

HAZARD COMMUNICATION



Doc. Type:	Program	Effective Date:	5/1/2017
Section:	05	Revision Number:	01
Status:	Issued	Last Revised:	2/27/2018

1. INTRODUCTION

In Compliance with OSHA Federal Regulation 29 CFR 1910.1200, the following written Hazard Communication Program is implemented for the employees of **H2 Enterprises, LLC (H2)**.

This program applies to all work operations where **H2** employees may be exposed to hazardous substances under normal working conditions or during an emergency situation. A copy of this program is made available to any new employee upon hiring, and will be made available upon request by any existing employee. The Director, HSE and/ or the responsible Project Safety Coordinator are to be notified when a copy of this program is requested.

2. POLICY

Under this program, employees will be informed of the contents of the Hazard Communication Standard, the properties of hazardous chemicals with which they work, safe handling procedures, correct personal protective equipment to use and proper disposal measures to take to protect themselves from harmful exposures to these chemicals. These goals are to be attained for our Company by providing the following:

- A current inventory list of hazardous chemicals in used our workplaces.
- Current original (Hard or Electronic) and copies of Safety Data Sheets (SDS).
- NFPA or HMIS labels on all containers of hazardous chemicals.
- Employee training and education on hazardous substances

This program will be updated when new chemicals or hazardous materials are introduced into the working environment and at a minimum, will be reviewed annually by the Director of HSE. The Director of HSE will periodically check chemical purchase requests to be sure a statement requesting a Safety Data Sheet appears on the purchase request before being processed.

3. INVENTORY LIST OF HAZARDOUS CHEMICALS

Each Project Purchasing Agent will maintain an inventory list of chemicals or products containing hazardous chemical ingredients that are used at that project. The original list is maintained by the Director of HSE and copies can be made available upon request by employees, as well as found with our current SDS binder books.

HAZARD COMMUNICATION



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4. SAFETY DATA SHEETS (SDS)

Safety Data Sheets will provide our employees with specific information regarding the chemicals they will use. A three-ring binder or access to electronic materials identified as SDS's on all chemicals used at each project can be found in the job trailer on location, or where work permits are issued at each host-facility. These copies will be accessible at all times to all employees.

The original documents will be maintained and kept by the Director of HSE.

The Director of HSE is responsible for acquiring and updating SDSs. He will insure contact with the vendor or chemical manufacturer in the event they have not supplied a current SDS with an initial shipment. New chemicals shall not be used until an SDS has been obtained and reviewed by the Director, HSE. The hazardous chemical inventory list will be alphabetized and numbered to correspond to the format with which the SDSs have been filed in the binder.

The SDSs currently in place at **H2** follow two basic formats consisting of the OSHA standardized Form 174 that contains 8, sections, or the new 16 section ANSI Z 400.1 form, and both forms should provide the following information:

- Chemical name, manufacturer, address, emergency phone numbers.
- Common names and ingredients determined to present a hazard.
- Health hazards of the chemical mixture, including signs and symptoms of exposure, primary routes of entry, target organs affected, and if listed as a carcinogen by the NTP, or IARC, or OSHA.
- First aid measures for injury control.
- Firefighting information (flammable ranges and fire extinguisher type).
- Provisions for spill control, containment and cleanup.
- Proper storage and handling requirements (heat concern/ shock control, spark-proof tool use, bonding, grounding, etc.)
- Control measures (engineering practices, personal protective equipment, and exposure guidelines or limits - PEL's, TLV's, STEL's, or Maximum Concentration use.)
- Physical and Chemical Characteristics (color, smell, pH, solubility).
- Reactivity Data (incompatible chemicals to prevent contact with).
- Toxicological information (animal study reference, lethal concentrations).
- Ecological information (bird, fish, animal, plant concerns)
- Disposal considerations (EPA guidelines for proper disposal).
- Transportation information (DOT guidelines, placards, proper transport).
- Regulatory information (government listed reportable quantity if released).
- Other information (author, date issued, hazard ratings) NFPA or HMIS

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5. LABELS AND OTHER FORMS OF WARNING

Each Project Purchasing Agent will ensure that all hazardous chemicals at each H2 project are updated, as necessary. At a minimum, labels will list the chemical identity, appropriate hazard warnings (NFPA or HMIS) and the name and address and telephone of the manufacturer.

NFPA labels are diamond-shaped with 4 colored diamonds and hazard identification numbers that correspond to the following:

RED	=	Fire Hazard
YELLOW	=	Reactivity Hazard
BLUE	=	Health Hazard
WHITE	=	Special Instructions

0 = material offers little or no hazard

1 = material offers minimal risk

2 = material offers a moderate risk

3 = material offers a very serious risk

4 = material offers extreme danger

OX= oxidizer, ACID= acid, ALK = alkali, -W- = water reactive, BASE= base, COR = corrosive, RAD= radioactive

HMIS labels are usually rectangular in shape and have the same color coding and numbering as the NFPA labels, except there is no special instruction section present. Instead you will notice a white or green section entitled PPE, or personal protective equipment. A coded legend will be located on the righthand side of the label, that uses alphabet letters A – K and X, which will correspond to a certain type of PPE to wear.

DOT labels are displayed on container items for transfer, and they consist of a classification number, background color, appropriate hazard description, and pictograph or symbol:

Class 1 = orange, explosives, and bursting ball

Class 2 = white, green, yellow/black, gas, flame/circle+ flame

Class 3 = red, flammable liquids, flame

Class 4 = red/white stripe, flammable solids, flame

Class 5 = yellow/ black, oxidizing material, and flame

HAZARD COMMUNICATION



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Class 6 = white/black, poisons, skull & crossbones

Class 7 = white/black/yellow, radioactive, and a propeller

Class 8 = black/white, corrosives, damaged metal/flesh

Class 9 = black/white/stripes, miscellaneous

Each Project Safety Coordinator will refer to the inventory list and corresponding SDS to assist in verifying correct label information. All primary containers of hazardous chemicals will be checked by the individual Project Safety Coordinator before being placed in the working environment for use by employees to be sure they are properly labeled.

No **H2** employee is ever allowed to remove or deface a label on incoming containers of chemicals. If a label is found to be missing, defaced or illegible, do not use this material until a proper label has been obtained from the Project Safety Coordinator and put into place. Always read the label and check the hazard ratings/warnings before using any product that contains hazardous ingredients.

If chemicals are transferred from a primary container to a secondary (portable, smaller) container that is intended for immediate use or under the direct control of the intended employee, or by the end of the work shift, no labels are required on the portable container. If these conditions cannot be met, then the employee conducting the chemical transfer shall request a proper label from the Project Safety Coordinator.

6. EMPLOYEE EDUCATION AND TRAINING

Any employee who works with or has the potential for hazardous chemical exposure will receive training on the Hazard Communication Standard as conducted by the Project Safety Coordinator or outside contract training sources as identified. This training will take place upon initial hire and on an as-needed basis, thereafter.

When **H2** employees are assigned work at other employer job- sites, they will receive Site Specific Orientation to that host- facility employer's Hazard Communication Program.

A program that uses both audio and visual materials in a classroom type setting will be utilized for this purpose. Whenever a new hazard is introduced, additional training will be provided.

Regular safety meetings will also be used to review the information presented in the initial training. Foremen and other supervisory personnel will be trained regarding hazards and appropriate protective measures so that they will be able to answer questions from employees and provide daily monitoring of safe work practices.

All training is documented, signed and dated by the employee and the person performing the training. This documentation is maintained in each **H2's** employee safety file and is available upon request.

The training program will emphasize the following:

- Summary of the OSHA Standard and this written program

HAZARD COMMUNICATION



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- Chemical and physical properties of hazardous materials and methods that can be used to detect the presence or release of chemicals.
- Physical hazards of chemicals (fire or explosion potentials).
- Health hazards, including signs and symptoms of exposure and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (PPE required, proper use and maintenance of PPE, safe work practices or methods to assure proper use and handling of chemicals, and procedures for emergency response).
- Location of SDS's and how to read and understand this information.
- How to read and interpret the information on warning labels and how to obtain additional information.

Retraining will be performed by **H2** management or outside contract training services when the hazards change, or when a new hazard is introduced into the workplace.

7. NON-ROUTINE TASKS

Before any non-routine task is performed, employees shall be advised that they must contact their immediate Supervisor or the Project Safety Coordinator for special precautions to follow. Any other personnel who could potentially be exposed during this non-routine task will also be informed of the same special precautions.

8. OTHER PERSONNEL EXPOSURE (CONTRACTORS)

It will be the responsibility of the Director, HSE or Project Safety Coordinator to provide other personnel, outside contractors or subcontractors who perform work on the premises of each **H2** project with the following information:

- hazardous chemicals to which they may be exposed while in the workplace.
- measures to control the potential of exposure.
- location of SDS's for all hazardous chemicals.
- emergency procedures to follow if they are exposed.

The Director of HSE or each Project Safety Coordinator will also be responsible for contacting each contractor/ subcontractor before work is started to obtain any information concerning chemical hazards that will be brought onto any **H2** project sites.

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9. NON-ENGLISH SPEAKING EMPLOYEES

Provisions will be made to include information specific to their language. Hazard Communication training and SDS information will be provided in Spanish, as needed.

10. CONCLUSION

The safety and well-being of each **H2** employee and those working around us will always be of utmost importance to **H2** management. Therefore, safety training will continue to be an on-going process with our Company. Through pre-employment orientation, job specific training and hands-on training throughout each employee's tenure with **H2**, we will do all that is within our abilities to maintain safe and efficient communication of workplace e chemical hazards.