



HAZARD COMMUNICATIONS PROGRAM

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Operating in California, Nevada, and Arizona

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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

Brett Padelford 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 on padelford.com/safety.

Proposition 65 List of Chemicals

Brett Padelford 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 online. Employees will be trained in the hazards of materials they use by their superintendent. If any new and significant health information is added to an SDS, or we receive a revised SDS, we will update the SDS website. We will also if necessary retrain the employees using this material.

Responsibilities

Brett Padelford 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 and 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 SDSs 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 SDSs
- Notifying the superintendent 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

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
- Signal word
- Hazard statement(s)
- Pictogram(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 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 SDSs
- 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

Non-routine Tasks

Brett Padelford and the immediate superintendent 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 superintendent 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, Brett Padelford 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 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 SDSs for any chemical to which contractors' employees may be exposed while performing their work.

Recordkeeping

Records pertaining to the hazard communication program will be maintained by Brett Padelford or a designee. The following records will be kept:

- Chemical inventory list
- Hazardous material reviews
- Copies of phone call logs and letters requesting SDSs
- 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.

GHS Pictograms and Hazard Classes – Employee Review		
		
<ul style="list-style-type: none"> ▪ Oxidizers 	<ul style="list-style-type: none"> ▪ Flammables ▪ Self Reactives ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Organic Peroxides 	<ul style="list-style-type: none"> ▪ Explosives ▪ Self Reactives ▪ Organic Peroxides
		
<ul style="list-style-type: none"> ▪ Acute toxicity (severe) 	<ul style="list-style-type: none"> ▪ Corrosives 	<ul style="list-style-type: none"> ▪ Gases Under Pressure
		
<ul style="list-style-type: none"> ▪ Carcinogen ▪ Respiratory Sensitizer ▪ Reproductive Toxicity ▪ Target Organ Toxicity ▪ Mutagenicity ▪ Aspiration Toxicity 	<ul style="list-style-type: none"> ▪ Environmental Toxicity 	<ul style="list-style-type: none"> ▪ Irritant ▪ Dermal Sensitizer ▪ Acute toxicity (harmful) ▪ Narcotic Effects ▪ Respiratory Tract ▪ Irritation

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

Transport "Pictograms" – Employee Review		
		
Flammable Liquid Flammable Gas Flammable Aerosol	Flammable solid Self-Reactive Substances	Pyrophorics (Spontaneously Combustible) Self-Heating Substances
		
Substances, which in contact with water, emit flammable gases (Dangerous When Wet)	Oxidizing Gases Oxidizing Liquids Oxidizing Solids	Explosive Divisions 1.1, 1.2, 1.3
		
Explosive Division 1.4	Explosive Division 1.5	Explosive Division 1.6
		
Compressed Gases	Acute Toxicity (Poison): Oral, Dermal, Inhalation	Corrosive
		
Marine Pollutant	Organic Peroxides	