



Hazard Communication Program

EMA is complying with the requirements of OSHA's Hazard Communication Standard, Found in 29 CFR 1910.1200, by compiling a list of hazardous chemicals, using MSDS's to provide information on those hazardous chemicals, ensuring that containers are labeled, and providing formal training to our workers. In addition, we provide this same information to subcontractors involved with specific projects, so that they may provide this information and train their employees.

This program applies to all work operations in our company where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

The Project Manager, or his designee, acting as the representative of EMA, has overall responsibility for the program. The Project Manager will review and update the program, as necessary. Copies of the written program may be obtained at our corporate office.

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable MSDS's, and chemical information lists from the Project Manager. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. Our employees will also be informed of the hazards associated with non routine tasks that may expose them to hazardous chemicals.

If after reading this program, you find that improvements can be made, please contact the Project Manager. We encourage all suggestions because we are committed to the success of our written hazard communication program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Hazard Evaluation Procedures

Our chemical inventory is a list of hazardous chemicals known to be present in our workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facility.

The Project Manager, keeps the chemical inventory list and information needed to acquire MSDS's used in our facility, in our written Hazard Communication at our corporate office. The inventory is evaluated for completeness annually.

After the chemical inventory is compiled, it serves as a list of every chemical for which an MSDS must be maintained.

Material Safety Data Sheets (MSDS's)

The MSDS's we use are fact sheets for chemicals which pose a physical or health hazard in the workplace. MSDS's provide our employees with specific information on the chemicals they use.

The Project Manager is responsible for obtaining/maintaining the MSDS's for chemicals our employees may be exposed to occupationally. He/she will contact the chemical manufacturer or vendor if additional research is necessary to obtain a copy of the MSDS.

The material safety data sheets are kept in our safety and health manual with our chemical listings. We maintain and have readily accessible copies of MSDS's for each hazardous chemical that we maintain in the workplace. To acquire MSDS's our employees simply need to call the distributor with the product name, manufacturer, and any other pertinent data on the product, such as size and form (liquid, aerosol, paste, etc.). The distributor will then promptly fax or provide the data to the employee at a provided fax number or in person.

EMA's employees perform duties in many different locations and construction sites, which may include chemicals that are not in our chemical listings. In the event of an emergency, EMA's employees will contact the 3E Company to obtain MSDS's for such chemicals. To acquire MSDS's our employees simply need to call the 3E company **(1-800-360-3220)** with the product name, manufacturer, and any other pertinent data on the product, such as size and form (liquid, aerosol, paste, etc.). The 3E company will then promptly fax the data to the employee at a provided fax number.

Employees are trained in the use, afforded access, and encouraged to acquire MSDS's. Our employees are informed "Read it, before you need it!". An inventory of the chemicals is attached to this program for reference.

The procedures followed if the MSDS is not received at time of first shipment is to immediately call the vendor or manufacturer and inform them of our need for our MSDS's. If we are unable to obtain the MSDS for the new shipment, it will not be allowed to be used until it is acquired and employees are educated on the hazards associated with the new chemical.

Labels and Other Forms of Warning

Labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The chemical identity is found on the label, the MSDS, and the chemical inventory. Therefore, the chemical identity links these three sources of information. The chemical identity used by the supplier may be a common or trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage"). Labels frequently contain other information, such as precautionary measures (i.e., "do not use near open flame"), but this information is provided voluntarily and is not required by the rule. Our labels are legible and prominently displayed, though their sizes and colors can vary.

The Project Manager is responsible for ensuring that all hazardous chemicals in containers are properly labeled and updated, as necessary. He also ensures that newly purchased materials are checked for labels prior to use and is responsible for ensuring the proper labeling of any shipped containers.

If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container.

Training

Everyone who works with or is potentially "exposed" to hazardous chemicals will receive initial

training, and any necessary retraining on the Hazard Communication Standard, and on the safe use of those hazardous chemicals. This training is provided by the Project Manager or a competent outside source.

"Exposure" means that "an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure." Whenever a new hazard is introduced, an old hazard changes, or hazards of non-routine tasks present themselves, additional training is provided for the chemical hazard with the MSDS.

Information and training is a critical part of the hazard communication program. We train our employees to read and understand the information on labels and MSDS's, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.

Our goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use labels and MSDS's, and appropriately following the protective measures we have established. Additionally, if we have employees which are non-English speaking, information is provided in their language. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

All "exposed" employees receive training for hazard communication.

Training Content

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to MSDS information and what it means.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

The procedure to train new employees at the time of their initial assignment is to conduct Hazard Communication Training utilizing instructional strategies consisting of: lecture, videos, slides, booklets, and/or our written program. Upon completion of the training the employee is evaluated to assure that he/she has assimilated the course objectives. We further will train employees when a new hazard is introduced by new chemicals in the workplace.

Certificates are signed upon completion of their training and are kept at the corporate office.

Multi-Employer Facility

When contractors or any other employers' workers (i.e., painters, electricians, or plumbers) will be working at our facility, The Project Manager will:

- Exchange with other employer(s) the MSDS's, or means to acquire MSDS's, for any chemicals to which the employees may be exposed to.
- Relay necessary label and/or emergency precautionary information to the other employer(s).

Each contractor bringing chemicals on-site must provide the Project Manager with the appropriate hazard information on these substances, including the MSDS's, the labels used and the precautionary measures to be taken in working with these chemicals.

Additional Information

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable MSDS's, and chemical information lists from the Project Manager or our corporate office.