15.1 Policy Statement

The purpose of the OSHA Hazard Communication Standard (HCS) is to ensure that the hazards of all produced or incorporated chemicals are evaluated and the information concerning these hazards is transmitted to both employers and employees. The standard also uses the Globally Harmonized System (GHS) for container labeling and safety data sheets. This is an international approach to hazard communication, providing agreed criteria for classification of chemical hazards, and a standardized approach to labeling and safety data sheets.

The standard mandates the evaluation of hazardous chemicals present in a workplace and requires training of employees regarding the hazardous chemicals and related prevention and protective measures for routine and non-routine tasks. It should be noted that all references to Material Safety Data Sheets (MSDS) have been replaced by Safety Data Sheets (SDS); in terms of this plan, MSDS and SDS are interchangeable until all such sheets are in the SDS format.

15.2 Definitions

- **Article:** A manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.
- **Chemical:** Any substance, or mixture of substances.
- **Chemical Manufacturer:** An employer with a workplace where chemical(s) are produced for use or distribution.
- **Container:** any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
- **Employee:** A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non- routine, isolated instances are not covered.
- **Employer:** A person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.
- **Exposure or exposed:** An employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)

- **Foreseeable Emergency:** Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.
- **Hazardous Chemical:** means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiate, combustible dust, pyrophoric gas, or hazard not otherwise classified.
- **Immediate Use:** The hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- **Label:** An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.
- **Pictogram**: A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Nine pictograms are designated under this standard for application to a hazard category.
- **Safety Data Sheet (SDS)**: a detailed document provided by a chemical manufacturer that outlines the hazards of a particular substance, including information on its physical properties, toxicity, handling procedures, storage guidelines, and emergency response actions in case of exposure or spill
- **Work Area:** A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.
- **Workplace**: An establishment, job site, or project, at one geographical location containing one or more work areas.

15.3 Hazard Communication Plan

- The ASMG Hazard Communication Plan (HCP) consists of **four major components:**
  - Identification and inventory of all hazardous chemicals and listing on a Hazardous Chemical List (HCL).
  - Acquisition of Safety Data Sheets (SDS - formerly MSDS) for each hazardous chemical listed on the HCL.
  - Labeling of primary hazardous chemical containers with chemical name, hazards and warnings and the manufacturers or importers name and address, with reference to the appropriate Safety Data Sheet. Secondary containers require the chemical name and summarized hazard information.
  - Training of all employees about the hazardous chemicals in the workplace and of the Hazard Communication Plan.

- **The Safety Manager** is the coordinator for the Hazard Communication Plan for All States Materials Group and shall have overall control of the Hazard Communication Program.
  - Copies of the Hazard Communication Standard and the Hazard Communication Plan shall be available at each permanent site, Construction Supervisors, and/or job trailers.

15.4 Duties

- **Supervisor Responsibilities:** Each supervisor is responsible for assuring that each container of a hazardous chemical is properly labeled in accordance with this program.
  - They shall also ensure that each employee under their direction has been effectively trained in the use, proper protective measures, first aid procedures, storage procedures, etc. as outlined in the SDS for each hazardous chemical used.
  - They shall ensure that the chemicals they are responsible for have been properly stored.
- **Employee Responsibilities:** Each employee is responsible for the proper use and storage of hazardous chemicals. Employees are not to use a hazardous chemical they have not been adequately trained to use.
  - They are to contact their supervisor immediately if they find a suspected chemical that is not labeled properly.
  - They are to immediately contact their supervisor if they witness a spill or release of a hazardous chemical.
  - If any employee transfers a hazardous chemical from its original container to another unmarked container, they must comply with the labeling requirements detailed in section **Labeling & Other Forms of Warnings** area of this section.

15.5 Hazardous Chemical List

- The Manager or Supervisor at each facility will have responsibility for identifying and inventorying all hazardous chemicals and substances relevant to their facilities activities whether it is construction, paving, the quarry, batch plants, etc.
- The list shall be created and maintained by the supervisor of that facility and shall be updated, as necessary.
- A copy of the inventory can be accessed on the will be kept on file at each facility in the beginning of each SDS Notebook.
  - Lists can also be accessed via ASMG Velocity EHS online account.
- New chemicals will be added as they are received and chemicals no longer in inventory will be removed from the list as they are consumed and/or properly discarded.

- The Facility Manager or Supervisor shall notify the Safety Manager whenever a chemical is no longer being utilized, to ensure compliance with the 30- year archiving requirement for the SDS.
- A formal inventory and updating of the list should be conducted annually.
- **Each hazardous chemical must be cross-referenced to an appropriate Safety Data Sheet.**
- The master HCL will be maintained by the Environmental Department
  - The digital list can be accessed via ASMG Velocity EHS online database.
- Each Facility shall keep an HCL for the hazardous chemicals and substances that they have in their inventory; such inventory shall be updated annually, and as new chemicals are added.
  - Additions or deletions from the list shall be reported as they may occur.

15.6 Safety Data Sheets (SDS)

- The Hazard Communication Standard requires that an SDS (MSDS) be available to all employees for each hazardous chemical identified and used. If a facility receives a chemical container labeled as a hazard, an SDS (MSDS) is required to be on file. It should be noted that SDS includes any MSDS when the MSDS has yet to be replaced by an SDS.
- Each Facility Manager or Supervisor is responsible for acquiring and maintaining updated versions of all SDS or MSDS. A copy of the SDS sheets for any new hazardous chemicals or substances shall be forwarded to the Safety Manager for inclusion in the Main SDS Book which is kept at the main office in Sunderland, MA. It is the responsibility of the Facility Manager or Supervisor to ensure that they obtain an SDS for any new product they receive.
- The SDS will be written in English and will consist of all information listed below.
  - The format of the 16-section SDS must include the following sections:
    - Section 1. Identification
    - Section 2. Hazard(s) identification
    - Section 3. Composition/information on ingredients
    - Section 4. First-Aid measures
    - Section 5. Fire-fighting measures
    - Section 6. Accidental release measures
    - Section 7. Handling and storage
    - Section 8. Exposure controls/personal protection

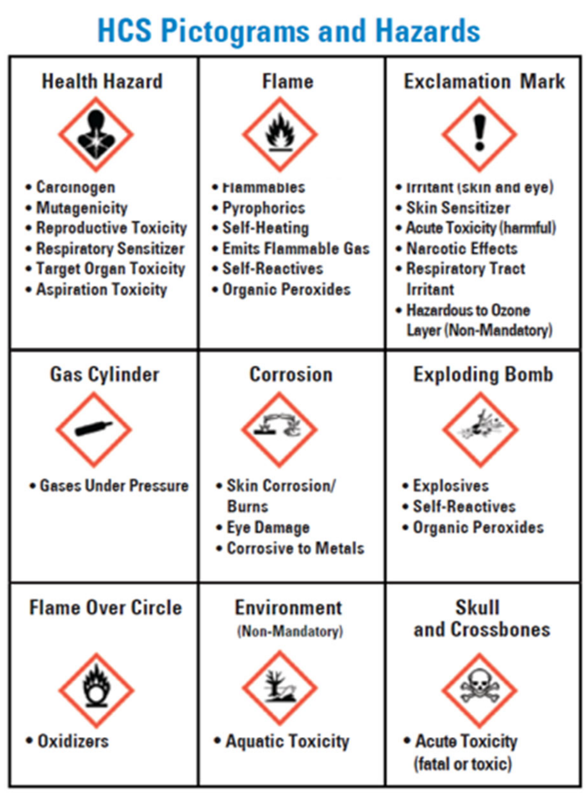
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information
- Section 13. Disposal considerations
- Section 14. Transport information
- Section 15. Regulatory information
- Section 16. Other information, including date of preparation or last revision

- All new procurements of hazardous chemicals should be evaluated and, whenever possible, the least hazardous substance will be purchased.
- Training of all employees regarding any new or updated SDS will be documented.
- Purchase orders for hazardous chemicals should include a request for a current SDS.
- Hazardous chemicals should not be incorporated into any work process until an SDS has been received and reviewed by employees exposed to the chemical.
- Accessibility of Safety Data Sheets:
    - A current SDS library will be maintained in each Facility and a main copy will be kept in the Main Office in West Springfield, MA, for all hazardous chemicals identified and listed on the HCL.
    - The SDS will be readily available to all employees during normal business hours.
    - If a new SDS contains changes or new information, the old SDS will be replaced with the new one in both the master file and the worksite file.
    - Affected personnel will review updated or modified SDS.
- **ASMG Manufactured or Distributed Products**
    - The Facility Manager at each facility is responsible for ensuring that an SDS is available for each product they manufacture or distribute.
        - An SDS shall be provided to customers on the first shipment of a product, on the next shipment after an SDS has been updated, and when requested by the customer.

- The ASMG Division of New England Emulsions Corp shall be responsible for developing and updating the SDSs for chemicals that the ASMG Companies manufacture or distribute.

15.7 Labels & Other Forms of Warning

- Chemical manufacturers, importers, distributors, or employers who become newly aware of any significant information regarding the hazards of a chemical shall revise the labels and SDS for the chemical within three months of becoming aware of the new information and shall ensure that labels on containers of hazardous chemicals shipped after that time contain the new information.
  - If the chemical is not currently produced or imported, the chemical manufacturer, importer, distributor, or employer shall add the information to the label before the chemical is shipped or introduced into the workplace again.
- **Containers** of hazardous chemicals will be properly labeled with at least the following information:
  - Chemical manufacturers and importers will be required to provide a label on containers that includes a globally harmonized signal words, pictograms, and hazard statement for each hazard class and category. Precautionary statements must also be provided.
  - Identity of the hazardous chemical;
  - Appropriate hazards and warnings; and
  - Name and address of the manufacturer.
- **Pictogram:** A symbol plus other graphic elements, such as a border, background pattern, or color that is intended to convey specific information about the hazards of a chemical. Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e. a red diamond). There are nine pictograms under the GHS. However, only eight pictograms are required under the HCS.



- **Signal words:** a single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for less severe hazards.

- **Hazard Statement:** a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- **Precautionary Statement:** a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling of a hazardous chemical.
  - **Unlabeled containers that contain hazardous chemicals must not be used.**
  - Secondary (also called "in plant") containers (containers in which a chemical is transferred into for plant use, such as putting a cleaning solution in a squirt bottle) will be labeled as follows.
    - Identity of the hazardous chemical (same name as on SDS);
    - Summarized hazard information using the Hazard Management Information System (HMIS); and
    - Use the secondary container only for the chemical identified on the label.
    - The secondary container will be emptied and washed as needed. The label will not be removed until the container no longer contains that specific chemical.
- **Alternate methods** of labeling (signs, placards, batch tickets, process sheets and like written materials) may be used on individual stationary containers in lieu of affixed labels, provided the alternative method identifies the containers to which it applies and conveys the required information and is readily accessible to employees in their work area throughout the shift.
- **All primary and secondary containers** will be regularly checked and verified that labels have not been defaced or removed and the information contained on them is current.

15.8 Training & Communication

- Prior to an assignment, each employee who works with or is potentially exposed to hazardous chemicals will receive training on the Hazard Communication Standard, hazards of chemicals in their work area and tasks, and how to prevent exposure.
- New employees will be assigned the ASMG Orientation course on ClickSafety which contains our Hazardous Communication information.
  - Additional training should take place at specific sites where unique chemicals are used in specific tasks.
- Prior to the introduction of a new hazardous material or updated hazard, each employee will be trained concerning specific use or handling procedures.
  - Training will emphasize the following elements:

        - A summary of the Hazard Communication Standard and ASMG Hazard Communication Plan;
        - Hazardous chemical properties, including visual appearance and odor and methods that can be used to detect the presence or release of hazardous chemicals.
        - Physical and health hazards of the chemicals in the work area, including signs and symptoms of exposure.
    - Procedures to protect against hazards, including:
        - Personal protective equipment required.
        - Proper use and maintenance.
        - Work practices or methods to ensure proper use and handling of chemicals.
        - Emergency response procedures.
        - Work procedures to ensure protection when cleaning up incidental hazardous chemical spills.
        - Location of SDS, interpretation of their contents and labelling information, as well as instructions for employees in how to obtain and use appropriate hazard information.
        - Explanation of the labeling system and instructions for preparing secondary container labels.
        - Employees right to access and copy their medical file and exposure monitoring data.
            - Human Resources is responsible for communicating to employees their rights as well as how to request and receive copies of their medical files and any exposure monitoring data.

- **Employee training will be documented**.
    - Retraining is required when a chemical hazard changes or when a new hazard is introduced into the workplace. It will also be company policy to include hazard communications into regularly scheduled staff meeting agendas.
    - The training program will be assessed by obtaining input from employees regarding training they have received and their suggestions for improvement.

15.9 Non-Routine Tasks

- Maintenance or other supervisor contemplating undertaking a non-routine task, e.g., instrument repair and cleaning, will ensure that employees are informed of chemical hazards associated with the performance of these tasks and that appropriate protective measures are taken prior to the beginning of the task.

15.10 Unlabeled Pipes

- ASMG facilities have various pipes and hoses that contain hazardous chemicals, such as air conditioner refrigerant liquid/gas piping, asphalt piping, and other pipes and hoses.
  - Employees are explained how to determine the contents of these pipes and hoses as part of the training, but an emphasis should be made to label all pipes.

15.11 Multi-Employer Work Sites

- ASMG may use or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be potentially exposed. Examples are subcontractors working for ASMG, ASMG a subcontractor, and ASMG working at a host employer facility.
  - ASMG will discuss with other employers:
    - How ASMG will provide access to safety data sheets for each hazardous chemical the other employer(s)' employees may be exposed to while working;
    - How ASMG will inform the other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies; and,
    - How ASMG will inform the other employer(s) of the labeling system used in the workplace.
    - ASMG may request the same information from other employers.