

HAZARD COMMUNICATION PROGRAM

This section has been prepared to comply with the requirements of the OSHA standard 1926.59 and to insure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to all employees. The main purpose of this section is to ensure that the hazards of all chemicals used by employees are understood. The three basic methods by which this will be accomplished are as follows:

1. Proper labeling and other warnings.
2. Understanding and use of Material Safety Data Sheets (MSDS).
3. Employee training program.

A. CHEMICAL INVENTORY

- a. The Company maintains a list of all known chemicals commonly used by employees. This inventory list is on file in the main office and copies are available to all employees. This list will be periodically updated to cover any new products.
- b. Any hazardous chemicals used on particular job sites should be included on the master list. Whenever an employee notices the use of a new chemical that is not on file, notify the office so the chemical list can be updated and the MSDS can be obtained. Employees who purchase or pick-up such chemicals should obtain the MSDS from the vendor if possible.

B. CONTAINER LABELING

- a. All chemicals on site will be stored in their original or approved containers with proper labeling attached except for small quantities for immediate use (see B. b.). Each container of hazardous chemicals must be labeled or tagged with the following information:
 - i. Identity of the hazardous chemicals.
 - ii. Appropriate hazard warnings (i.e.: Flammable, Combustible, Harmful, Fatal if Ingested, Skin or Eye Irritant, Corrosive, Toxic, etc.).
- b. Employees may dispense chemicals from their original containers only in small quantities for immediate use by that person. At the end of the work period, the chemical must be returned to its original container. If unfit to return to the original container, the unused portion must be disposed of properly. Contact your supervisor or foreman for proper handling of the hazardous waste.
- c. No unmarked containers of any size will be left unattended in the work area. If these type containers must be left, they must be properly labeled as in B. a.
- d. The Company will rely on manufacturer applied labels whenever possible. All employees are required to ensure these labels are maintained legible and in good condition. No defacing of such labels will be tolerated. Containers that are not labeled or their manufacturers label has been defaced or removed must be re-labeled.

- e. The Company and employees will be responsible for ensuring that all containers are labeled with the identity of the hazardous chemicals and appropriate warnings.

C. MATERIAL SAFETY DATA SHEETS (MSDS)

- a. The Company complies and maintains a file on MSDS sheets for all hazardous chemicals commonly used by its employees. These sheets contain a list of all hazardous chemical ingredients as well as physical, chemical and health hazard characteristics of the product. These sheets also contain medical and other important information concerning the product. These sheets are very informative and available to all employees.
- b. Employees working with a hazardous chemical should request a copy of the MSDS sheet. Requests will be made to the main office.
- c. On larger jobs (i.e.: with office or job trailer) pertinent MSDS sheets will be kept on file.
- d. Emergency access to MSDS sheets can be made by calling the main office via company radio or cellular phone.

D. Employees will be given training to work safely with hazardous chemicals. The training will be focused on the types of chemicals used by this company and will include the following:

- a. Methods of detecting a release of hazardous chemicals in the work area. Examples will include our hazardous atmosphere monitors as used in confined spaces, as well as visual and odor detection. Discussion on specific chemicals used by The Company will be included (i.e. gasoline, pvc cement, solvents and shop chemicals).
- b. The physical and health hazards associated with chemicals used by The Company.
- c. Protective measures to be taken when working with certain chemicals. This will include information on how to use the chemicals safely.
- d. Use of personal protective equipment. Employees will become familiarized with the types of personal protective equipment available, when to use certain types, and their limitations.
- e. Emergency Response. All personnel must be familiar with the basic method of emergency response. In the event of an emergency, the appropriate person(s) must be called **IMMEDIATELY**. The person designated must immediately call for help via company radio, cellular phone or nearest pay phone. The office must always be notified and training will prepare employees to respond to different types of emergencies in the appropriate way. Proper labeling of chemicals and knowledge and access of the appropriate MSDS will assure the quickest and most effective response. Most labeling contains information such as how to flush eyes, when and when not to induce vomiting and specific treatments. Emergency numbers will be posted at all company phones and vehicles.
- f. Information on the Hazard Communication Standard. A basic overview of the Hazard Communication Standard will be given so that all employees will have a basic understanding of its requirements.

- g. Training on label and warning systems.
Employees will be familiarized with what to look for on labels (i.e. warnings like Flammable, Combustible, etc.).
- h. Explanation of Material Safety Data Sheets (MSDS)
Employees will be familiarized with the basic makeup of the MSDS and how to get useful information from them. Copies of MSDS sheets for commonly used chemicals will be distributed and explained.

E. PERSONNEL PROTECTIVE EQUIPMENT (PPE)

- a. Required PPE will be supplied to all employees by The Company. All personnel are issued safety glasses and hard hats and are responsible for the care and use of them. Other equipment such as ear protection, full-face shields, respirators, etc., will be supplied upon request. The Company will ensure that appropriate training is given to all employees on the proper use of PPE.
- b. Personnel found not using the appropriate protection for any given job are subject to disciplinary actions up to and including discharge.

F. EMERGENCY RESPONSE

- a. Any incident of over exposure or spill of a hazardous chemical/substance must be reported to the office at once.
- b. The foreman or the immediate supervisor will be responsible for insuring that the proper emergency response actions are taken in leak/spill situations.

G. HAZARDS OF NON-ROUTINE TASKS

- a. Supervisors will be responsible for informing employees about any special task that may arise where there could be exposure to hazardous chemicals/conditions.
- b. The nature of the hazard must be clearly explained as well as safe work procedures and protective equipment needed. This must be done before any work on the special task begins.

H. INFORMING OTHER EMPLOYERS

- a. All contractors and sub-contractors are required to follow the rules set forth in the Hazard Communication Standard.
- b. The Company will cooperate with other companies on the same worksite by exchanging or combining information on hazardous chemicals known to be on the site. All employers on site will be responsible for briefing their own employees.
- c. The Company will provide all other employers on site with this Hazard Communication Program.

I. POSTING

- a. The Company has posted the following information in the main shop in order to notify employees of their rights.

ENGINEERS CONSTRUCTION, A C PAVING CORP, ECI DIRECTIONAL DRILLING, AND ECI RAIL CONSTRUCTORS, HAVE A WRITTEN HAZARD COMMUNICATION PROGRAM IN COMPLIANCE WITH VOSHA/OSHA 1926.59

In accordance with the standard, the following items are available to employees upon request:

1. Copy of the written Hazard Communication Program.
 2. Copy of the OSHA Hazard Communication Standard.
 3. Copy of the Company's list of Hazardous Chemicals commonly used.
 4. Copies of MSDS sheets for any covered chemicals to which you are exposed.
- J. Appendix I and J are attached to this document immediately following this section. They contain basic definitions and training materials to ensure understanding of Hazardous Chemicals and their safe use.
- K. Appendix K contains a copy of the Hazard Communication Standard.

MEDICAL SERVICES AND FIRST-AID

- A. Telephone numbers of physicians, hospitals or ambulances must be conspicuously posted at all phone locations.
- B. An OSHA approved first-aid kit must be available on every job. Make sure the kit is fully stocked with contents listed on the inside cover. Supplies are available at the shop and in the main office.
- C. Job supervisors must determine the means by which emergency help will be summoned (i.e. company radio, cellular phone, nearby telephone, etc.).
- D. When a medical facility is not readily accessible, a person trained to render first aid must be available at the work site.
- E. First aid training will be made available through the company.
- F. All accidents and injuries must be reported immediately to foreman/supervisor and to the office. All injured personnel must go to an Immediate Care Health Center within 24 hours of accident.

PERSONAL PROTECTIVE EQUIPMENT

Employees are responsible for wearing appropriate protective equipment when there is exposure to hazardous conditions or a need to reduce hazards.

A. HARD HATS

Hard hats are required to be worn by all personnel at all job sites. They may be removed only while in trucks or in equipment with cabs. Each employee is issued a hard hat and is responsible for its condition.

B. EYE PROTECTION

Safety glasses, goggles or face shields must be worn:

- a. At all times when on IBM property or on Burlington Electric Department jobs.
- b. At all times while performing any operation where eye injury could occur (i.e. hammering, chipping, jack hammering, cutting, or other operation where flying debris could enter the eyes.).
- c. Goggles must be worn over employee owned prescription glasses when the glasses don't meet industrial safety standards.

C. HEARING PROTECTION

Ear muffs or ear plugs must be worn in all areas where sound levels exceed 85 decibels. Example of such noise levels include: jack hammering, chipping, impacting, chain sawing, air or cut-off sawing and use of air blow pipes.

D. RESPIRATORY PROTECTION

Dust masks and respirators may be used as conditions dictate. Respirator will be used or supervised by trained personnel only. Exposure to gases, fumes, vapors, and mists above the threshold limit value for that substance must be avoided.

E. APPROPRIATE CLOTHING

Shirts, full-length pants, and work boots are required attire on all job sites. Steel toed shoes or steel over toes must be worn whenever there is potential injury to toes.

F. LIFE JACKETS

US Coast Guard approved life jackets or buoyant life vests will be worn when working over or near water where danger of drowning exists.

G. GLOVES

Gloves should be worn whenever working in situations where danger of cuts, scrapes, abrasions and other hand injuries exists.

FLAG PERSONNEL

- B. Flag personnel will be used whenever other measures do not adequately control traffic in a safe manner. These persons will wear reflective vests in addition to their regular safety equipment such as hard hats.
- C. All flag persons will be trained and will use orange flags or sign paddles (Sign paddles usually required).
- D. A means of communications must exist between flag persons when directing traffic flow. Hand held radios are available from the main office for this purpose.
- E. For night operations requiring a flag person, the Project Manger shall prepare a traffic plan to be approved by the Safety Officer. During night operations, flag persons must wear reflector vests and should have some type of illumination on them or have a light to direct attention.