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## SP 22 Hazard Communication

### 1.0 PURPOSE:

- 1.1 This policy defines the procedures for effectively communicating workplace hazards and control measures to all Kuesel Group employees who handle, use, or store hazardous materials. The policy establishes the written Hazard Communication Program required by OSHA (29 CFR 1910.1200).

### 2.0 SCOPE:

- 2.1 This program applies to all Kuesel Group personnel who use, handle, store, or may be exposed to hazardous chemicals.

### 3.0 RESPONSIBILITIES:

- 3.1 The **Hazard Communication Coordinator** (currently the Hazard Communication Coordinator is the Safety Representative) shall ensure compliance with this program by all employees.
- 3.2 The **Project Manager/Site Supervisor** shall ensure that all employees are familiar with any additional guidelines that are required of the Client or Jobsite.
- 3.3 The **Hazard Communication Coordinator and/or the Site Supervisor** is responsible for the following:
- 3.3.1 Implementing and maintaining this Hazard Communication Program at each Kuesel Group jobsite.
  - 3.3.2 Obtaining safety data sheets (SDS) and product specification literature for any new chemicals.
  - 3.3.3 Assisting employees in obtaining a copy of applicable SDS's when requested.
  - 3.3.4 Ensuring that all chemical containers are appropriately labeled, including transfer (secondary) containers.
  - 3.3.5 Provide specialized training on chemical hazards and additional training on new chemicals.
  - 3.3.6 Ensure chemicals are used in a proper manner and with appropriate exposure controls.
- 3.4 Each employee is responsible for complying with the guidelines as outlined in this document and any additional guidelines that are required of the Client or Jobsite.
- 3.5 The Hazard Communication Coordinator shall periodically evaluate this procedure for its
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effectiveness.

#### **4.0 GENERAL INFORMATION:**

##### **4.1 Chemical Inventory List**

- 4.1.1** A Chemical Inventory List that contains all the hazardous chemicals used by The Kuesel Group shall be maintained. This list can then be used as the SDS Manual Index.
- 4.1.2** This list shall include the common name or chemical name of the product and be arranged in a manner to facilitate the product's quick reference (ex. alphabetical order).
- 4.1.3** Additional information can also be put on this list, for example: Manufacturer name, product ID#, and locations of where the chemical can be found, etc.
- 4.1.4** After the chemical inventory list is compiled, it serves as a list of every chemical for which an SDS must be maintained. The Hazard Communication Coordinator (HCC) maintains a list of all chemicals used by The Kuesel Group.
- 4.1.5** The amount of each hazard chemical will also be maintained with the inventory.

##### **4.2 Safety Data Sheets(SDS) ( Formerly Material Safety Sheets(MSDS))**

- 4.2.1** SDS's are fact sheets for chemicals that pose a physical or health hazard in the workplace. SDS's provide employees with specific information on the chemicals they use. The manufacturer of the product provides the SDS and it must conform to the Globally Harmonized System (GHS) standard. The SDS will contain a standard format of 16 sections; each section identifies a single topic. As examples Section 4 will address first aid measures, Section 11 Toxicology and Section 14 Transportation information. The sections are not interchangeable. *See Appendix A for a list of SDS Sections.*
  - 4.2.2** A SDS shall be obtained for each chemical or chemical product listed on the Chemical Inventory List. The Site Supervisor shall maintain a master file of all SDS's for products used onsite and shall update the file as new or revised SDS's are obtained.
  - 4.2.3** Employees requesting the use of a new chemical product must obtain a SDS and any product specification literature (if available) before the product arrives onsite. In the event the new chemical product arrives onsite before the SDS is obtained, the product shall remain in its original packaging and be located in an area where damage will not occur until the SDS is received. SDS's can be obtained directly from the manufacturer or through the supplier or distributor.
  - 4.2.4** Copies of SDS's shall be maintained in a binder/manual at each Kuesel Group site. The Site Supervisor and/or Hazard Communication Coordinator shall be responsible for auditing SDS binder/manual on an annual basis.
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- 4.2.5 SDS's must be made readily available to employees without requiring permission from supervision. Employees shall be informed of the above SDS binder/manual location and the procedures for obtaining SDS's.
- 4.2.6 Upon request, whether verbal or written, a copy of the SDS shall be provided within two days after acknowledging the request.

## **5.0 JOBSITE REQUIREMENTS:**

- 5.1 It is the responsibility of The Kuesel Group, prior to the commencement of work, to provide the client and/or Jobsite representative with a workplace chemical list and the SDS's for all hazardous chemicals that The Kuesel Group anticipates bringing onto the property.
- 5.2 The Kuesel Group shall inform the client, Jobsite representative, and/or other Contractor employees when there is a potential for chemical exposure to non-Kuesel Group employees. This information includes any precautionary measures that need to be taken to protect these employees from The Kuesel Group's chemical products and any chemical labeling systems used by The Kuesel Group. Contractors will be provided ready access to the information at that particular site. The Jobsite Supervisor shall ensure that this exchange of information occurs before performing work activities that may result in non-Kuesel Group employee exposure.
- 5.3 The Kuesel Group shall account for the removal and/or disposal of all hazardous chemicals and waste at the conclusion of the contract.

## **6.0 LABELING REQUIREMENTS:**

- 6.1 Each container of hazardous chemicals/substances entering The Kuesel Group work areas must be labeled, tagged or marked by the manufacturer, importer, or distributor in accordance with GHS Chemical Labeling and Classification Standards. All deliveries of chemical containers shall be checked for the appropriate labels before accepting them.
  - 6.2 At a minimum, labels shall contain the following information:
    - 6.2.1 Product Identifier
    - 6.2.2 Signal Word
    - 6.2.3 Hazard Statement
    - 6.2.4 Pictogram(s)
    - 6.2.5 Precautionary Statement(s) and
    - 6.2.6 Name, address and phone number of manufacturer/importer/distributor
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- 6.3** Container labels shall not be removed, made illegible, or defaced.
- 6.4** Individual stationery containers of hazardous chemicals (tanks, drums, etc.) shall be labeled, tagged, or marked with the identity of the hazardous chemical and appropriate hazard warnings. This can be done by means of a sign, placard, or other such written materials in lieu of affixing labels to the process container.
- 6.5** Where a hazardous chemical is transferred into secondary containers (typically smaller containers) from a labeled container and is not completely used in the same shift by the person performing the transfer, the secondary container shall be labeled. The label shall contain the chemical or product identity and the appropriate hazard warnings. It is the responsibility of the user to identify and label these secondary containers.
- 6.6** The Kuesel Group currently uses the following labeling systems on secondary containers and other containers in which the name of the chemical and hazard warning information is not apparent or legible:
- 6.6.1** National Fire Protection Association (NFPA) labeling system (red, blue, yellow, white diamond shape label that contains numbers 0-4 in each colored section to communicate hazard information. The name of the chemical will also be on the label.)
- 6.6.2** Hazardous Material Information System (HMIS)(red, blue, yellow colored sections that contain numbers 0-4, to communicate hazard information and a section that has either letters or pictures to communicate PPE information and exposure hazards. The name of the chemical will also be on the label.)
- 6.6.3** Globally Harmonized System (GHS):
- 6.6.3.1** Pictograms. “They shall be in the shape of a square set at a point and shall include a black hazard symbol on a white background with a red frame sufficiently wide to be clearly visible.” Only one of the eight standard hazard symbols shall be in each pictogram, however more than one Pictogram may be applied. *Appendix B shows the Pictogram symbols.*
- 6.6.3.2** Signal Words. Single words will be used to indicate the relative level of severity of the hazard that alerts you to a potential hazard on the label. Only two words are used “Danger” and “Warning.” The word “Danger” is used for the more severe hazards and the word “Warning” is used for the less severe hazard. Only one of the single words may be used on the label.
- 6.6.3.3** Precautionary Statement. These statements describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage and handling. There are four accepted statements, prevention (to minimize exposure), response (in case
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of spillage or exposure emergency response and first aid), storage and disposal.

**6.6.3.4 Hazard Statement.** This statement will describe the nature of the hazard(s) of a chemical. For example “Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.” All applicable hazard statements must appear on the label.

**6.6.3.5** *A sample of the GHS label is provided in Appendix C.*

## **7.0 TRADE SECRET INFORMATION:**

- 7.1** Chemical manufacturers and importers may withhold specific chemical identity information from the SDS by claiming that it qualifies as a trade secret or confidential business information. The law states that this may be done provided that:
- 7.1.1** The chemical is not a carcinogen, a Teratogen (causes birth defects) or a substance that can induce abortion or sterility.
  - 7.1.2** The claim of a trade secret can be supported.
  - 7.1.3** Other information regarding the properties and effects of the hazardous chemical is disclosed.
  - 7.1.4** The SDS indicates that a trade secret is involved.
  - 7.1.5** The specific chemical identity information is made available to health professionals upon request.
- 7.2** Where a medical emergency exists, the Site Supervisor shall supply emergency or other telephone numbers to health professionals so they may obtain the necessary trade secret information directly by contacting the manufacturer. Telephone numbers are listed on the SDS, and in some cases, container labels.
- 7.3** The Site Supervisor shall coordinate any non-emergency requests for trade secret information.

## **8.0 NON-ROUTINE TASKS:**

- 8.1** Non-routine tasks are defined as working on, near, or with unlabeled piping, unlabeled containers of an unknown substance, confined space entry where a hazardous substance may be present and/or a one-time task using a hazardous substance differently from intended (example: using a solvent to remove stains from floors).
- 8.2** The Site Supervisor will evaluate all non-routine tasks before the task begins to determine all hazards present. The Site Supervisor shall obtain the necessary information from the Client. The client is responsible for providing safety and health information to The Kuesel Group
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employees engaged in non-routine tasks. This information can be conveyed through specific instructions on work orders, permits and/or through pre-job safety meetings.

**8.3** Once the hazard determination is made, the Site Supervisor will determine the necessary precautions needed to remove the hazard, change to a non-hazard, or protect from the hazard (ex. PPE). In addition, the Site Supervisor or Responsible Safety Representative will provide specific safety training for employees affected and will document the training.

**8.4** Work activities may sometimes be performed by employees in areas where materials are transferred through unlabeled pipes and/or are required to cut/open the pipe. Prior to starting work in these areas, if the material is unknown, the employee shall be trained on the following information:

**8.4.1** The material in the pipe;

**8.4.2** Potential hazards and safety precautions that should be taken.

## **9.0 TRAINING:**

**9.1** All employees shall be trained initially and prior to assignment of any work with hazardous chemicals. Transferred employees shall be provided with additional training when they will be handling hazardous chemicals under new conditions or handling new hazardous chemicals.

**9.2** Hazard Communication Training is provided to all employees during annual safety training.

**9.3** Employees shall be provided additional training whenever:

**9.3.1** A new hazardous chemical or chemical product is introduced into their work area, or

**9.3.2** New information is obtained on existing chemicals with regard to the hazard, precautionary measures, exposure conditions, etc.

**9.3.3** Employee demonstrates a lack of understanding, when working with hazardous chemicals.

**9.4** The Project Manager or Site Supervisor shall provide Hazard Communication training covering the requirements of this procedure to all new employees and when additional training is needed. Special provisions will be made to ensure understanding when an employee does not speak English (ex. interpreter, non-English labels, etc.)

**9.5** Chemical specific training information shall be provided by the Project Manager or Site Supervisor to all new employees, transferred employees, and when new hazardous chemicals are introduced into the work area. This training shall include:

**9.5.1** A review of the chemical's SDS.

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- 9.5.2 Location of hazardous chemicals in the workplace and/or any operations employees may be assigned where hazardous chemicals are present
- 9.5.3 Methods of detecting the presence or release of a hazardous chemical
- 9.5.4 Information regarding hazards on non-routine tasks and hazards of chemicals contained in unlabeled pipes, where applicable
- 9.5.5 Precautionary measures to protect against hazards. These include specific work practices, engineering control methods, personal protective equipment, and emergency procedures.
- 9.6 Training shall be done on a hazard category basis, on a generic chemical class basis, or on a chemical-by-chemical basis, as appropriate for the jobsite or work area.

**10.0 DOCUMENTATION:**

- 10.1 Training records shall be kept for each new employee as well as when additional Hazard Communication training sessions have been conducted. Records shall be kept with the Project Manager/Site Supervisor.
- 10.2 Training can be conducted as part of their new hire orientation training, toolbox talks, and/or safety meetings.
- 10.3 The Project Manager/Site Supervisor shall maintain employee written requests for SDS copies.










**11.0 REVISION REGISTER:**

Date	Description of Change	Page No.	Initials


<b>THE KUESEL GROUP</b>	<b><i>Hazard Communication – Appendix A: Global Harmonizing System (GHS) Safety Data Sheet (SDS)</i></b>	Procedure No.: <b>SP-22</b> Revision No.: Date: <b>Nov. 2018</b> Page: <b>184 of 558</b>
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Manufacturers or distributors will be required to provide (SDS) that provides a standard format of information related to that particular chemical. The standard sections are provided below.

Section 1	Chemical identification & company information
Section 2	Hazard Information
Section 3	Information on ingredients
Section 4	First Aid measures
Section 5	Firefighting measures
Section 6	Accidental release measures
Section 7	Handling and storage
Section 8	Exposure controls/personal protection
Section 9	Physical and chemical properties
Section 10	Stability and reactivity
Section 11	Toxicology information
Section 12	Ecology information
Section 13	Disposal considerations
Section 14	Transport information
Section 15	Regulatory information
Section 16	Other information

<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 (harmful)</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>Explosing Bomb</b></p>  <ul style="list-style-type: none"> <li>• Explosives</li> <li>• <u>Self-Reactives</u></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>

**SAMPLE LABEL**

<p style="text-align: center;"><b>PRODUCT IDENTIFIER</b></p> <p>CODE _____ Product Name _____</p> <p style="text-align: center;"><b>SUPPLIER IDENTIFICATION</b></p> <p>Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____</p> <p style="text-align: center;"><b>PRECAUTIONARY STATEMENTS</b></p> <p>Keep container tightly closed. Store in cool, well ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measure against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear Protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Disposae of in accordance with local, regional, national, international regulations as specified.</p> <p><b>In Case of Fire:</b> use dry chemical (BC) or Carbon dioxide (CO<sub>2</sub>) fire extinguisher to extinguish.</p> <p><b>First Aid</b> If exposed call Poison Center. If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.</p>	<p style="text-align: center;"><b>HAZARD PICTOGRAMS</b></p> <div style="text-align: center;"></div> <p style="text-align: center;"><b>SIGNAL WORD</b> <b>Danger</b></p> <p style="text-align: center;"><b>HAZARD STATEMENT</b></p> <p><b>Highly flammable liquid and vapor. May cause liver and kidney damage.</b></p> <p style="text-align: center;"><b>SUPPLEMENTAL INFORMATION</b></p> <p><b>Directions for use</b></p> <p>_____ _____ _____</p> <p>Fill weight: _____ Lot Number _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____</p>
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