication Program;
- Hazardous chemicals present in the workplace;
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area;
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 9 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

- The measures employees can take to protect themselves from these hazards, including specific procedures Envirocon has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and PPE to be used;
- The symptoms of overexposure;
- How to read labels and review SDSs and other sources of chemical information;
- Location of the SDS file and written Hazard Communication Program; and
- Emergency response.

After attending the training, each employee shall sign a form indicating their understanding of the information listed above. This form shall be maintained in the employee's training record.

Training for hazards associated with non-routine tasks shall be performed for all affected employees prior to beginning the task. This training may take place as part of the task briefing, safety meeting, or site orientation.

Accommodations shall be made for employees who are non-English speaking.

2. Introduction of New Chemical Hazards

Prior to introducing a new hazardous chemical to the work site, all affected employees shall be provided with training for the safe handling, use, and storage of the chemical.

K. PURCHASING REQUIREMENTS

A SDS shall be obtained from the manufacturer or distributor for all chemicals purchased for use at project work sites and offices. The SDSs must be maintained at the work site or office for reference by employees who use or could be exposed to the chemical. If necessary, forward a copy of the SDS to Health & Safety document control for inclusion in the web-based inventory.

While SDSs are not required for materials purchased through normal consumer vendors such as hardware stores, the employer is still required to maintain a copy for the product at the job site/office, unless utilizing the MSDSonline service as outlined in Section H.2 above.


Note:

If there is any difficulty in obtaining an SDS for a product, the HSO/SCP will contact the distributor/manufacturer to obtain the proper SDS. If necessary, there are provisions in the OSHA standard for additional action to obtain the information.

L. INFORMING CONTRACTORS

It is the responsibility of the Envirocon Project Manager to provide other contractors at the work site who may be affected by the use of hazardous chemicals with information about the



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 10 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

hazardous chemicals their employees may be exposed to at the work site and protective measures that can be taken to prevent exposure.

A copy of the Site Health & Safety Plan and/or relevant SDSs may be provided to other contractors to satisfy this requirement.

M. EMERGENCY RESPONSE PLANS

Envirocon requires all office locations and job sites to develop an emergency response plan. This plan shall be maintained on site in a readily accessible location, and reviewed/updated on a regular basis. These plans shall include procedures for responding to the most likely emergency scenarios which may occur at the office location or work site.

1. Office Locations

Each office shall have an emergency response plan on file. Typical emergency response plans for offices may include responses for fires, tornadoes, earthquakes, hazardous material incidents, and security incidents.

Office emergency response plans shall be reviewed periodically, but not less frequently than annually, to ensure accuracy of information. Employees shall be trained to the emergency response plan at the time of initial assignment, whenever any changes are made to the plan, and on a periodic basis (not less frequently than annually).

2. Site Locations

Emergency response plans for site locations are typically contained within the site-specific Health and Safety Plan. Typical emergency response plans for sites may include responses for fires, tornadoes, earthquakes, medical emergencies, hazardous material incidents, and security incidents. Site emergency response plans should be reviewed as conditions on the site change (e.g., access routes, facilities, high hazard tasks, etc.) to ensure planned responses are adequate.

Employees shall be trained to the site-specific emergency response plan at the time of initial assignment, whenever any changes are made to the plan, and on a periodic basis (not less frequently than annually). It is important that training includes a review of available SDSs for hazardous chemicals to which employees may be exposed while on site.


3. Organization and Reporting Officials

The Emergency Response Plan shall include the following:

a. The Envirocon reporting structure consisting of:

- Health and Safety Manager (Identified for each job);
- Project Manager (Identified for each job);
- Envirocon Corporate Loss Control Manager; and



TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 11 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

- Other management personnel in accordance with Health and Safety form 1403.024.g, Reference Guide for Reporting, Investigating and Documenting Envirocon Incidents.

b. Site/Office-specific reporting structure consisting of:

- Project Manager (site) or Office Manager (office);
- Emergency Coordinator (site and office)
- Alternate Emergency Coordinator (site and office)

c. Location of First Aid equipment

i. Fire/Accident/Injury:

- Location of first aid kit(s) and AED;
- Location of fire extinguishers;
- Fire department telephone number;
- Ambulance service telephone number;
- Police department telephone number;

ii. Hospital:

- Telephone number;
- Address; and
- Map and directions to hospital.

N. SPECIFIC RESPONSIBILITIES AND PROGRAM LOCATIONS

The Senior Vice President of Health & Safety maintains overall responsibility for all aspects of the Hazard Communication Program.

Site management (e.g., Project Manager, Health & Safety Manager/Officer/Tech) are responsible for ordering chemicals, maintaining the chemical inventory and site SDSs, and container labeling requirements.

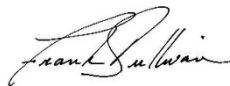
A copy of the Hazard Communication Program shall be made available at each office and job site location.

Location-specific SDSs are located at each office or job site, unless there is a plan to access SDSs through Envirocon's online database, SDSonline. A chemical inventory shall be maintained at each location, regardless of the use of the online database.

Questions regarding this program shall be directed to the health & safety staff assigned to the location or to the Senior Vice President of Health & Safety.

O. EXAMPLE OF A HAZARDOUS CHEMICAL INVENTORY LIST

**STANDARD OPERATING PROCEDURE**

TITLE: Hazard Communication Program		PREPARED BY: Jerry Hipp
SOP NO: 1403.010	PAGE: 12 of 12	AUTHORIZED BY: SVP of H&S 
EFFECTIVE DATE: 10/1993	REVISION DATE: 07/2017	

CHEMICAL NAME	MANUFACTURER AS LISTED ON SDS	LOCATION	QUANTITY
Lithium Grease	AMOCO	Job Trailer	4/boxes
Dieselall Engine Oil	Dryden Oil Co.	Job Trailer	1 barrel
Engine Coolant	Radiator Specialty Co.	Job Trailer	1 barrel
Starting fluid	Radiator Specialty Co.	Mechanic Truck	1 case
Starting fluid (ethyl ether)	Radiator specialty Co.	Mechanic Truck	1 case
Liquid Wrench	Radiator specialty Co.	Mechanic Truck	1 case
10 W Motor Oil	Marathon Oil Co.	Job Trailer	2 barrels
20W-20 Motor Oil	Marathon Oil Co.	Job Trailer	1 barrel
30 W motor Oil	Marathon Oil Co.	Job Trailer	1 barrel
40 W Motor Oil	Conoco Oil Co.	Job Trailer	1 barrel
Diesel Fuel	Amoco Oil Co.	Fuel Truck	250 gal
Hydraulic Oil	Amoco Oil Co	Job Trailer	1 barrel
Gasoline	Conoco Oil Co.	Fuel Truck	250 gal
WD-40 Aerosol	WD-40 Company	Mechanic Truck	1 case
Acetylene	Praxair Inc.	Mechanic Truck	1 bottle
Air	Praxair Inc.	Mechanic Truck	1 bottle
Engine Brite Degreaser	Radiator Specialty Co.	Mechanic Truck	1 case

P. RELATED DOCUMENTS

None.

Q. ATTACHMENTS

None.