



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 1 of 8

1.0 PURPOSE

The purpose of this section is to ensure the safety and health of employees and to be in compliance with Title 29 Code of Federal Regulations 1910.1200, by:

1. Compiling a list of potentially hazardous materials;
2. Using material safety data sheets (SDS's);
3. Ensuring that containers are labeled; and
4. Providing employee training.

2.0 SCOPE

This section applies to all work operations at PPP where a person may be exposed to hazardous substances under normal working conditions or during an emergency situation.

Under this program, employees will be informed of:

1. The contents of the Hazard Communication Standard;
2. The hazardous properties of chemicals with which they work;
3. Safe handling procedures or measures to be taken to protect employees from chemicals; and
4. Hazards associated with non-routine tasks.

3.0 INDEX TO SECTION

- 1.0 Purpose
- 2.0 Scope
- 3.0 Index to Section
- 4.0 Overview
- 5.0 Hazardous Materials Inventory
- 6.0 Labeling
- 7.0 Material Safety Data Sheets
- 8.0 Training
- 9.0 Subcontractors
- 10.0 Multi - Employer Jobsites
- 11.0 Related Forms



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 2 of 8

4.0 OVERVIEW

The program coordinator is the PPP safety director, who acts as the representative of the PPP president and CEO who has overall responsibility for the program. The safety director will review and update the program as changes in chemical usage occur or as otherwise necessary.

A copy of the Haz-Com Program is located on every PPP jobsite and may be obtained from the project supervisor, the project safety coordinator or the safety director. The program is also included in the PPP Craft Employee Orientation Manual, which every craft employee receives, and acknowledges receipt of, at the start of employment with the company.

All employees, or their designated representatives, can obtain further information on this haz-com program, the Hazard Communication Standard, applicable SDS's and hazardous material inventories from the PPP safety director.

5.0 HAZARDOUS MATERIALS INVENTORY

The safety director has compiled a list of potentially hazardous materials most typically used by company employees, and applied it to PPP Form S.HMI.1 Hazardous Materials Inventory (attached to this section).

Project supervisors shall be responsible to:

1. Perform hazardous materials inventories relative to their projects, utilizing Form S.HMI.1 and filling in the appropriate blank spaces;
2. Update the inventory by adding any potentially hazardous materials employees under their authority may be using, or are exposed to, that are not already on the list; and
3. Maintain the inventory list where it will be accessible to site employees, government inspectors or other affected parties.



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 3 of 8

6.0 LABELING

The PPP tool Manager and/or Site Supervisor are responsible for ensuring that all jobsite containers and shipped containers of chemicals that belong to PPP are properly labeled. All labels will be in English, easy to read and prominently displayed. [However, for non-English speaking employees, information shall be presented in their language as well.](#) Each label will include:

1. A product identifier
2. A signal word
3. One or more pictograms
4. Hazard statements
5. Precautionary statements
6. The name address and telephone number of the chemical manufacturer, importer or other responsible party.

The chemical containers will be inspected on a regular basis by the PPP tool Manager and/or Site Supervisor to ensure that they are properly labeled and that the labels are current and legible. [Employer or employees shall not remove or deface labels on incoming containers of hazardous chemicals.](#) Containers with labels that have been removed or defaced will be immediately removed from the work area until a proper label is securely attached to the container.

The corresponding SDS shall be referenced to assist in verifying label information.

When a chemical is transferred into a secondary container, the container will be properly labeled unless the contents are to be used immediately and completely, the PPP tool Manager and/or Site Supervisor will immediately revise the label of any chemical whenever they become aware of any significant information changes that affect hazard communication.

The PPP tool manager shall ensure proper labeling of portable containers of chemicals being shipped from the shop/warehouse facilities to jobsites.

Project supervisors shall ensure proper labeling of portable containers of chemicals being used on their jobsites

[Product identifier and 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](#)



**COMPANY
HEALTH & SAFETY
PROGRAM**










Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 4 of 8

[employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.](#)

GHS Pictograms and Hazard Classes		
 <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



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 5 of 8

7.0 SAFETY DATA SHEETS

Safety data sheets (SDS's) provide specific information on chemicals employees may be exposed to. The PPP safety director maintains SDS's for substances used in our work. These SDS's are readily available to all employees at the Plymouth, Michigan facilities.

The safety director issues to project supervisors a condensed set of SDS's which includes SDS's for materials *typically* used and listed on the Hazardous Materials Inventory.

Project supervisors shall add SDS's to their set for any site-specific materials that are added to their Hazardous Materials Inventory.

Project SDS's shall be readily available to site employees during all shifts.

Project supervisors shall notify the safety director if they incur problems obtaining a SDS, and the safety director will assist.

8.0 TRAINING

The supervisor conducting orientation for employees at the onset of their employment with PPP shall ensure that employees receive, understand and document acceptance of the PPP Craft Employee Orientation Manual. The manual contains the PPP Hazard Communication Program.

1. Additional training includes:

- a. The Weekly Site Employee Safety Meeting, where at least annually the primary topic is Hazard Communication;
- b. Training as mandated by Section No. 37, Safety Planning; and will include information and requirement for the New Globally Harmonized System of Hazard Communication and Labeling.
- c. Review of a pertinent SDS as part of the Weekly Site Employee Safety Meeting; and



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 6 of 8

- d. Special hazard awareness training coordinated by the safety director when PPP employees may be exposed to known hazardous chemicals, such as asbestos, benzene or lead.
2. Training shall emphasize the following:
 - a. Summary of the standard and this haz-com program;
 - b. Chemical and physical properties of hazardous materials, and methods that can be used to detect the presence or release of chemicals (including in unlabeled pipes);
 - c. Physical hazards of chemicals (e.g., potential of fire, explosion, etc.);
 - d. Health hazards associated with exposure to chemicals, including signs and symptoms, and any medical condition known to be aggravated by exposure to a chemical;
 - e. Procedures to protect against hazards (e.g., personal protective equipment required, proper use and maintenance, work practices or methods to assure proper use and handling of chemicals and procedures for emergency response);
 - f. Procedures to follow in the event of a chemical spill or leak; and
 - g. Where SDS's are located, how to read and interpret information on labels and SDS's and how employees may obtain additional hazard information.

The safety director will periodically review the employee training program and advise the PPP president/CEO on training or retraining needs. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace.

As part of the assessment of the training program the safety director shall obtain input from employees regarding the training they have received and their suggestions for improving it.

When required to perform hazardous non-routine tasks such as entering a confined space, a special training session shall be conducted to inform employees of the hazards they might be exposed to and the proper precautions to take.



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 7 of 8

9.0 SUBCONTRACTORS

PPP subcontractors shall be advised by the PPP project manager or the safety director of any chemical hazards that may be encountered in the normal execution of their contract on our jobsites, the labeling system in use, protective measures to be taken and safe handling procedures to be used. Subcontractors shall be notified of the availability and location of SDS's.

Each subcontractor bringing chemicals onto a jobsite must provide PPP with appropriate hazard information regarding the substances. Hazard information shall include labels used and precautionary measures to be taken when working with or around these chemicals.

10.0 MULTI - EMPLOYER JOBSITES

Because the owner or host employer has overall responsibility for the safety and health of all employees on a jobsite, hazard information shall be submitted to the host employer for substances to be used by PPP and our subcontractors.

It is expected that hazard information for substances to be used by other site contractors will be communicated to PPP and our subcontractors, so adequate safeguards may be implemented to protect employees.

The PPP Haz-Com Program and applicable SDS's will be made available to all contractors on jobsites at their request.

11.0 RELATED FORMS

Please find attached Form [S.HMI.1 – Hazardous Materials Inventory](#) with materials listed that are **typically** used by PPP employees.

It is intended that these forms be copied as needed and replaced, not permanently removed from the binder.



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev: 4
Date: 11/15/17
Authorized: *MJM*

Title: Hazard Communication Program

Section No: 18

Page 8 of 8

REVISION HISTORY

Revision number	Description of change	Written by	Checked by	Effective date
1	Revised to meet current standards	George Newton	Safety	1/6/2011
	Program reviewed and Revision History added		GMN	4/15/2014
2	Revised to add globally Harmonized system of Hazard Communication training	George Newton		10/20/2014
3	Revised Section 6.0 Labeling requirements	George Newton		3/16/2015
4	Revised to meet current standards	Mike McCaffrey	MJM	11/15/17