



HAZARD COMMUNICATION PROGRAM

PURPOSE

The purpose of this hazard communication program is to protect Tate Engineering Systems' workers from chemical hazards. Each worker will receive a copy of this hazard communication program during his or her initial hazard communication training session. Also during initial training workers will be informed about where the hazard communication program is kept on site. Workers will have access to the program at all times and will be provided with an additional copy at any time upon request.

LOCATION OF MATERIALS

Tate Engineering Systems' Hazard Communication Program and corresponding safety data sheets (SDS) are available for observation at any time by any company worker and any other job site employer at any of our branch offices or service vehicles.

Workers who have questions about anything regarding hazard communication should direct their questions to the Safety Manager and or Service Manager. Safety Manager acts as the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

LABELING

The Safety Manager through the receiving department is responsible for ensuring that all job site containers and shipped containers of chemicals that belong to Tate Engineering Systems are properly labeled. Receiving will verify that all containers received for use will be clearly labeled in accord with the requirements of HazCom 2012, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier's contact information.

Tate Engineering Systems will rely on the suppliers' labels unless the labels have been removed or are illegible. In such cases the Safety Manager will authorize the receiving department to affix the appropriate stick-on labels to the improperly labeled containers. The appropriate information will be added in English to the stick-on labels, including the identity of the hazardous chemicals, hazard warnings and the name and address of the chemical manufacturer, importer or other responsible party.

The chemical containers will be inspected on a regular basis by the receiving department to ensure that they are properly labeled and that the labels are current and legible. 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. When a chemical is transferred into a secondary container, the container will be properly labeled unless the contents are to be used up immediately.

The receiving department must contact the Safety Manager and provide the SDS for any new chemical brought into the branch. When a label must be revised for any chemical or, significant information regarding chemical hazards has been updated, immediately contact the Safety Manager with the new information to update container labeling and SDS management.

All OSHA regulated chemicals will be labeled according to the requirements of the applicable standard.

The Service Managers in each branch will ensure that all secondary containers are labeled with the original supplier's label or with an alternative workplace label. For help with labeling, see Safety Manager.

The Safety Manager and Inventory Manager will review the company identification of chemicals in branches by way of confirming labeling on all substances every year and will update labels as required.

SAFETY DATA SHEETS

The Safety Manager is responsible for supporting the Branch Service Managers efforts in obtaining and maintaining safety data sheets for every chemical that belongs to Tate Engineering Systems. Tate Engineering Systems requires all of its suppliers to provide a safety data sheet for each chemical that it provides to the company. The Safety Manager will verify that each chemical used by this company is recorded in the chemical information list and that there is a corresponding safety data sheet for that substance. Each time a new chemical arrives at the job site and each time newly received chemical information becomes apparent the Safety Manager will update the chemical information list and safety data sheets as appropriate.

Safety Data Sheets will be maintained in a three ring binder format. Workers who need immediate access to safety datasheets can access them by leaving their work area and retrieving them from their service vehicle.

Electronic files will also be available in the Safety folder on the corporate server.

When safety datasheets are not received from a supplier at the time of the first shipment, the following procedure will be implemented.

- The suppliers will not be paid until safety datasheets are provided for all chemicals.
- The Branch Service Manager and or the Safety Manager will attempt to locate the SDS on line and verify it is the correct SDS with the manufacture.
- When no SDS is available on line and the supplier does not respond to requests to provide the SDS, Tate Engineering Systems may report the manufacture to the local OSHA office and or federal offices.
- Tate will discontinue using the product, remove it from its facilities and return un-used quantities to the manufacture.

WORKER INFORMATION AND TRAINING

The Safety Manager is responsible for conducting hazard communication training. This training must take place during the employee's safety orientation, before the employee begins their work assignment, when chemical hazards change, at least once every other year. The general training format will be as follows:

- I. The training will be based on general hazard categories including flammability, health, corrosiveness and reactivity hazards. Specific information on each chemical will be readily accessible to all workers through container labels and safety datasheets.

- II. At the initial training session each worker receives a sample safety datasheet and review the hazard communication program including the chemical information list. The topics of initial training include:
 - A. the requirements of OSHA's Hazard Communication Standard;
 - B. the routes of entry of chemicals into the human body;
 - C. the methods and observations that may be used to detect the presence or release of hazardous chemicals in the workplace;
 - D. the physical, health, corrosiveness and reactivity hazards of the chemicals in the workplace; and
 - E. the measures that workers can take to protect themselves from the hazards, such as work practices, emergency procedures and personal protective equipment (PPE).
- III. Each time a new chemical hazard is introduced into the workplace, all company workers will receive training on the identity of the new chemicals, the hazards associated with them and how they can protect themselves from the hazards.

NON-ROUTINE TASKS INVOLVING HAZARDOUS CHEMICALS

Periodically, employees are required to perform non-routine tasks that may result in temporary exposure to hazardous chemicals. Such non-routine tasks are unpredictable in nature and often will involve items unique to an Owner's facility. When a non-routine task using chemicals is encountered by an employee, that employee is responsible to report the situation to his/her site foreman prior to beginning work. Employees will not be provided hazardous chemical information and training for such non-routine tasks unless it is determined through a hazard assessment that a hazardous condition exists. Upon request by an employee, Tate Engineering Systems will provide the employee with information about the hazardous materials he or she may encounter during the non-routine activity.

If it is determined that a hazardous condition exists with the non-routine task, employees performing the task will be provided with information that includes specific chemical hazards, safety measures or protective equipment the employee should use. Employees will also be trained on the steps Tate Engineering Systems is taking to reduce the hazards, such as ventilating, providing PPE, and administrative controls to reduce exposure.

INFORMING OTHER EMPLOYERS/CONTRACTORS

It is the responsibility of the site foreman to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and precautionary protective measures for their employees. It is the responsibility of the site foreman to obtain information about hazardous chemicals used by other employers or contractors to which our employees may be exposed.

SDSs for hazardous chemicals introduced into the work area by Tate Engineering Systems will be made available of review by contractors and customers. The site foreman maintains either a paper copy or electronic copy on-site. In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this organization.

The program shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director. The written program is kept at the branch and an electronic version is always available in the Safety Folder on the Udrive for TECHNICIANS to reference while at job site.

LIST OF HAZARDOUS CHEMICALS

A list of all known hazardous chemicals in the workplace is available in the Safety Folder on the Udrive. This list includes the name of each chemical, and the work area(s) in which each of the chemicals is used. Further information on each chemical may be obtained from the SDSs, located by hyperlink on the list.

When new chemicals are received, this list is updated within 60 days of introduction into the workplace. To ensure that any new chemical is added in a timely manner, the following procedures shall be followed:
Scan and email SDS to Safety Manager

The hazardous chemical inventory is compiled and maintained by Safety Manager

CHEMICALS IN UNLABELED PIPES

Work activities may be performed by workers at client sites in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the worker shall be informed by Client responsible person and/or position about the identity and hazards of the chemicals in the pipe, as well as required precautionary measures required to be followed.

PROGRAM AVAILABILITY

A copy of this written Hazard Communication Program will be made available, upon request, to workers, their designated representatives (e.g.: union rep), and representatives of OSHA. Each TATE location has access to the written hazard communication program. that describes how the requirements for labels and other forms of warning, safety data sheets, and employee information and training will be met.