



# *Hazard Communications Program*

14945 La Palma Drive Chino, CA 91710  
Office (909) 393-5419 Fax (909) 606-0163  
<http://secc-corp.com>

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## **Purpose**

The purpose of this program is to establish uniform policies and procedures, to evaluate all hazardous materials used by our company and to transmit this information to all employees who will use or be exposed to such materials.

### ***Hazardous Materials Inventory***

Tony Nichols or a designee will keep current an inventory list of all known hazardous substances present in our workplace. Specific information on each noted hazardous substance could be obtained by reviewing the SDS's located at our main office and in each department.

### ***Proposition 65 List of Chemicals***

Tony Nichols or designee is responsible for obtaining updates of Proposition 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Proposition 65 list, warning requirements take effect 12 months from the date of listing.

### ***Safety Data Sheets***

Safety Data Sheets (SDS's) will be maintained and binder clearly labeled and accessibly to employees during working hours. Employees will be trained in the hazards of materials they use by their supervisor.

If any new and significant health information is added to an SDS, or we receive a revised SDS, we will update the SDS book. We will also, if necessary, retrain the employees using this material.

### ***Responsibilities***

Tony Nichols or a designee will be responsible for:

- Reviewing the potential hazards and safe use of chemicals
- Ensuring that all containers are labeled, tagged or marked properly
- Providing new-hire and annual training for employees before the initial training date of expiration.
- Training Foreman on emergency response sequence by notifying the proper authorities of the release.
- Maintaining training records
- Properly selecting and caring for personal protective equipment
- Directing the cleanup and disposal operations of the spill control team
- Informing outside contractors who are performing work on company property about potential hazards
- Contacting chemical manufacturers and/or distributors to obtain SDS's and secondary labels for hazardous chemicals used or stored in the workplace

Employees are responsible for the following aspects of the hazard communication program:

- Identifying hazards before starting a job.
- Reading container labels and SDS.
- Notifying the supervisor of torn, damaged, or illegible labels or of unlabeled containers.
- Using controls and/or personal protective equipment provided by the company to minimize

exposure.

- Following company instructions and warnings pertaining to chemical handling and usage.
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement.
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals.
- Participating in training.
- Site foreman is responsible to initiate an emergency response sequence by notifying the proper authorities of the release.

### ***Hazardous Materials Storage***

We must clearly identify hazardous material storage areas. Hazard warning signs will be used when needed, and hazard warning signs should never be used when no hazards exist.

The hazardous nature of many substances is frequently intensified and more widely dispersed during combustion. Good storage and housekeeping practices will ensure that unnecessary ignition sources and/or combustible fuel are physically separated from hazardous materials as outlined by the SDS.

### ***Fire Hazards***

- Combustible liquids - a liquid with a flash point (FP) between 100 degrees F & 200 degrees F
- Flammable liquids - a liquid with a FP less than 100 degrees F
- Flammable aerosols
- Flammable gases, e.g., propane, acetylene
- Flammable solids, e.g., magnesium
- Oxidizers, e.g., oxygen, chlorine, nitric acid
- Pyroporic materials
- Substances that spontaneously ignite
- Explosives

### ***Static Electricity Explosion Hazards***

Serious injuries are possible when low humidity, gas vapor concentrations and static sparks combine to create explosions. Removal of one of these conditions will reduce the possibility of such an event. Proper grounding of flammable liquid containers and using approved pumps are recognized prevention techniques.

### ***Labels and Other Forms of Warning***

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

We will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

- Product identifier
- Pictogram(s)

- Signal word
- Hazard statement(s)
- Precautionary statement(s)

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer does not require a label. If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the area will be labeled with a warning placard.

Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow. (Please note that this not a requirement of the OSHA HCS but a best practice or requirement of local jurisdiction.)

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

### ***Employee Information and Training***

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

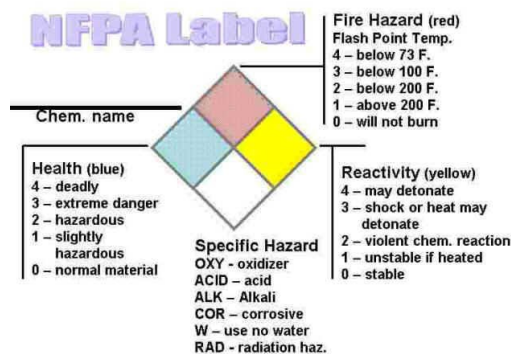
- Requirements of the Hazard Communication regulations.
- Operations in the work area where hazardous chemicals are present.
- Location and availability of the hazard communication program, chemical inventory list and SDS.
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released.
- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area.
- Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used.
- Explanation of the labels received on shipped containers.
- Explanation of the workplace labeling system.
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.

- Review NFPA labeling.
- All Managers will be trained for exposure in emergency procedures by notifying the proper authorities of the release.

Key points to remember is that this system uses a four-color strip box or diamond shape with colored section to represent-



Health (blue)  
 Flammability (red)  
 Reactivity (yellow)  
 Personal Protection (white)



### ***NFPA Hazard Rating System***

The National Fire Protection Association (NFPA) system uses a diamond-shaped diagram of symbols and numbers to indicate the degree of hazard associated with a particular chemical or material. These diamond shaped symbols are placed on containers of chemicals or materials to identify the degree of hazard associated with the chemical or material. The diagram identifies three color-coded categories of hazard for each material. Each category is divided in levels of hazard potential with increasing numbers indicating increasing hazards. The abbreviated degrees of hazard in each of these categories are given as follows:

### ***Non-routine Tasks***

Tony Nichols a designee or the immediate supervisor of an employee performing a non-routine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed.

Special work permits are required for the performance of certain non-routine tasks, such as entry to confined spaces, breaking and opening piping systems, and welding and burning. For some special tasks, employees are required to follow special lockout/tagout procedures to ensure that all machinery motion has stopped and energy sources are isolated prior to and during the performance of such tasks.

### ***Contractors***

Prior to beginning work, Tony Nichols or designee will inform contractors with employees working on company property of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. We will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be

taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, we will advise contractors that they must comply with all Cal OSHA regulations while working on company property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

We will inform contractors of the workplace labeling system and the availability and location of SDS's for any chemical to which contractors' employees may be exposed while performing their work.

### ***Training Levels***

**First Responder Awareness level:** Individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release.

**First Responder Operations level:** Individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property or the environment from the effects of the release.

**Hazardous Materials Technician level:** Individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.

**Hazardous Materials Specialist level:** Individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician; however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with federal, state, local and other government authorities regarding site activities.

### ***Recordkeeping***

Records pertaining to the hazard communication program will be maintained by Tony Nichols or a designee as outlined in IIPP and as follows:

- Chemical inventory list.
- Hazardous material reviews.
- Copies of phone call logs and letters requesting SDS's.
- Employee training records.
- Warnings issued to employees for not following the Hazard Communication Program.

### ***Delivery/Transporting***

Each vehicle will carry SDS's appropriate for hazardous materials being transported. Drivers, like

all other employees, will receive hazard communication training when necessary.

***SDS Medical Use***










Employees who sustain a hazardous material injury or illness requiring medical treatment should be in possession of the appropriate SDS at the time of the first (emergency) medical treatment. The SDS provides useful treatment information and emergency phone numbers for treating physicians.





***Miscellaneous Contact Information***

Do not hesitate to contact The Drug and Poison Information Center if you have any questions, comments or in case of an emergency - nationwide 800 222-1222.



## HCS Pictograms and Hazards

<p><b>Health Hazard</b></p>  <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>	<p><b>Flame</b></p>  <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>	<p><b>Exclamation Mark</b></p>  <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><b>Gas Cylinder</b></p>  <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	<p><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><b>Exploding Bomb</b></p>  <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>
<p><b>Flame Over Circle</b></p>  <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<p><b>Environment (Non-Mandatory)</b></p>  <ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	<p><b>Skull and Crossbones</b></p>  <ul style="list-style-type: none"> <li>▪ Acute Toxicity (fatal or toxic)</li> </ul>

Acute Oral Toxicity - Annex 1					
	Category 1	Category 2	Category 3	Category 4	Category 5
LD <sub>50</sub>	£ 5 mg/kg	> 5 < 50 mg/kg	<sup>3</sup> 50 < 300 mg/kg	<sup>3</sup> 300 < 2000 mg/kg	<sup>3</sup> 2000 < 5000 mg/kg
<i>Pictogram</i>					No symbol
<i>Signal Word</i>	Danger	Danger	Danger	Warning	Warning
<i>Hazard Statement</i>	Fatal if swallowed	Fatal if swallowed	Toxic if swallowed	Harmful if swallowed	May be harmful if swallowed