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### **SUBPART A - PURPOSE**

The requirements of this section are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS).



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The purpose of this policy is to inform the employee and the employer that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to employers and employees and shall comply with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by ensuring that a written program is in place and maintained at each workplace and consists of:

- Using and understanding a Safety Data Sheet (SDS).
- Compiling a hazardous chemicals list and maintaining any SDS's that are received with incoming shipments of hazardous chemicals.
- Using Safety Data Sheets (SDS').
- Ensuring that containers are properly labeled and not removed or defaced
- Providing appropriate training as per the requirements.

This program applies to all work operations where Berry Bros.' employees may be exposed to hazardous substances under normal working conditions or during an emergency situation. The employee shall be informed of:

- The contents of the hazard communication standard.
- The hazardous properties of chemicals with which you work.
- Safe handling procedures.
- Measures to take to protect you from these chemicals.

## **SUBPART B - RESPONSIBILITIES**

Berry Bros. shall provide information to its employees and any sub-contractor, including new-hires at their initial assignment effective information and training on hazardous chemicals in their work area. Berry Bros. requires that each chemical on its property have a SDS document. (Required of all Chemical manufacturers)

### **Management**

- Ensure compliance with this program.
- Ensure that a written HAZCOM program be developed, implemented and maintained at each worksite.
- Conduct immediate corrective action for deficiencies found in the program.



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- Maintain an effective Hazard Communication training program that will communicate and describe how labels and other forms of warning, safety data sheets, and employee information will be met.
- Make this plan available to employees.
- Monitor the effectiveness of the program.
- Conduct annual audit of the program.
- Monitor employee training to ensure effectiveness.
- Keep committee informed of necessary changes.

### **Shipping & Receiving Manager**

- Ensure all received containers are properly labeled and that labels are not removed or defaced.
- Ensure all shipped containers are properly labeled.
- Ensure shipping and receiving department employees are properly trained.
- Ensure received Safety Data Sheets (SDS) are properly filed.
- Purchasing Agent shall supply HS&E / Risk Management Department with all new SDS documents.
- Obtain, from the manufacturer, SDS for chemicals purchased from retail sources.
- Maintain a list of hazardous chemicals using the identity that is referenced on the SDS.

### **Supervisors**

- Comply with all specific requirements of the program.
- Provide specific chemical safety training for assigned employees.
- Monitor facility for proper use, storage and labeling of chemicals.
- Ensure only the minimum amount necessary is kept at work stations.
- Ensure up to date SDS are readily accessible to all employees on all shifts.

### **Employees**

- Comply with chemical safety requirements of this program.
- Report any problems with storage or use of chemicals.
- Immediately report spills or suspected spills of chemicals.
- Use only those chemicals for which they have been trained.



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- Use chemicals only for specific assigned tasks in the proper manner.

### **SUBPART C - GENERAL PROGRAM INFORMATION**

This written Hazard Communication Plan (HAZCOM) has been developed based on OSHA Hazard Communication Standard and consists of the following elements:

- Identification of Hazardous Materials.
- Product Warning Labels.
- Safety Data Sheets (SDS).
- Written Hazard Communication Program.
- Effective Employee Training.

Some chemicals are explosive, corrosive, flammable, or toxic. Other chemicals are relatively safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, persons who handle chemicals in any area of the Company must understand the hazardous properties of the chemicals. Before using a specific chemical, safe handling methods and health hazards must always be reviewed. Supervisors are responsible for ensuring that the equipment needed to work safely with chemicals is accessible and maintained for all employees on all shifts.

### **SUBPART D - MULTI-EMPLOYER, MULTI-JOB SITE TRAINING**

Employers / clients who produce, use, or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed shall additionally ensure that the hazard communication programs developed and implemented include the following:

- The methods the employer will use to provide the other employer(s) onsite access to SDS's for each hazardous chemical the other employer(s)' employees may be exposed to while working.
- The methods the employer will use to 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.
- The methods other employer will use to inform the other employer(s) of the labeling system used in the workplace.



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- The employer may rely on an existing hazard communication program to comply with these requirements, provided that it meets the criteria established in 1910.1200(e).

This information is typically transmitted by the completion of the Job Safety Environmental Analyses (JSEA's) and / or safety meetings.

This program shall be made available upon request to employees, their designated representatives, the Assistant Secretary and the Director upon request in accordance with the requirements of OSHA 29 CFR 1910.1020(e).

Where employees must travel between work places during a work shift (multi job sites), the written program may be kept at a primary job site. If there is not primary job site, the program should be sent with the employee(s).

## **SUBPART E - ORIENTATION TRAINING**

All new employees shall receive orientation training covering the elements of the HAZCOM program. This training will consist of the following:

- Summary of the standard and this written program
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals.
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., personal protective equipment required, proper use, and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response).
- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- Where SDS's are located, how to read and interpret the information on both labels and SDS's, and how employees may obtain additional hazard information.



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Retraining is required when the hazard changes, or when a new hazard is introduced into the workplace, but it will be company policy to provide training regularly (yearly) in safety meetings to ensure the effectiveness of the program.

As part of the assessment of the training program, the HS&E Department will obtain input from employees regarding the training they have received, and their suggestions for improving it.

### **SUBPART F - JOB SPECIFIC TRAINING**

Employees will receive on the job training from their supervisor. This training will cover the proper use, inspection and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or will be working around. This shall include the cleaning of vessels and the hazards associated with chemicals in unlabeled containers, pipes, vessels, etc. in their work area.

In accordance with the directives of 29CFR 1910.1020(e). Berry Bros.' employees traveling to various remote job sites shall familiarize themselves with the location of the SDS documents on that specific location and be assured of what hazards that might be encountered in the course of carrying out their job functions. Note: In the event that a remote location is more primitive, the necessary SDS data will be transported with the work crew to that location.

Non-English speaking personnel are brought into classes with interpreters that assist with the translations.

### **SUBPART G - IMMEDIATE ON-THE-SPOT TRAINING**

This training will be conducted by supervisors for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

### **SUBPART H - NON-ROUTINE TASKS**

Non-routine tasks are defined as working on, near, or with unlabeled piping, unlabeled containers of an unknown substance, confined space entry where a hazardous substance may be present and/or a one-time task using a hazardous substance differently than intended (example: using a solvent to remove stains from tile floors).

#### **Steps for Non-Routine Tasks**



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- Step 1: Hazard Determination
- Step 2: Determine Precautions
- Step 3: Specific Training & Documentation
- Step 4: Perform Task

The Department Supervisor and Safety Department will evaluate all non-routine tasks before the task commences to determine all hazards present. This determination will be conducted with quantitative/qualitative analysis (air sampling, substance identification/ analysis, etc., as applicable). Once the hazard determination is made, the Department Supervisor and Safety Department will determine the necessary precautions needed to either remove the hazard, change to a non-hazard, or protect from the hazard (use of personal protective equipment) to safeguard the Employees present. In addition, the Department Supervisor or Safety Department will provide specific safety training for Employees present or affected and will document the training using the Chemical Safety Training Checklist form that shall be marked "Non-Routine Task Training".

## **SUBPART I - OFF-SITE USE OR TRANSPORTATION OF CHEMICALS**

An SDS will be provided to employees for each chemical and each occurrence of use or transport away from the company facilities. All State and Federal DOT Regulations will be followed including use of certified containers, labeling & marking, securing of containers and employee training.

## **SUBPART J - GENERAL CHEMICAL SAFETY**

Assume all chemicals are hazardous. The number of hazardous chemicals and the number of reactions between them is so large that prior knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects. The following general safety rules shall be observed when working with chemicals:

- Read and understand the Safety Data Sheets.
- Keep the work area clean and orderly.
- Use the necessary safety equipment.
- Carefully label every container with the identity of its contents and appropriate hazard warnings.



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- Store incompatible chemicals in separate areas.
- Substitute less toxic materials whenever possible.
- Limit the volume of volatile or flammable material to the minimum needed for short operation periods.
- Provide means of containing the material if equipment or containers should break or spill their contents.

### **SUBPART K - TASK EVALUATION**

Each task that requires the use of chemicals should be evaluated to determine the potential hazards associated with the work. This hazard evaluation must include the chemical or combination of chemicals that will be used in the work, as well as other materials that will be used near the work. If a malfunction during the operation has the potential to cause serious injury or property damage, a Job Safety Environmental Analysis (JSEA) should be prepared and followed. Operations must be planned to minimize the generation of hazardous wastes.

The hazards of non-routine tasks are discussed during the JSEA (Job Safety Environmental Analysis) which all employees participate in.


### **SUBPART L - CHEMICAL STORAGE**

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

- Flammable Liquids: store in approved flammable storage lockers.
- Acids: treat as flammable liquids.
- Bases: do not store bases with acids or any other material.
- Other liquids: ensure other liquids are not incompatible with any other chemical in the same storage location.

Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals.



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## **SUBPART M - CONTAINER LABELS**

It is extremely important that all containers of chemicals are properly labeled and written in both English and Spanish. This includes every type of container from a 5000-gallon storage tank to a spray bottle of degreaser. All container labels should contain the following information:

- Identity of hazardous chemicals.
- Appropriate hazard warnings (words, pictures, symbols, or combinations thereof) and names & address of the chemical manufacturer.
- Importer or other responsible party.
- Employees shall be instructed that they shall not remove or deface labels on incoming containers of any hazardous chemicals.

## **SUBPART N - EMERGENCIES AND SPILLS**

In case of an emergency, implement the following Emergency Action Plan:

- Evacuate people from the area.
- Isolate the area.
- If the material is flammable, turn off ignition and heat sources.
- Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area.
- Call for local Emergency Response Team assistance.

## **SUBPART O - HOUSEKEEPING**

- Maintain the smallest possible inventory of chemicals to meet immediate needs.
- Periodically review stock of chemicals on hand.
- Ensure that storage areas, or equipment containing large quantities of chemicals, are secure from accidental spills.
- Rinse emptied bottles that contain acids or inflammable solvents before disposal.
- Recycle unused laboratory chemicals wherever possible.
- DO NOT Place hazardous chemicals in salvage or garbage receptacles.
- DO NOT Pour chemicals onto the ground.
- DO NOT Dispose of chemicals through the storm drain system.
- DO NOT Dispose of highly toxic, malodorous chemicals down sinks or sewer drains.



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## **SUBPART P - SDS INFORMATION**

The chemical manufacturer or importer preparing the safety data sheet shall ensure that it is in English (although BBGCI may maintain copies in other languages as well), and includes at least the following section numbers and headings, and associated information under each heading. In the order listed:

- Section 1, Identification including:
  - Common Name and Chemical Name of the material.
  - Name, address and phone number of the manufacturer.
  - Emergency phone numbers for immediate hazard information.
- Section 2, Hazard identification
- Section 3, Compositions / information on ingredients.
- Section 4, First-Aid measures.
- Section 5, Fire-fighting measures.
- Section 6, Accidental release measures.
- Section 7, Handling and storage.
  - Engineering Controls required for safe product use.
  - Personal protective equipment required for safe product use.
  - Safe storage requirements and guidelines.
  - Safe handling procedures.
- Section 8, Exposure controls / personal protective equipment required.
  - Permissible Exposure Limit (PEL) and Threshold Limit Value (TLV).
  - Acute or Chronic symptoms of exposure.
  - Main routes of entry into the body.
  - Medical conditions that can be made worse by exposure.
- Section 9, Physical and chemical properties.
- Section 10, Stability and reactivity properties.
- Section 11, Toxicological information.
  - Cancer causing properties if any.
- Section 12, Ecological information.
- Section 13, Disposal considerations.
- Transportation information.
- Section 15, Regulatory information
- Section 16, Date the SDS was last updated.



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**SUBPART Q - EMPLOYEE USE OF SDS**

SDSs are to be maintained in a readily accessible location for employee reference. They should be available in case of emergency and made available upon request, to employees, their designated representatives, the Assistant Secretary and the Director.

For SDS use to be effective, employees must:

- Know the location of the SDS.
- Understand the major points for each chemical.
- Check SDS when more information is needed or questions arise.
- Be able to quickly locate the emergency information on the SDS.
- Follow the safety practices provided on the SDS.

A master set of SDS's can be found at the corporate office Berwick, LA. Each individual work site will be responsible for maintaining the SDS for that particular location.

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