

# Hazard Communication Program

## 1. PURPOSE

In order to comply with 29 CFR 1910.1200 Hazard Communication, the following written Hazard Communication Program has been established for this company. Under this program, you will be informed about the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which you work, safe handling procedures, and measures you can take to protect yourself from these chemicals. You also will be informed of the hazards associated with non-routine tasks, such as cleaning in confined spaces, and the hazards associated with chemicals in unlabeled pipes.

## 2. GENERAL PROGRAM MANAGEMENT

### a. Responsibility

The Inside Supervisor of the Warehouse shall be the Safety Officer and is responsible for this program. He/she will review and update the program, as necessary. Copies of the written program may be obtained online anytime from <http://safety.amerevent.com>.

### b. Program Review and Update

In order to have an effective Hazard Communication Program, the program should be reevaluated on a quarterly basis. The Material Safety Data Sheets (MSDS) will be renewed every three years in order to assure that all chemicals at this company are under the program. Training and review of the program also will be done under these circumstances:

- a. Before new employees begin work requiring use of any listed material.
- b. Before new chemicals or hazardous materials are introduced into work areas.

## 3. METHODS OF COMPLIANCE

**List of Hazardous Chemicals** The Safety Officer will make a list of all hazardous chemicals and related work practices used in the facility, and will update the list as necessary. Our list of chemicals identifies all of the chemicals used in the work areas. A separate list is available for each work area and is posted there. Each list also identifies the corresponding MSDS for each chemical. A master list of these chemicals will be maintained by, and is available from the Safety Officer. (Appendix A)

### a. Container Labeling

The supervisor in each section will verify that all containers received for use will:

- Be clearly labeled as to the contents;
  - a. Note the appropriate hazard warning; and
  - b. List the name and address of the manufacturer.

The Safety Officer will refer to the corresponding MSDS to assist in verifying label information. Containers that are shipped from the plant will be checked by the supervisor of shipping and receiving to make sure all containers are properly labeled.

The Safety Officer will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with generic labels. For help with labeling, please see our Safety Officer. The Safety Officer will review the company labeling system quarterly and update as required.

### b. Material Safety Data Sheets

The Safety Officer will be responsible for obtaining and maintaining the data sheet system for the company. The Safety Officer will review incoming Material Safety Data Sheets for new health or safety information. He/she will see that any new information is passed on to the affected employees.

Copies of MSDS's for all hazardous chemicals to which employees of this company may be exposed will be kept online and viewable anytime <http://safety.amerevent.com> at the warehouse manager's desk. A hard copy booklet will also be available there.

MSDS's will be available to all employees in their work areas for review during each work shift. If MSDS's are not available or new chemicals in use do not have MSDS's, immediately contact the Safety Officer.

To ensure Material Safety Data Sheet information is current, replacement data sheets will be requested upon notification of a change in the product, or reason to believe a change has been made. Communication from our Purchasing Department is required each time a new or substitute chemical product is brought into the facility. In such cases, a Material Safety Data Sheet will immediately be requested from the supplier/manufacturer. To request a copy of material safety data sheet, which is not currently on file, two (2) letters will be sent to the supplier at a two-week interval. (See Appendix B)

**c. Employee Training and Information**

The Safety Officer is responsible for the employee training program. He/she will ensure that all elements specified below are carried out.

Prior to starting work, each new employee of this company will attend a health and safety orientation and will receive information and training on the following:

- . An overview of the requirements contained in the Hazard Communication Standard;
  - a. Chemicals present in their workplace operations;
  - b. Location and availability of our written hazard program;
  - c. Physical and health effects of the hazardous chemicals;
  - d. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
  - e. How to lessen or prevent exposure to these chemicals through usage of control/work practices and personal protective equipment;
  - f. Steps the company has taken to lessen or prevent exposure to these chemicals;
  - g. How to read labels and review MSDS's to obtain appropriate hazard information; and
  - h. Location of MSDS file and hazardous chemical list.

After attending the training class, each employee will sign a form to verify that they attended the training, received the written material, and understood this company's policies on Hazard Communication. (Appendix C) Prior to a new chemical hazard being introduced into any section of this company, each employee of that section will be given information as outlined above. The Safety Officer is responsible for ensuring that MSDS on the new chemical(s) are available.

**d. Hazardous Non-Routine Tasks**










Any maintenance or other infrequent work shall be reviewed by the Safety Officer for potential exposure to hazardous chemicals or other safety problems (e.g., cleaning tanks, entering confined spaces, etc.). A written procedure shall be agreed on, detailing appropriate actions and safeguards for the control of exposure to any hazardous chemicals. This procedure shall be used whenever the work is to be performed. Permits shall be required for working on energized systems, and valve closures. Appropriate lock-out and tag-out procedures shall be followed. (See Facility's Lock-out Tag-out Policy).

The written procedure will include:

- a. Specific chemical hazards;
- b. Personal protective equipment or safety measures the employee should use; and

- c. Measures the company has taken to lessen the hazards including ventilation, respirators, presence of other employees, emergency procedures and etc.
- a. **Informing Contractors**  
 It is the responsibility of the Safety Officer to provide contractors and employees the following information:
- Hazardous chemicals to which they may be exposed to while on the job site; and
    - a. Precautions the employees may take to lessen the possibility of exposure by usage of protective measures.
- The Safety Officer will be responsible for contacting each contractor before work is started in the company to gather and disseminate any information concerning chemical hazards that the contractor is bringing to our workplace.

### HCS Pictograms and Hazards

 <ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Mutagenicity</li> <li>▪ Reproductive Toxicity</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Target Organ Toxicity</li> <li>▪ Aspiration Toxicity</li> </ul>	 <ul style="list-style-type: none"> <li>▪ Flammables</li> <li>▪ Pyrophorics</li> <li>▪ Self-Heating</li> <li>▪ Emits Flammable Gas</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>	 <ul style="list-style-type: none"> <li>▪ Irritant (skin and eye)</li> <li>▪ Skin Sensitizer</li> <li>▪ Acute Toxicity</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritant</li> <li>▪ Hazardous to Ozone Layer (Non-Mandatory)</li> </ul>
<p style="text-align: center;"><b>Gas Cylinder</b></p>  <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	<p style="text-align: center;"><b>Corrosion</b></p>  <ul style="list-style-type: none"> <li>▪ Skin Corrosion/Burns</li> <li>▪ Eye Damage</li> <li>▪ Corrosive to Metals</li> </ul>	<p style="text-align: center;"><b>Exploding Bomb</b></p>  <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>
<p style="text-align: center;"><b>Flame Over Circle</b></p>  <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<p style="text-align: center;"><b>Environment (Non-Mandatory)</b></p>  <ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	<p style="text-align: center;"><b>Skull and Crossbones</b></p>  <ul style="list-style-type: none"> <li>▪ Acute Toxicity (Fatal or Toxic)</li> </ul>



## Appendix B

### Letter Requesting an MSDS

Dear \_\_\_\_\_:

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) requires employers to be provided Material Safety Data Sheets (MSDS) for all hazardous substances used in their facility, and to make these MSDS's available to employees potentially exposed to these hazardous substances.

Therefore, we request a copy of the MSDS for your product listed as Stock Number \_\_\_\_\_. We did not receive an MSDS with the initial shipment of the \_\_\_\_\_ we received from you on \_\_\_\_\_. We also request any additional information, supplemental MSDS's, or any other relevant data that your company or supplier has concerning the safety and health aspects of this product.

Please consider this letter as a standing request to your company for any information concerning the safety and health aspects if using this product that may become known in the future.

The MSDS and any other relevant information should be sent to us within \_\_\_\_\_ days. Delays in receiving the MSDS information may prevent use of your product. Please send the requested information to \_\_\_\_\_. Please be advised that if we do not receive the MSDS on the above chemical by (date), we may have to notify OSHA of our inability to obtain this information. It is our intent to comply with all provisions of the Hazard Communication Standard (1910.1200) and the MSDS's are integral to this effort.

Your cooperation is greatly appreciated. Thank you for your timely response to this request. If you have any questions concerning this matter, please contact our phone center at 314-255-2882.

Sincerely,

AEG Rentals, Inc.

**Appendix C1**

**HAZARD COMMUNICATION TRAINING CERTIFICATION**

I, \_\_\_\_\_, received Hazard Communication Training as described within the Hazard Communication Program. The training was conducted on: |\_\_|\_\_|\_\_\_\_.

Employee Signature	Social Security Number	Work Area

I hereby certify that the above named employee has been provided with Hazard Communication Training on: |\_\_|\_\_|\_\_\_\_.

Instructor's Signature\_\_\_\_\_

SCAN AND EMAIL COMPLETED COPY TO: [EMPLOYMENT@AMEREVENT.COM](mailto:EMPLOYMENT@AMEREVENT.COM). KEEP ORIGINAL IN LOCAL FILE.

**Appendix C2**

**HAZARD COMMUNICATION TRAINING CERTIFICATION**

I, \_\_\_\_\_, received Hazard Communication Training as described within the Hazard Communication Program. The training was conducted on: |\_\_|\_\_|\_\_\_\_.

Employee Signature	Social Security Number	Work Area

I hereby certify that the above named employee has been provided with Hazard Communication Training on: |\_\_|\_\_|\_\_\_\_.

Instructor's Signature\_\_\_\_\_

SCAN AND EMAIL COMPLETED COPY TO: [EMPLOYMENT@AMEREVENT.COM](mailto:EMPLOYMENT@AMEREVENT.COM). KEEP ORIGINAL IN LOCAL FILE.