

Hazard Communication Plan

Hurt & Proffitt, Inc.

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Hazard Communication Plan

Purpose

Hurt & Proffitt, Inc. recognizes that our employees are our most valuable asset and the most important contributors to our continued growth and success. We will try to prevent workplace accidents and emergency situations, and are committed to providing a safe working environment for all employees.

This Hazard Communication Plan is to establish procedures to ensure the safe use of hazardous chemical substances and to comply with the requirements of 29 CFR 1910.1200; OSHA HCS 2012.

It spells out how Hurt & Proffitt Inc. will inventory chemicals stored and used, obtain and use Safety Data Sheets, maintain labels on chemical substances and train employees about the hazards of chemicals they are likely to encounter within our office buildings, company vehicles and/or on various project sites.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right to know.

Using this information is part of our shared commitment to a safe, healthy workplace. Copies of this policy may be obtained internally from <http://my.handp.com> or externally from apps.handp.com.

Scope

This program is applicable to all Hurt & Proffitt employees who may be exposed to hazardous chemical's and/or substances as part of their job description and/or that may be maintained and/or stored within the confines of one of our office buildings or vehicles. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Hurt & Proffitt employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent than this program and/or the Federal Regulations as stipulated in 29 CFR 1910.1200 OSHA HCS 2012.

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each workplace that describes how labels and other forms of warning, Safety Data Sheets and employee information will be met.

Safety Manager

The Safety Manager is responsible for updating and administering the hazard communication plan. 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 SDS's.
- Ensuring that all containers are labeled, tagged or marked properly.
- Providing new-hire and annual training for employees.
- Maintaining training records.
- Identifying hazardous chemicals used and assessing their risks.
- Informing outside contractors who are performing work on Hurt & Proffitt property(s) of hazardous materials and/or substances and the locations of SDS's.
- Reviewing the effectiveness of the Hazard Communication Plan and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements.

Employees

- Employees are responsible for following the requirements in the Hazard Communication Plan.
- Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.
- All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.
- Identifying hazards before starting a job.
- Reading container labels and SDSs.
- Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers.
- Using controls and/or personal protective equipment provided by Hurt & Proffitt to minimize exposure.
- Following Hurt & Proffitt 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 Hurt & Proffitt policy concerning the safe handling and use of chemicals.
- Participating in hazardous communication training.

Procedure

List of Hazardous Chemicals

Hurt & Proffitt shall maintain a list of hazardous chemicals known to be present in the company facilities and in company vehicles.

The Hazardous Chemical List is updated as necessary and at least annually by the Safety Manager or their designee. The Hazardous Chemical List must be available for review upon request.

Safety Data Sheets (SDS)

Hurt & Proffitt shall have a Safety Data Sheet (SDS) for each item on the Hazardous Chemical List. The SDS shall be requested from the chemical manufacturer.

The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is prohibited.

Safety Data Sheets are to be maintained in a readily accessible location to employees. SDSs must be made available upon request to employees.

SDSs may be obtained internally from <http://my.handp.com> or externally from apps.handp.com.

The SDS must be kept available for as long as the chemical is used or stored by Hurt & Proffitt.

When a hazardous material has been permanently removed from the work place, it shall be removed from the Chemical Inventory List. The SDS for that material should also be removed from the active SDS files and stored in a separate directory labeled "Historical Safety Data Sheets".

SDSs for hazardous materials to which Hurt & Proffitt employees have been exposed must be maintained after the employee leaves the employment of Hurt & Proffitt.

Methods to Inform Employees of the Hazards of Non-Routine Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisor will inform them about the chemicals' hazards. Their supervisor will also inform them about how to control exposure and what to do in an emergency. Hurt & Proffitt will provide additional training as necessary and appropriate Personal Protective Equipment.

The Use and Care of Labels and Other Forms of Warning

Container labels should contain the following information:

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

The Safety Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.

Damaged labels or labels with incomplete information shall be reported immediately.

Hurt & Proffitt shall not remove or deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

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 throughout each work shift.

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.

Hurt & Proffitt will use the GHS labeling system for secondary containers.

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.

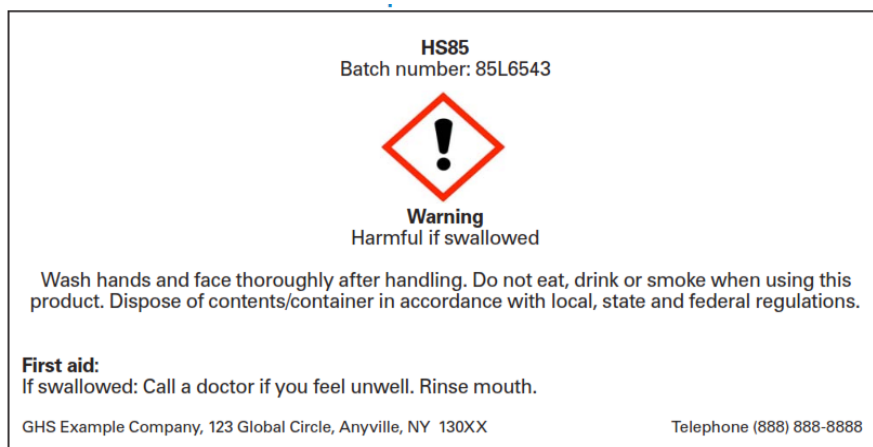
If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled.

Containers received from vendors that are not properly labeled must be rejected.

Pictograms and Hazards

<p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> • Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

Example Label



Multi-Employer Job Sites and/or Multi Work Site

The following specific methods for providing other employer information concerning hazardous chemicals at job sites, methods of providing SDSs, methods of precautionary measures to be taken and methods of providing information on labeling systems:

Multi-Work Sites

Where employees must travel between work places during a work shift (multi job sites), the written program should be kept with the employee.

Multi-Employer Job Sites

A pre-job briefing should be conducted with the client prior to the initiation of work on the site.

- When requested, Hurt & Proffitt shall provide the client SDSs and label information for all hazardous chemicals that Hurt & Proffitt will use on the job site.
- When requested, Hurt & Proffitt shall provide other employers SDSs and label information for all hazardous chemicals that Hurt & Proffitt will use on the job site.
- By providing such information to other employers, Hurt & Proffitt does not assume any obligations that other employers have for the safety of their employees.

Training

Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks supervisors will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The Hazard Communication Program documented training shall, as a minimum, include:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry).
- Operations in the work area where hazardous chemicals are present.
- Location and availability of the hazard communication program, chemical inventory list and SDSs.
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released.
- 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.