

# JT TIMBER FALLING, INC.

## HAZARD COMMUNICATION PROGRAM

### PURPOSE

The purpose of this plan is to establish a program and procedures for the safe use of hazardous chemical substances at JT Timber Falling, Inc.

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) calls for the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012. The written hazard communication program will include and address the following criteria in order to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area
- Methods used to ensure that all containers are labeled, tagged or marked properly
- Methods used to obtain and maintain safety data sheets (SDSs)
- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of non-routine work practices
- Methods used to provide the employees of other employers (e.g., sub-contractors) on-site access to SDSs for each hazardous chemical that the other employer's employees may be exposed to while working in the workplace
- Methods used to inform the employees of other employers of precautionary measures that need to be taken to protect themselves during the workplace's normal operating conditions and in foreseeable emergencies
- Methods used to inform the employees of other employers of the labeling system used in the workplace

The hazard communication program will identify the following:

- Key personnel responsible for the program
- Location of chemical inventory list and SDSs
- Workplace labeling system
- Good work practices and procedures to minimize exposures
- How training will be performed
- Procedures to maintain the program and update the required information
- How records will be maintained

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### RESPONSIBILITIES

The safety coordinator, Lanny Trumble, is responsible for administering the hazard communication program.

This person is also responsible for:

- Reviewing the potential hazards and safe use of chemicals
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Ensuring that all containers are labeled, tagged or marked properly
- Providing new-hire and annual training updates for employees
- Maintaining training records
- Properly selecting personal protective equipment
- Identifying hazardous chemicals used in non-routine tasks and assessing their risks
- Informing outside contractors who are performing work on company work sites about potential hazards
- Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements

Lanny Trumble, is also responsible for:

- Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace
- Reviewing incoming hazardous chemicals to verify correct labeling
- Holding hazardous chemicals from use until receipt of the SDS for the product

Employees are responsible for the following aspects of the hazard communication program:

- Identifying hazards before starting a job
- Reading container labels and SDSs
- Notifying Jim or Lanny Trumble of torn, damaged or illegible labels or of unlabeled containers
- Using controls and/or personal protective equipment provided by the company to minimize exposure
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
- Participating in training

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### CHEMICAL INVENTORY LIST

Attached to this program is a list of hazardous chemicals used, or stored at JT Timber Falling, Inc. Copies of the chemical inventory list are available in each SDS binder and in the office. This list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical (product) is used *or* possible exposure to the chemical (product) could occur, and the personal protective equipment and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced to the workplace.

### LABELS AND OTHER FORMS OF WARNING

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

JT Timber Falling, Inc. will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

- Product identifier
- Signal word
- Hazard pictogram(s)
- PPE pictogram(s)
- SDS reference

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee or used over

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the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

### **SAFETY DATA SHEETS**

An SDS (safety data sheet) will be obtained and maintained for each hazardous product in the workplace. SDSs for each hazardous product will be readily accessible during each work shift to all employees when they are in their work areas.

SDSs will be obtained from the manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list.

The safety coordinator will maintain the master file of all original SDSs. Hard copies of the appropriate SDS Binder will be located in each mobile shop truck and the shop.

SDSs for new products or updated SDSs for existing products will be obtained by Lanny Trumble who will then update the master file and each SDS binder with new and/or updated SDSs.

If problems arise in obtaining an SDS from the manufacturer, importer or distributor, a phone call will be made or an email sent to request an SDS and to verify that the SDS has been sent. The phone call or email will be documented. The company will maintain a written record of all efforts to obtain SDSs. If these efforts fail to produce an SDS, the local OSHA office will be contacted for assistance.

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### **EMPLOYEE INFORMATION AND TRAINING**

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry)
- Operations in the work area where hazardous chemicals are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs
- Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
- Explanation of the labels received on shipped containers
- Explanation of the workplace labeling system
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.

### **NON-ROUTINE TASKS**

The safety coordinator and the immediate supervisor of an employee performing a non-routine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed.

### **SUB-CONTRACTORS**

Prior to beginning work, the safety coordinator will inform sub-contractors with employees working on company property of any hazardous chemicals that the sub-contractors' employees may be exposed to while performing their work. The safety coordinator will also inform sub-contractors of work practice control measures to be employed by the sub-contractor, personal protective equipment to be worn by the sub-contractors' employees, and

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any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the safety coordinator will advise sub-contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the sub-contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the sub-contractor and that company operations do not expose sub-contractors' employees to hazards.

The safety coordinator will inform sub-contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

### **RECORDKEEPING**

Records pertaining to the hazard communication program will be maintained by the safety coordinator. The safety coordinator will keep the following records:

- Chemical inventory list
- Hazardous material reviews
- Copies of phone calls logs and/or emails requesting SDSs
- Employee training records
- Warnings issued to employees for not following the hazard communication program

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**Acknowledgement of Receipt of the Hazard Communication Program**

I, (print name) \_\_\_\_\_ have read and understand the Hazard Communication Program at JT Timber Falling, Inc. I have had opportunities to ask questions and have my questions answered.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Employer Signature: \_\_\_\_\_ Date: \_\_\_\_\_