PAGODA
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# Hazard Communication

## Purpose:

This Hazard Communication requires Pagoda Electrical, Inc. to provide information about the hazardous chemicals that employees will be exposed to, chemical product labels and other forms of warning, material safety data sheets related to the chemicals, appropriate training, and a written hazard communication program. Pagoda Electrical, Inc. will develop, implement, and maintain at each workplace, a written hazard communication program which at least describes how labels and other forms of warning, safety data sheets (SDS), and employee information and training will be maintained. The Safety and Health Manager has the specific responsibility for implementing the plan. Supervisors of employees have the responsibility to insure the Safety Plan is carried out. The Safety and Health Manager is also responsible for providing consultation and specific training is met when needed.

Supervisors who have employees who work in areas where hazardous chemicals are stored, handled or used are responsible for:

(1) creating and maintaining an inventory of all hazardous chemicals;
(2) ensuring proper labeling of all hazardous chemicals;
(3) acquiring and maintaining safety data sheets (SDS) for all hazardous chemicals located in the work area;
(4) informing employees of
    (i) any operations in their work area where hazards chemicals are present, and
    (ii) the location and availability of the written hazard communication program, the chemical inventory, and safety data sheets (SDS); and training employees about hazardous chemicals used in the work area.

## Procedures:

Hazardous Chemicals Inventory-
Job Foremen, or his/her designee, is required to maintain a list of all hazardous chemicals known to be present in each work area (e.g. shop area, section, etc.) and to update the list as necessary. This inventory list must identify each hazardous chemical by the primary name on the label AND the manufacturer or distributor of the chemical. The inventory list must be kept in the work area and accessible to

anyone requesting it. A 3-ring binder, CD-ROM and company website are available resources, clearly labeled "**HAZARDOUS CHEMICALS**.

This inventory shall list all hazardous chemicals found in the work area. This is to include:

(1) laboratory chemicals
(2) janitorial supplies
(3) compressed gases
(4) cleaning products
(5) materials found in the maintenance departments (such as lubricating oils, solvents, etc.)
(6) specialty chemicals used by ANYONE!

Labeling Requirements:

Supervisors must ensure that all hazardous chemicals in his/her area of responsibility are properly labeled. Labels should list at least the chemical identity, appropriate hazard warnings and the name and address of the manufacturer, importer or other responsible party. Portable containers of working solutions must be labeled appropriately unless they are intended for immediate use by the employee who prepares it. The contents of all vessels (containing chemicals or products such as cleaning solutions) must be identified by name on the container.

Chemicals that are manufactured by Pagoda Electrical, Inc. and distributed outside of the work center that it was manufactured in, will be labeled in accordance with the OSHA Hazard Communication Standard [29 CFR Part 1910.1200(f)(1-5)] if they contain hazardous chemicals in concentrations greater than one percent (or 0.1% for carcinogens). It is the responsibility of Pagoda Electrical, Inc. laboratory or manufacturing entity synthesizing the product to develop this label.

Chemicals stored in bulk quantities, pipelines, and storage tanks are required to be adequately labeled. Storage tanks or drums can be labeled collectively rather than labeling individual containers if they are not removed from the labeled area and if the hazards are the same. It is the responsibility of Pagoda Electrical, Inc. laboratory or manufacturing entity synthesizing the product to develop this label.

Pagoda Electrical, Inc. shall not remove or deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

Pagoda Electrical, Inc. shall ensure that labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Pagoda Electrical, Inc., if it has employees who speak other languages, ***will*** add the information in their language to the material presented, as long as the information is presented in English as well.

## Safety Data Sheets (SDS):

Supervisors are responsible for acquiring and updating material safety data sheets for all hazardous chemicals found in their work area. The material safety data sheets should be reviewed (before using the chemical), maintained and kept in the work area so that they are readily accessible to all.

To obtain specific material safety data sheets, the supervisor shall procure them from the Safety and Health Manager.

Only the most current SDS for a hazardous chemical from the same manufacturer will be kept on file. All Supervisors will check the date of all SDS's and use the most current one for each chemical, while discarding all other out of date SDS's. To obtain further information or assistance in interpreting Safety Data Sheets, contact the Safety and Health Manager.

A Safety Data Sheet must be developed and sent with those products that are synthesized by Pagoda Electrical, Inc., and distributed outside of the Centers in accordance with the OSHA Hazard Communication Standard [29 CFR Part 1910.1200(f)(1-5)] if they contain hazardous chemicals in concentrations greater than one percent (or 0.1% for carcinogens). It is the responsibility of Pagoda Electrical, Inc. laboratory synthesizing the product to develop and distribute the Safety Data Sheet.

## Employee Training and Information:

A. Training

It is the responsibility of Supervisors to recognize when training is needed for his/her employees and to arrange for such training. Supervisors are not responsible to provide any training (in the sense that he must develop and present the training program) but rather must recognize the need for training and arrange for his employees to receive it.

This training is available in several formats:

- •A presentation arranged or presented by the local Safety Committee
- •A video presentation from Pagoda Electrical, Inc. library
- •A presentation arranged or presented by the Safety and Health Manager or staff
- •A presentation arranged or presented by the Supervisor

Employees must be trained on the proper safeguards, safe use, and physical and health hazards of hazardous chemicals used on the job before beginning work with those chemicals or whenever a new hazardous chemical or procedure is introduced into their work area.

Also, it is recommended that employees receive annual training updates. Training will include at least the following topics:

- • Physical and health hazards of chemicals in the work area;
- • Methods and observation techniques used to detect the presence or release of a hazardous chemical;
- • How to lessen or prevent exposure to these hazardous chemicals through usage of controls, work practices and personal protective equipment;
- • How to use material safety data sheet information;
- • How to read and understand labels; and
- • Contingency plans for medical and chemical accident response.

All training shall be documented by recording the training session subject(s), date, attendees, and providing a copy of the outline for the training session. The Supervisor shall maintain these records and provide copies of all records to the Safety and Health Manager.

A completed hazardous chemical listing must be incorporated into Pagoda Electrical, Inc. Hazard Communication Program. This chemical listing can be found on page 10 of this manual, titled “SDS Master List”.

A. New Employees

Information about Pagoda Electrical, Inc.. Hazard Communication Program will be disseminated to all new employees in the Employee Safety Handbook (page 18). All new employees must be trained by their supervisor about hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into the work area.

## Non-routine Tasks:

Appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, Pagoda Electrical, Inc. will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical. Please refer to "Appendix A Labeling System Used" at the end of this chapter for examples of Pagoda Electrical, Inc. labeling systems.

Employees performing non-routine tasks can be exposed to chemicals from unusual and unsuspected sources. Written procedures shall be developed for every non-routine task by the supervisor of the employees who will perform the task. The information will include chemical hazards associated with the performance of the tasks and appropriate protective measures required to perform the task safely. The procedures shall be included in the local copy of the Hazard Communication Program. The Safety and Health Manager will provide advice and guidance upon request.

## Multi-employer workplaces.

If Pagoda Electrical, Inc. produces, uses, or stores hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed (for example, employees of a construction contractor working on-site), Pagoda Electrical, Inc. shall additionally ensure that the hazard communication programs developed and implemented under this paragraph include the following:

**a)** The methods Pagoda Electrical, Inc. will use to provide the other employer(s) on-site access to safety data sheets (SDS) for each hazardous chemical the other employer(s)' employees may be exposed to while working;

**b)** The methods Pagoda Electrical, Inc. will use to inform the other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies; and,

**c)** The methods Pagoda Electrical, Inc. will use to inform the other employer(s) of the labeling system used in the workplace.

Pagoda Electrical, Inc. may rely on an existing hazard communication program to comply with these requirements, provided that it meets the criteria established in this paragraph.

Pagoda Electrical, Inc. shall make the written hazard communication program available, upon request, to employees, their designated representativesin accordance with the requirements of 29 CFR 1910.1020 (e).

Where employees must travel between workplaces during a workshift, i.e., their work is carried out at more than one geographical location, the written hazard communication program may be kept at the primary workplace facility.

# Appendix A Labeling System Used by Pagoda Electrical, Inc.

Pagoda Electrical, Inc. may use words, pictures, symbols or any combination of these to communicate the hazards of the chemical. Employees will be trained and demonstrate a knowledge of the labeling system.

Poisonous/Toxic 

Corrosive 

Flammable Electric Shock Biohazardous

Pagoda Electrical, Inc. can also use several labeling systems common to the workplace. These include:

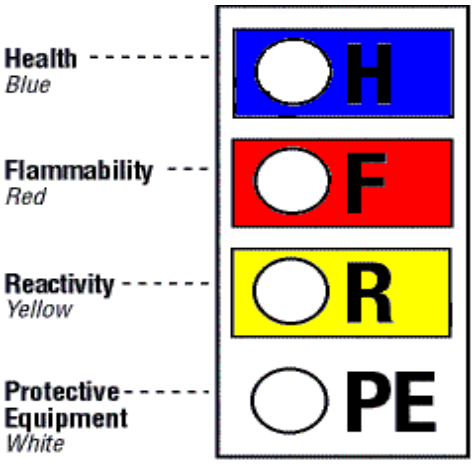
Right to Know (RTK)
National Fire Protection Association (NFPA) / National Fire Rating (NFR)
Hazardous Material Identification Guide (HMIG)
Hazardous Material Identification System (HMIS)

The Right to Know (RTK) labeling system consists of labels that list the chemical name, synonym or common name, hazard information, CAS (Chemical Abstract Service) number and precautionary measures and first aid procedures. (See below )


The National Fire Protection Association (NFPA) / National Fire Rating (NFR) labeling system employs a color-coded rating guide in a diamond shape. (See below). Health is defined by the color blue, Flammability is red and Instability is represented in yellow, Other or Corrosive in white. The numbers are assigned according to the level

of hazard the chemical(s) present 0-4. Thus 0 being no hazard and 4 the greatest level the greatest hazard


Hazardous Material Identification Guide (HMIG)labeling system presents a color formatted label and is rectangular in shape. The numbers used in this system to identify the hazard level of the chemical are based on the acute and chronic hazards present in normal day to day use in the workplace. (For example see below)




The numbers for the HMIG labeling systems can be obtained from MSDS sheets accompanying the chemical or reference books that list chemical hazards by number rating such as The Fire Protection Guide to Hazardous Materials as well as the National Fire Rating Guide.

Hazardous Material Identification System (HMIS)

Another common labeling system similar to the HMIG system is called HMIS III. It is It looks similar in nomenclature to the HMIG labeling system (using the color bar format and rectangular shape) and utilizes a rating system similar to the HMIG system. HMIS III refers to Hazardous Materials Identification System. The HMIS III rating system has recently been revised. The most significant change to the

label has been to the physical hazard section of the label. Along with the assigned number, an icon is now present: compressed gas, explosive, oxidizers, etc. This is to allow for easier identification of the presence of a specific hazard to the employee. (See an example below.)