

Hazard Communication Program

Whitworth Tool INC

Hazard Communication Program

The purpose of this program is to inform interested persons, including employees, that our company is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training our employees.

This program applies to all work operations at Whitworth Tool Inc. where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements.

Ray Stewart has the overall responsibility for the program, including to review and update the program, as necessary. Copies of this written program may be obtained from Ray Stewart who keeps a copy of the Hazard Communication Program in the EHS Coordinator's Office. Moreover, all employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical list from Ray Stewart.

Finally, if after reading this program, you find that improvements can be made, please contact Ray Stewart. We encourage all suggestions because we are committed to the success of our written Hazard Communication Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

List of Hazardous Chemicals

Our "chemical inventory" is a list of product identifiers of hazardous chemicals known to be present at our workplace. Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the chemical inventory can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of other chemicals may require an actual survey of the workplace.

Ray Stewart updates the hazardous chemical inventory as necessary. The Purchasing Agent is responsible for obtaining the SDS for any new chemical / material that is purchased by Whitworth Tool Inc. Any new SDS will be forwarded to Ray Stewart. Shipping and Receiving personnel make sure that all incoming chemicals / materials have an updated SDS on file.

A copy of the inventory list is attached to this written Hazard Communication Program and can be located in the EHS Coordinator's office. The inventory list is accessible by all employees during work hours. The original will be kept in the EHS Coordinator's Office. The chemical inventory serves as a list of every hazardous chemical for which a SDS must be maintained.

Safety Data Sheets (SDSs)

SDSs are basically fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas.

Ray Stewart is responsible for obtaining and maintaining the SDS's at our workplace and will contact the chemical manufacturer or vendor if additional chemical information is needed. All new procurements for the company must be cleared by Ray Stewart.

SDSs are kept readily accessible to all employees during each work shift at the following location: The Quality Room. Employees will have access to all SDS's at all times. The SDS's will be located in binders in the Quality room.

The procedure followed if the SDS is not received with the first shipment is as follows: If an SDS is not received at the time of first shipment, Ray Stewart or the Purchasing Agent will obtain the SDS from the manufacturer. The chemical / material is not to be used until the SDS is reviewed and a strategy is set in place on how to handle the chemical / material.

Labels and Other Forms of Warning

In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged, or marked in accordance with the Hazard Communication Standard, either with:

- The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s);
or
- The product identifier and words, pictures, symbols, or combination thereof, which provide at least "general" information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the Hazard Communication Program, will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.

While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking because shipped containers of hazardous chemicals must bear this information. Hazards not otherwise classified, if any, do not have to be addressed on a container but must be addressed on the SDS.

Because the product identifier is found on the label, the SDS, and our chemical inventory, the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number. Employees should be aware that label information can be verified by referring to the corresponding SDS.

Ray Stewart is responsible for ensuring that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are legible, in English (although other languages may also be included), and displayed clearly on the container or readily available in the work area throughout each work shift, as required. This person will update labels, as necessary. Ray Stewart also ensures that newly purchased chemicals are checked for labels when containers are received.

If employees transfer chemicals from a labeled container to a portable, secondary container that is intended only for their IMMEDIATE use, no labels, tags, or markings are required on the portable container. Otherwise

portable containers must be labeled, tagged, or marked in accordance with our in-house labeling system for workplace containers.

The in-house labeling system we use for workplace container labeling is: The JJ Keller labeling system is currently being used at Whitworth Tool Inc.

Finally, the following procedures are used to review and update label information when necessary, to ensure that labels that fall off or become unreadable are immediately replaced: All employees are trained that when labels fall off or become unreadable to replace them immediately. Supervisors are also told to look for and replace labels that need to be replaced within their department.

Training

Everyone who works with or is potentially "exposed" to hazardous chemicals on the job will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals before starting work. "Exposure" means that "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." Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided. All training is conducted by Ray Stewart.

Effective information and training is a critical part of the Hazard Communication Program. We train our employees to read and understand the information on labels and SDS's, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas, as well as ways to protect themselves. Our goal is to ensure employees know that they are exposed to hazardous chemicals, have the skills to read and use labels and SDSs, and understand how to appropriately follow the protective measures we have established. We urge our employees to ask Ray Stewart questions for greater comprehension.

As part of the assessment of the training program, Ray Stewart asks for input from employees regarding the training they have received and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical-related illness or injury.

All employees receive training for hazard communication.

Training Content

The training program emphasizes these elements:

- Summary of the Hazard Communication Standard.
- What hazardous chemicals are present in operations in employee work areas.
- Chemical and physical properties of hazardous chemicals (e.g., flash point, reactivity, etc.) and how to detect the presence or release of these chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.
- Any steps the company has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.

- Procedures to protect against hazards and exposure (e.g., work practices or methods to assure proper use and handling of chemicals and any required personal protective equipment and its proper use and maintenance).
- Procedures for reporting and responding to chemical emergencies.
- How to read and use both the workplace labeling system and labels received on shipped containers.
- The order of information found on SDSs and how to read the information and what it means.
- How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

All new employees will receive training on the Hazard Communication Program before they begin working on the floor. If any new chemical / material is brought into the shop, the SDS will be reviewed and strategies on how to handle the chemical will be discussed with the affected employees before the chemical / material will be used. Hazard Communication training will be conducted annually.

Training logs are signed by employees upon completion of their training and are kept by Ray Stewart.

Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisors will inform them about the chemicals' hazards. Their supervisors also will inform them about how to control exposure and what to do in an emergency. The employer will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment all additional training as required.

Examples of special tasks that may expose employees to hazardous chemicals include the following: (include examples of special (non-routine) tasks).

Contractor Employees

All contractors performing work on Whitworth Tool's premises will be trained and informed by Tim Whitworth on the hazard chemicals present and where the SDS's can be found.

Additional Information

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the Hazard Communication Standard, applicable SDSs, and the chemical inventory from Ray Stewart.

Appendix

We have attached to this written program our chemical inventory and other information to ensure better understanding of our program.