

8.0

HAZARD COMMUNICATION / "RIGHT TO KNOW" PROGRAM

References: *OSHA 29CFR 1910.1200*

8.1 – Expectation

The purpose of this program is to ensure that employees and outside contractors of RADA SAFE*T MEMBER are informed of the efforts and methods in complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations Part 1910.1200 and reflects changes to the standard related to the Global Harmonization System (GHS).

8.2 – Duties

Every employee of RADA SAFE*T MEMBER will be informed of the information contained within this Hazard Communication Program (HCP); the hazardous properties of the chemicals with which they work or are exposed to; operations where hazardous chemicals are used; and safe handling procedures and measures to be taken to protect themselves while working with or around these chemicals. In addition, applicable employees will be informed of the hazards associated with non-routine tasks.

The **Safe*T** Coordinator has the overall responsibility for ensuring the program is current and enforced. The program will be always made available for employees to review and/or to obtain a copy from at the **Safe*T** Coordinators' office.

Each Department Manager will be responsible for implementing, training and enforcing this Hazard Communication Program with respect to their department.

8.3 – Hazard Determination Procedures

To determine if a chemical or material to be used in a work area is included within the Hazard Communication Program a Safety Data Sheet (SDS) will be obtained for every chemical found within the facility. If the SDS indicates that the chemical or material is hazardous, it will then be included in the Hazard Communication Program and handled accordingly.

RADA SAFE*T MEMBER **Safe*T** Coordinator will retain a copy of each SDS in the master SDS file as proof of the hazard status, for emergency response and future reference either online, or in binder format.

All correspondence from chemical manufacturers, suppliers or importers stating that a particular chemical is not hazardous will be filed as proof of the chemical properties.

8.4 – General

The **Safe*T** Coordinator or designated employee will maintain an inventory list of all hazardous chemicals.

The hazardous chemical list will be updated with each new hazardous chemical. The chemical will be referenced by the name on the container label, the manufacturer and the SDS number/product code where applicable.

8.5 – Safety Data Sheets (SDS)

Upon purchase of a product, the purchaser shall request a SDS if applicable to the product being purchased. The Department Managers will be responsible for every hazardous and non-hazardous chemical present in their department. Upon receiving the required SDS, the applicable Department Manager will provide a copy to the **Safe*T** Coordinator. The **Safe*T** Coordinator will ensure that the SDS is present in the facility, meets the requirements of the Hazard Communication Standard, that they are in English, and they are fully completed when received prior to, or at the time of receipt of the initial shipment of any material brought into the facilities or sites of RADA SAFE*T MEMBER.

An SDS cannot have any blank spaces. If no relevant information is known for a particular category on the SDS, the chemical manufacturer, or importer preparing the SDS must mark it to indicate that no applicable information was found. If an SDS is received incomplete from a supplier, the supplier will be contacted for clarification on the missing information. Documentation of phone conversations and correspondence must be maintained.

Employees can access significant health and safety information by using the SDS file.

If a SDS is not provided prior to or along with an initial hazardous chemical shipment, Purchasing will contact the supplier by telephone and have the SDS either faxed to or sent at the earliest possible time.

An SDS that is obsolete due to the chemical no longer being used or has been replaced by another shall be achieved.

TRADE SECRETS: A chemical manufacturer, importer or supplier may withhold only the specific chemical identity of a chemical. They cannot withhold the health or physical effects of the chemical. The phone number of the chemical manufacturer or importer must be available on the SDS for contact in case of emergencies.

8.6 - Labels and other forms of warning

The **Safe*T** Coordinator has the overall responsibility to verify compliance of the facility regarding correct implementation of labeling hazardous chemicals. Department Managers are responsible for ensuring that all hazardous chemicals in their control are properly tagged, marked and labeled and updated as required. All hazardous chemicals received by or shipped from RADA SAFE*T MEMBER will list the following at a minimum:

- CHEMICAL NAME / IDENTITY
- GHS SIGNAL WORD
- GHS HAZARD AND PRECAUTIONARY STATEMENTS
- GHS PICTOGRAMS
- PRODUCER IDENTIFIER
- NAME, ADDRESS, PHONE # OF CHEMICAL MANUFACTURER, IMPORTER OR OTHER RESPONSIBLE PARTY

Note: three label elements must be located together - the Signal Word, Hazard Statements, and Pictograms.

In the old labeling format of NFPA or HIMS a "1" rating means the least hazardous with a "4" being the most hazardous. GHS is the opposite in that a "1" classification is the most hazardous with a "5" being the least hazardous.

The Department Manager will refer to the corresponding SDS to verify label information. If the label is determined to be deficient when referring to the SDS, the manufacturer, supplier or importer will be contacted immediately for corrective action. The labeling system of hazardous materials delivered to RADA SAFE*T MEMBER will rely on information provided by the manufacturer, importer or supplier.

If chemicals are transferred from a manufacturer labeled container by an employee to a portable/secondary container that will be utilized immediately and is depleted by that employee during a work shift, then a label is not required on that container. Chemicals that are transferred to a portable container not intended for one employee's immediate use shall be labeled with the chemical's identity and appropriate safety and health hazard information. Labels must be approved by the **Safe*T** Coordinator prior to use.

Employees of RADA SAFE*T MEMBER shall not remove or deface existing labels from incoming containers of hazardous chemicals. The **Safe*T** Coordinator will ensure that labels remain intact by conducting frequent spot checks throughout the facility.

8.7 - Employee Training and Information

Employees of RADA SAFE*T MEMBER who work with or are potentially exposed to hazardous chemicals will receive initial training on the Hazardous Communication Standard and the safe use of those hazardous chemicals. Training will be completed to ensure that all employees receive training when they are first hired. Additional training will be provided to employees whenever a new hazard is introduced into the work area. The **Safe*T** Coordinator will review the employee training program semi-annually to ensure its' effectiveness. As the transition to GHS occurs employees will be trained on:

- New content and format of both SDSs and Labels.
- Understanding of the chemical hazards in the workplace will be as it relates to the new classifications, pictograms, signal words, and labels.

The **Safe*T** Coordinator shall be responsible for coordinating and verifying that Hazard Communication training has been completed. The R.A.D.A. **Safe*T** Director will additionally monitor and maintain records of employee training; including names, dates and trainer and advise on training needs.

Employees will be informed at the time of their initial hire orientation that a copy of this program is available for their review.

8.8 - Independent Contractors

RADA SAFE*T MEMBER, upon notification that an independent contractor will be present at the facility, will advise the contractor or contractors verbally and in person of any chemicals that may be encountered in the normal course of their work at or with RADA SAFE*T MEMBER.

In coordination with the **Safe*T** Coordinator the following information will be provided to contractors:

- Hazardous chemicals to which they may be exposed to while in the workplace.
- Measures to lessen the possibility of exposure.
- Procedures to follow if they are exposed.
- Handling procedures and existing labeling system.
- Availability and location of this written Hazard Communication Program and all SDS's.

Each contractor bringing hazardous chemicals into the facilities shall ensure that the proper hazard information including labeling and SDS's are provided to the **Safe*T** Coordinator or

when applicable the Department Manager prior to the start of the work. They will then in turn inform the employees who are potentially exposed.

8.9 - Non-routine Tasks

Employees assigned or contemplating a non-routine task (any task outside of their normal work duties) will consult with the **Safe*T** Coordinator or applicable supervisor prior to beginning work. This will ensure that these employees are properly trained to perform the task and that appropriate protective measures are taken.

8.10 - Record Keeping

New York State and OSHA have implemented additional requirements regarding employee chemical exposure and program operation record keeping. RADA SAFE*T MEMBER must comply with the New York State "Right-To-Know" Law which includes assembling files containing the name, address and social security number of every employee and master file of the SDS's for all products in use. This will assume that every employee is potentially exposed to every product and will meet the requirements of the law. The current employee information on file shall be used for this purpose.

Employee exposure records will be kept for 40 years.

In addition, RADA SAFE*T MEMBER shall keep a file of all written materials maintained to comply with the "Right-To-Know" Law, including training materials and SDS's, for each toxic substance found in the workplace, whether or not the toxic substance is still used or in the workplace.

