PURPOSE

The purpose of this program is to communicate to employees and visitors the occupational exposures and safeguards of hazardous chemicals in the workplace.

1. GENERAL INFORMATION
2. The Company will rely on the evaluation performed by chemical manufacturers and importers regarding specific chemical identity and the hazards associated with that chemical.
3. The Company will consider a chemical or solid, a physical hazard, based upon scientific study, if it is a combustible liquid, a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable, or water reactive.
4. CHEMICAL INVENTORY
5. The Company shall maintain an inventory of all known chemicals (liquid, solid or gas) by using an identity that is referenced on the appropriate Safety Data Sheet. The Company will keep this inventory current with regard to purchases, use and on-hand storage of chemicals and will make such listing available and accessible to employees and others who wish to resource it.
6. Any sub-contractor used by the Company will be required to supply Safety Data Sheets for respective chemicals brought to the job site by their employees. The Company will add such chemicals to its own listing prior to presenting it to the customer representative.
7. The Company will add newly acquired chemicals to its existing inventory list while deleting those no longer in use by the Company.
8. The chemical inventory listing will be evaluated at least annually.
9. CONTAINER LABELING
10. Company personnel will ensure that each shipment of chemicals delivered displays proper labeling, or it will not be accepted. Labeling shall be in English, and in such instances as an employee of the Company does not speak or understand the English language; efforts will be made by the Company to have such applicable documents communicated to the employee in the language of his origin. When the employee is that of the customer or other contractor, the Company shall reasonably expect such customer or contractor to assist in providing such accommodations.
11. All chemicals employees will use, except for small amounts placed in other containers(s) for immediate use, will be labeled. No unmarked container of any size will be left in the work area unattended. Chemicals designated for immediate use should be returned to the original container when the employee is finished with its use. Chemicals that will remain in the container for subsequent work periods will result in the container being labeled for that particular chemical, and then only that chemical will be placed into that container until it is properly disposed of.
12. The Company will rely on manufacturer applied labels whenever possible, and will ensure that these labels are maintained. Containers where the contents are known and which display no label, or on which the manufacturer’s label has been removed, will be re-labeled either by writing directly onto the container with a weather-resistant marker or applying an adhesive label for proper identification.
13. Employees are strictly prohibited from dispensing chemicals from an unknown container into another container for immediate use. Additionally, the Company will require all contractors to restrict its employee from exercising the same practice while on customer property.
14. In accordance with OSHA requirements, the Company will require that each container of hazardous chemicals or other hazardous substances in the workplace, be marked, tagged, or labeled with the following:
* Product identifier; signal word; hazard statement(s); pictogram(s); precautionary statement(s); and name, address, and telephone number of the chemical manufacturer, importer or other responsible party.
1. Containers found in the workplace which does not display appropriate hazard warnings or labels, will be marked “Do Not Use until Properly Labeled”, by the employee. Such container will then be isolated to prevent the inadvertent use of its contents by an unsuspecting employee.
2. When shipping any container or piece of equipment, the person who signs the shipping papers is responsible for ensuring that the container is properly labeled and clearly marked.
3. The HSE Manager will conduct periodic inspections to ensure that the use & care of labels and other forms of warnings are not defaced or removed. The information on labels may differ from manufacturer to manufacturer, but all labels should provide the following information, at a minimum, prior to acceptance into the warehouse or on a temporary job site:
4. Chemical Name;
5. Health Hazards;
6. Physical hazard;
7. Reactivity;
8. SAFETY DATA SHEETS (SDS)
9. Chemical manufacturers are responsible for developing SDSs. The Company shall have a SDS for each chemical used. Should a container arrive to the Company or a temporary job site without the SDS, the Purchasing Agent will contact the respective manufacturer or distributor to request appropriate Safety Data Sheets.
10. SDSs can be maintained at the primary work site, but shall also be readily accessible in each work area in case of an emergency. SDS must be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director.
11. The Company will consider an SDS acceptable when it contains the following information, at a minimum:
12. The chemical and common name(s) of all ingredients, which make up the chemical or other hazardous substance.
13. Physical and chemical characteristics of the hazardous chemical (such as vapor pressure and flashpoint).
14. The physical hazards of the hazardous chemical including the potential for fire, explosion and reactivity.
15. The health hazards of the hazardous chemical including signs and symptoms of exposure, and any medical condition which is generally recognized as being aggravated by exposure to the chemical.
16. The primary routes of exposure.
17. The OSHA permissible exposure limit.
18. Whether the chemical or substance is a potential carcinogen.
19. Applicable precautions for safe handling and use, as known by the chemical manufacturer, importer, employer of chemist who mixed the solution and what to do if chemical is spilled.
20. Control measures for safe use, such as appropriate safe work practices, engineering controls, and personal protective equipment.
21. Emergency and first aid procedures.
22. The date of preparation of the Safety Data Sheet, or the last change made to it.
23. The name, address and telephone number of the chemical manufacturer or importer.
24. EMERGENCY ACTIONS
25. Employees, who witness or are involved in an overexposure incident or exposure to any hazardous substance in the workplace, should notify the following:
26. The HSE Manager,
27. The Customer Representative, and
28. The local emergency response telephone number
29. When an employee has chemicals introduced into the eyes, he/she must be taken to an eye wash station immediately and should rinse both eyes with clean running water for at least 15 minutes.
30. An employee who has skin exposure should flush the affected area with clean running water for at least 15 minutes.
31. Employees who are conscious and have been exposed to a chemical or other hazardous substance should be taken immediately to a source of clean fresh air/water.
32. Administering personnel should make every attempt to keep an unconscious employee’s airway open, and “Rescue Breathing” should be started for the employee until normal respiration begins or trained medical personnel arrive.
33. Supervisory personnel should always have assembly areas designated so as to take head count of all individuals in the work crew, in the event of an emergency.
34. COMMUNICATION OF HAZARDS
35. The Company will communicate, via postings and through verbal instructions, any special or non-routine task being performed on Company property and/or on temporary job sites that might expose employees to chemical hazards contained in unlabeled containers and vessels.
36. Consult with process operators when on temporary job sites, in order to obtain specific information concerning process hazards. Such information may be related to:
37. Applicable Lockout/Tagout provisions (29 CFR 1910.147),
38. Operating temperatures on equipment and surrounding piping systems (29 CFR 1910.119),
39. Facility emergency actions and alarms (29 CFR 1910.38),
40. Required personal protective equipment for the area (29 CFR 1910.132), and
41. Valves, switches and other controls, which are “off limits” to outside personnel (29 CFR 1910.119).
42. MANAGEMENT RESPONSIBILITIES
43. The HSE Manager & Program Administrator will have the responsibility of ensuring that an effective written hazard communication program is maintained and introduce to employees and others who will be affected by the Company’s work activities. Copies of the Company’s hazard communication program shall be maintained at each workplace that describes methods of providing information & warnings to employees, precautionary measures to be taken, Safety Data Sheets, & information on labeling systems.
44. In addition, the Company shall make available, upon request, a copy of its’ written hazard communication program to employees, their designated representatives, the Assistant Secretary & the Director in accordance with requirements of 29 CFR 1910.1020(e). When employees must travel between work places during a work shift (multi job sites), the written program will be kept at a primary job site.
45. The Company also will have the additional responsibility to ensure that the program is current and that all information is communicated to employees on a consistent basis.
46. The Company will ensure that employees have the appropriate personal protective equipment required to protect the employee from known hazards, supplied at no cost to the employee.
47. EMPLOYEE RESPONSIBILITIES
48. Employees have the responsibility to learn and understand the provisions of the Company’s “Hazard Communication Program”.
49. Employees should understand how to access the resource materials safety data sheets (SDS), and should know how to seek help for clarification when necessary.
50. Employees should understand the Company’s labeling requirements as well as its policy concerning the use and storage of chemicals.
51. Employees are responsible for evaluating their respective work areas and obtaining a real familiarity with the location of fixed obstructions, which can be potential lower leg, and above head hazards.
52. Supervisory personnel are to complete a Job Safety Analysis Report (JSA) prior to the start of each and every temporary job site activity. For the purpose of this policy, the Company will consider the JSA as the primary hazard communication instrument the supervisor can use while on the job site. JSA’s are to be submitted immediately upon job completion.
53. Employees are responsible for conducting themselves professionally, and in a manner indicative of someone who has concern for the safety not only of themselves, but also of others. Behavior detrimental to the overall safe completion of any Company-authorized activity will result in the individual’s immediate removal from the job site, and subsequent disciplinary action.
54. New employees have the responsibility for maintaining a close and inquisitive relationship with supervisory personnel and other more experienced employees. The first few days of an employee’s employment will be critical to the overall safety efforts of the Company and to the employee’s acclimatization to prescribed work procedures.
55. All employees are responsible for reviewing Station Bills on offshore rigs/crew boats, and becoming familiar with their respective roles and assignments in emergency situations. Employees are to be orientated to the elements of the respective customer’s Safety Manual, prior to deployment. A signed acknowledgement shall be filed on each employee who has received this orientation.
56. EMPLOYEE TRAINING
57. To ensure that employees participate in an effective training program, the Company will provide new hires and existing employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area.
58. The following topics will be covered, at a minimum:
59. An explanation of the requirements contained in the Hazard Communication Standard (29 CFR 1910.1200);
60. Operational training specific to their work area where hazardous chemicals are present;
61. Location and availability of the Company’s written program;
62. Physical and health effects of hazardous chemicals;
63. Chemical Hazard Categories:
* Explosives,
* Gases,
* Flammable Liquids,
* Flammable Solids,
* Oxidizers,
* Organic Peroxides,
* Poisons,
* Corrosives
* Miscellaneous
1. Additional Chemical Hazards:
* Hepatotoxins (i.e., Carbon tetrachloride & Nitrosamines)
* Nephrotoxins (i.e., Halogenated Hydrocarbons)
* Neurotoxins (i.e., Mercury & Carbon Disulfide)
* Agents That Act On Blood (i.e., Carbon Monoxide & Cyanides)
* Agents That Damage the Lungs (i.e., Silica & Asbestos)
* Reproductive Toxins (i.e., Lead)
* Cutaneous Hazards (i.e., Ketones & Chlorinated Compounds)
* Eye Hazards (i.e., Organic Solvents & Acids)
* Carcinogens (i.e., Cancer Causing Chemicals)
* Irritants (i.e., Chemicals That Cause Reversible or Inflammatory Effect)
* Sensitizers (i.e., Chemicals that Cause Allergic Reactions)
1. Use of engineering controls, appropriate work practices and protective measures to be utilized to prevent exposure;
2. How to address exposure incidents and emergencies;
3. Location and availability of SDS, and how to read and understand SDSs;
4. Details of the hazard communication program including the use, handling and storage of Hazardous Materials;
5. Danger of confined and enclosed spaces;
6. Proper PPE to be used; and
7. Explanation of the labeling system.
8. RECORDKEEPING

The Company will maintain all records pertaining to this program including:

1. Employee Training Records: Duration of employment plus three (3) years;
2. Job Safety Analysis Reports (JSA’s): Not less than three (3) years;
3. Safety Meeting Records: Not less than three (3) years;
4. Safety Data Sheets (SDS) for current chemicals in use; and
5. Injury Reports: Not less than fifteen (15) years.

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| **Reviewed and Approved** |
| Quality Manager or President |   |   |
|   | Date |