



Pannier Corporation

Health and Safety Handbook

Marking System Group



Hazard Communication Plan

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Regulation: 29 CFR 1910.1200 Hazard Communication standard

Policy Statement

It is the policy of Pannier Corporation to reduce employee exposure to hazardous chemicals and the overall incidence of chemical-related injuries and illnesses. All employees who are potentially exposed to hazardous chemicals in their assigned jobs must be fully informed of both the hazardous properties of the chemicals and the protective measures that are available to minimize exposure to these chemicals. This type of information will be made available to employees by means of labels on chemical containers, MSDSs, and training. Employees will be informed of any known hazards associated with chemicals to which they may be exposed before their initial assignment, whenever the hazards change, or when new hazardous chemicals are introduced into their respective work areas.

Plan Administration

Table 1 provides the roles and contact information for the administration of the hazard communication program.

Table #1-Program Contact Information

Task	Contact Person	Contact Information
Program Administrator	John Visconti	412-492-1400 ext. 310
Chemical Labeling	Departmental Supervisors	
Material Safety Data Sheet (MSDS) Inventory	Howard Langston	412-492-1400 ext. 334
Employee Training	John Visconti	412-492-1400 ext. 310

The Plant Manager is responsible for the implementation of the Plan, including reviewing and updating it as necessary.

Labeling. Each department supervisor is responsible for properly labeling all containers of hazardous chemicals and for maintaining and updating the labels that are used in their departments.

MSDS inventory. The Purchasing Manager is responsible for maintaining up-to-date MSDSs and ensuring that they are readily accessible in all work areas.

Employee training. The Quality Manager is responsible for training employees concerning hazardous chemicals in their work areas.

Plan Review and Update

This Plan will be periodically reviewed and updated, and updated whenever new hazards are introduced into the workplace.

Plan Availability

Copies of the Plan, including the written training program, are available upon request to employees, their designated representatives, the state or federal safety regulatory agency, and to the National Institute of Occupational Safety and Health.

Copies of the Plan are available at Pannier Corporation.

Definitions

Chemical--any element, chemical compound or mixture of elements and/or compounds

Hazardous chemical--any chemical which is a physical hazard or a health hazard



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Material safety data sheet (MSDS)--a written description of a hazardous chemical or chemical product which contains comprehensive technical information about a particular substance and explains the risks, precautions, and remedies to exposure related to hazardous chemicals

Labeling

All containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address.

Each Department Supervisor will ensure that all secondary containers in which a substance has been transferred from the original manufacturer's container are labeled with either an extra copy of the original manufacturer's label or with labels marked with the chemical identity, and the appropriate hazard warning.

Material Safety Data Sheets (MSDSs)

The Purchasing Manager is responsible for maintaining the MSDS program. The Purchasing Manager will ensure that procedures are developed to obtain the necessary MSDSs, review incoming MSDSs for new or significant health and safety information, and will see that any new information is communicated to affected employees.

MSDS Access

MSDSs will be readily available to all employees during each work shift. The primary method for accessing MSDSs in work areas is printed copies.

Primary System

Following are the steps that employees will follow to access an MSDS:

1. Access the MSDS book located within each department supervisors office or designated location
2. Access the online MSDS area located on the server

MSDS Not Available

If an MSDS is not available, or an employee has a problem accessing MSDSs, contact the Purchasing Manager or the Quality Manager. The Purchasing Manager will ensure that the missing MSDS is provided to the employee requesting it by his or her next work shift at the latest, unless the company has not received the MSDS from the chemical supplier.

If an MSDS is not received at the time of initial shipment, the Purchasing Manager will contact the supplier, in writing, to request the MSDS. If an MSDS is not received from the supplier in [number; some state rules require no more than 15 days] days, the company will contact the appropriate government agency for assistance in obtaining the MSDS.

Employee Training and Information

The Quality Manager is responsible for the Plan training and will ensure that all program elements are carried out.

Initial Training

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Standard and this Plan before starting work. Before a new hazardous chemical is introduced into any work area of Pannier Corporation, each employee in the affected work area will be given information and training for the new chemical hazard.

Retraining



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Additional training will be conducted by each department supervisor when new chemicals are introduced into the work area. Retraining is not required if the new chemical contains hazards similar to previously existing chemicals for which training has already been conducted.

Recordkeeping

All employees attending hazard communication training sessions must sign a sheet at the end of the session verifying their attendance. The sheet must contain the date of training and the instructor's name.

Training Content and Format

Each new employee will receive information and training that covers:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps Pannier Corporation has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and MSDSs to obtain hazard information
- The location of the MSDS file system and written Hazard Communication Plan

The training delivery method(s) and format are through one-on-one or group training.

Nonroutine Tasks Involving Hazardous Chemicals

Employees will not be provided hazardous chemical information and training for such nonroutine tasks unless it is determined through a hazard assessment that a hazardous condition exists. Upon request by an employee, the Supervisor will provide the employee with information about the hazardous materials he or she may encounter during the nonroutine activity.

If it is determined that a hazardous condition exists with the nonroutine task, employees performing the task will be provided with information that includes specific chemical hazards, safety measures or protective equipment the employee should use, and steps Pannier Corporation is taking to reduce the hazards, such as ventilating, providing respirators, and implementing emergency procedures.

Informing Other Employers/Contractors

It is the responsibility of the Purchasing Manager to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and precautionary protective measures for their employees. It is the responsibility of the Purchasing Manager to obtain information about hazardous chemicals used by other employers or contractors to which employees of this organization may be exposed.



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Other employers and contractors will be provided with MSDSs for hazardous chemicals introduced into the work area by Pannier Corporation. In addition to providing a copy of an MSDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this organization.

Also, other employers will be informed of the hazard labels used by the organization. Where symbolic or numerical labeling systems are used, the employees of other employers or contractors will be provided with information explaining the labels used for hazardous chemicals to which they may be exposed.

Chemicals in Unlabeled Pipes

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employees' supervisor should contact the Purchasing Manager for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions

Antidiscrimination Policy

Each employee must be informed that Pannier Corporation is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.