

# BEI

## Hazard Communication Program for OSHA Standard 29CFR 1910.1200. (Hazcom 2012 / GHS)

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**Purpose:** This Hazard Communication Program is intended to ensure compliance with Occupational Health and Safety Administration (OSHA) requirements for the adoption of the UN Globally Harmonized System (Hazcom 2012 / GHS) and to provide a safe work environment for employees and independent contractors working at BEI.

**Policy:** BEI is committed to providing a safe and healthy workplace for all staff. We have adopted this program to prevent illness and injury produced by exposure to liquids, solids, gases vapors, fumes and mists and to comply with OSHA Hazard Communication Standard, 29 CFR 1910.1200 as detailed in Hazcom 2012 / GHS regulations.

This document is essential to assist BEI in implementing and complying with the Standard and addressing our:

- use of labels, placards, posters and other forms of warning,
- use of Safety Data Sheets (SDSs),
- hazardous chemical inventory,
- communication of hazards by SDSs and labels,
- training of employees and independent contractors,
- procedure for non-routine tasks,
- communications with other employers concerning hazardous materials used on our site,
- record keeping

**Administration:** Danny Weston, Safety Coordinator is responsible for the implementation of this program and its review, maintenance and updating as necessary.

- All employees, including permanent and independent contractors, who may have exposure to hazardous chemicals during normal work or in emergency situations must comply with the practices and procedures outlined in this program.
- BEI through people in specific supervisory positions will be responsible for maintaining OSHA records at all times.

- BEI through people in specific supervisory positions will be responsible for training, maintaining training records and making this program available to employees and contractors.

### Container Labeling:

Primary Containers: Designated supervisors will ensure all containers of hazardous materials received for use or shipped by BEI are clearly labelled according to the regulated requirements of Hazcom 2012 (GHS). This includes the name of the material (Trade Name or chemical name), hazard pictogram(s), signal word, hazard statements, precautionary statements, and the manufacturer or distributors name address and emergency contact information.

Secondary Containers: When the contents of large containers are broken down into smaller or secondary containers for in-house use (such as spray bottles) BEI will ensure that the label shows the chemical identity and appropriate warnings as required by OSHA. The supervisors in each work area will ensure that all secondary containers are properly labeled.

Portable Containers and Pipes: Portable containers are those in which an employee or independent contractor transfers chemicals from a labeled container to a portable one solely for immediate use. Designated supervisors will ensure all containers of hazardous chemicals are clearly labeled with the identity and appropriate hazard warnings.

Designated supervisors will post placards, signs and other written or illustrated materials displaying the same information as labels on stationary containers and processes. Employees and independent contractors shall have the opportunity to review these signs and placards at any time during their shift, by contacting their immediate supervisor.

Safety Coordinator, Job Superintendent and Project Managers will review labeling procedures from time to time and update as necessary.

Safety Data Sheets (SDSs): Danny Weston, Safety Coordinator will establish an SDS program to collect, manage, monitor and update SDSs and the SDSs library as required. No container will be released for use until the SDS is received and the information verified.

Supervisors must first obtain approval from Danny Weston, Safety Coordinator for all new hazardous chemicals to be shipped or used by employees.

The Job Superintendent who purchases chemicals will be responsible for obtaining all SDSs for hazardous materials used or shipped by employees or contractors. Designated supervisors are thereafter charged with informing employees and independent contractors of any new information, prior to their exposure.

Employees will contact the Job Superintendent if an SDS has not been supplied with an initial shipment.] the Job Superintendent will then contact the chemical manufacturer or distributor to obtain the necessary information. A copy of the

letter or email to the manufacturer is to be kept on file. If the request is made by phone, details of the call must be logged.

If BEI has hazardous materials on site but is unable to contact the distributor BEI will access the information by phone at [1-800-451-8346](tel:1-800-451-8346) or [1-760-602-8703](tel:1-760-602-8703)

Employees of BEI and independent contractors shall have the chance to view the master list of SDSs at any time during their work shifts and are required to notify their immediate supervisor if they discover an SDS is not available.

Supervisors will ensure that the SDSs are conveniently located close to the work area where the hazardous materials are used.

**Hazardous Chemical Inventory Job Superintendent or Project Manager** is responsible for compiling, maintaining and updating a list of all known hazardous materials used on site by employees or independent contractors. The inventory shall be kept at each work location with the SDSs.

BEI employees and independent contractors shall be allowed to review the inventory and obtain information from the SDS at any time during their work shift. Supervisors shall be responsible to ensure the inventory is available at all times. A sample, blank hazardous chemical inventory is included in Appendix A.

When new chemicals are received **Job Superintendent or Project Manager** will update the inventory as required, including the date when the chemical was introduced. Supervisors will ensure that separate lists of hazardous chemicals used at each location are maintained and posted in individual work areas.

**Chemicals Used in Unlabeled Pipes:** All employees and independent contractors working in areas where chemicals are transferred through unlabeled pipes shall contact their immediate supervisor prior to starting work, and obtain information on:

- the chemical(s) in the pipe(s)
- the potential hazards of those chemical(s)
- details of the safety precautions to be taken

**Employee and Independent Contractor Safety Orientation:** Before commencing any work at BEI Safety Coordinator, Job Superintendent and Project Managers will make sure all new hires and contractors receive a safety orientation appropriate for the nature of their work.

For all BEI staff and permanent contractors, the minimum safety orientation will include:

- an overview of the Corporate Safety Policy
- a detailed review of the emergency response action plan
- a detailed review of hazardous chemicals used onsite

For Temporary Contractors and Consultants, the safety orientation will include:

- a review of the specific worksite hazards and emergency procedures e.g. evacuation.
- the general safety requirements e.g. required PPE

The orientation given to casual visitors will be determined on a case by case basis by Job Superintendent or Project Manager.

Records must be kept of all orientations. Employees conducting orientations must request the certification of training from contractors and new hires. In addition to training and orientation, new employees must read and sign the company safety rules (See Appendix B -New Employee Commitment to Safety Rules).

**Employee Training -Hazardous Chemicals:** BEI will provide or will arrange to provide by competent and qualified people, training to all employees who are exposed or may be exposed to hazardous chemicals. Retraining will also be provided when a new hazard is introduced into the workplace or new hazard information becomes available for chemicals already in use onsite. Supervisors will receive special training on chemical hazards and protective measures so they can monitor staff and provide appropriate safety advice. As a minimum, such training will include:

- an overview of the Hazard Communication Standard,
- an overview of the hazard communication program at BEI and the location of the written program.
- a description of the physical risks of chemicals used
- a description of the health risks, including the signs and symptoms of exposure and any medical conditions that might be aggravated by exposure,
- procedures to follow if overexposure is suspected,
- information on how to detect the presence of a hazardous chemical release such as the odor or visual appearance, a description of the emergency procedures,
- steps the company has taken to eliminate or reduce exposure,
- a description of the emergency procedures,
- a description of protective measures against chemical exposure such as control or work practices and the use and maintenance of PPE,
- a description of the procedures and equipment to be used when cleaning hazardous spills and leaks,
- details of where to find the SDS files, the order of information in a Hazcom / GHS compliant SDS, and how to read and interpret the information,
- details of how to read and interpret information on Hazcom 2012 / GHS labels,
- details on the location of written hazard evaluation procedures, this written program, and the hazardous chemical inventory.

Danny Weston, Safety Coordinator will make all training materials available to all employees and independent contractors, and will ensure each employee signs a form to verify attendance and receipt of training materials.

**New Task Instruction:** Supervisors will ensure that all staff performing a critical task for the first time, receive instruction by a competent person prior to commencing the work. This instruction must include the use and care of any safety equipment and PPE. New employees and contractors will be observed on all critical tasks when performing them on their own for the first time following instruction.

**Hazardous Non-Routine Tasks:** BEI will provide, or will arrange to provide by qualified persons, special training to all employees before they start work on non-routine tasks. At a minimum, such training will include:

- the hazardous chemicals that may be present in such work
- details of the safety precautions to be taken
- details of the measures BEI is taking to reduce or eliminate the hazards
- details of emergency procedures.

**Informing Independent Contractors of Hazardous Chemicals Used Onsite:** BEI will determine if employees of other employers or contractors will be exposed to hazardous chemicals used at our Facility or shipped from us. If exposure is likely supervisors will make employees of other companies aware of the hazards and will suggest necessary precautions. Supervisors will provide them with:

- a copy of the SDS master list
- an explanation of the necessary precautions
- information on hazard labels, including pictograms, or numerical labelling (if used) and details on how to read and interpret the labels.

**Record Keeping:** BEI will maintain its hazardous chemicals inventory for chemicals used at or shipped from the Facility for at least 30 years. Such list will be maintained in accordance with 29 CFR 1910.1020 "Access to Employee Exposure and Medical Records".

Records will also be kept of employee safety orientations and hazardous chemical training. Any retraining will also be recorded.

**Program Availability:** Employees of BEI and their representatives and independent contractors can obtain copies of this program upon request from their immediate supervisor.

