



## APPENDIX B. Hazard Communication Safety Policy May 2024

### Purpose

The purpose of this program is to evaluate chemicals used in the workplace for hazards and to communicate the information to employees for their education and safety. The program provides training content and guidelines for the identification of chemical hazards, the proper use of chemicals that create a hazard, the preparation and proper use of container labels, placards and other types of warning information, storage and disposal requirements, and measures to minimize or prevent adverse effects from physical, health and environmental hazards.

The Program focuses on:

- Employee Training.
- Chemical Inventory.
- SDS.
- Container Labeling.
- Chemical Storage & Disposal.
- Hazards of non-routine tasks.
- Emergency Response.
- Informing other employers and the public who may be exposed to VSC workplaces.

### Regulatory Scope

This program addresses OSHA's Hazard Communication Standard (HCS). Specifically: Regulations 29 CFR 1926.59 and 1910.1200 and the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

### Responsibilities

VSC will:

- Update this program as regulations change or as dictated by the needs of the workplace.
- Maintain an effective Hazard Communication training program.
- Make this plan available to employees.
- Require that all hazardous chemicals purchased have the proper Safety Data Sheet (SDS).
- Maintain a list of hazardous chemicals using the identity that is referenced on the SDS.
- Ensure SDS' are received and distributed to affected employees.
- Establish Emergency Medical Procedures for the treatment of exposed employees.
- Inspect VSC facilities, fleet vehicles and jobsites to ensure proper storage, labeling and use of chemicals.
- Utilize only containers that are properly labeled, and ensure labels are not removed or defaced.
- Evaluate each task that requires the use of hazardous chemicals to determine the potential hazards associated with the work, to include a review of hazardous chemicals, or a combination of chemicals, that will be used in the work and other materials that will be used near the work.

VSC Employee's will:

- Comply with all specific chemical safety requirements of this program.
- Substitute less toxic materials whenever possible.
- Use only those chemicals for which the employee has been properly trained.
- When working with chemicals keep the work area clean and safe.
- Read, understand and follow the precautions listed on the SDS.

- Use required safety equipment and PPE.
- Store incompatible chemicals in separate areas (i.e. flammables and oxidizers).
- Report any problems with the use or storage of chemicals.
- Provide means of containing the material if equipment or containers break or contents spill.
- Immediately report spills or suspected spills of chemicals to VSC management.
- Follow environmental regulations for the disposal of hazardous chemical waste.
- Report any problems with the use or storage of chemicals.

## Training

- New VSC employees will be provided safety orientation training that covers the elements of HAZCOM and the Right to Know Program.
- Every VSC employee will be provided with information and training on hazardous chemicals in their work area; both chemicals used in the course and scope of VSC work, as well as chemicals that exist at a specific customer jobsite.
- As chemical hazards change, every impacted employee will receive updated training for any new hazard introduced into their work process.
- Additional training will be provided upon request or when an employee's actions exhibit lack of understanding for the safety requirements.
- VSC's Safety Management and Regional Safety Manager will maintain written certification of all training delivered within this program. Records will include: employee name, training topic-to include course content and level of training, date of training, certification (where applicable), and date of future training to maintain certification.
- Any employee who does not comply with the training will be subject to discipline, up to and including termination of employment.

### Training will focus on:

- OSHA's Hazard Communication Standard (HCS) and GHS.
- Location and availability of VSC's written Hazard Communication Program.
- Purpose and expectations of the Hazard Communication Program.
- SDS Information: where to locate it and how to read and interpret the information.
- Inventory of Chemicals used in the workplace – where to find the list at VSC.
- Understanding the hazardous chemical labeling system for secondary containers.
- Methods and observations used to detect the presence or release of hazardous chemicals in the workplace.
- Specific physical and health hazards of chemicals employees may be exposed to in the workplace.
- PPE to use based on known hazards of a chemical and its properties.
- Proper storage, transportation and disposal procedures.
- First aid and other emergency medical procedures in response to chemical exposure.

## Chemical Inventory

- Each VSC district office maintains an inventory of chemicals used on-site or at jobsites. A chemical inventory list is available from the purchasing manager or jobsite supervisor.
- Hazardous chemicals brought onto the jobsite by VSC will be included on the hazardous chemical inventory list.

## Safety Data Sheets (SDS)

- Employees working with a hazardous chemical may obtain a copy of the SDS from their District Office Purchasing Agent, jobsite supervisor or your Regional Safety Manager.
- SDS commonly used for VSC job tasks are also accessible in the VSC Safety Site found in your iPhone, computer, or tablet/iPad.
- SDS will be available on site to provide immediate reference to chemical safety information.
- SDS typically contain the following:
  - *Chemical Product & Company Name*
  - *Composition/Information on Ingredients & Exposure Limits*
  - *Hazards Identification (Fire - Health)*
  - *First Aid Measures*
  - *Fire Fighting Measures (Flammable Limits/Flash Point)*
  - *Accidental Release information*
  - *Handling and Storage Instruction*
  - *Exposure Control & Personal Protection requirements*
  - *Physical and Chemical Properties*
  - *Stability and Reactivity information*

- *Toxicological Data*
- *Environmental, Disposal, Shipping & International Safety notices*
- *Revisions, Updates, References*

#### SDS Information

VSC will ensure that the chemical manufacturer provides SDS' in order to provide additional information concerning the safe use of the product. Each SDS will be written in English and contain the following 16 sections to conform to OSHA's HCS:

Section 1 – Identification	Section 9 – Physical & Chemical Properties
Section 2 – Hazards Identification	Section 10 – Stability & Reactivity
Section 3 – Composition/Information on Ingredients	Section 11 – Toxicological Information
Section 4 – First Aid Measures	Section 12 – Ecological Information
Section 5 – Fire-fighting Measures	Section 13 – Disposal Considerations
Section 6 – Accidental Release Measures	Section 14 – Transport Information
Section 7 – Handling & Storage	Section 15 – Regulatory Information
Section 8 – Exposure Controls/Personal Protection	Section 16 – Other Info, including date of preparation or revision

#### Updates

VSC Safety Management will ensure that all SDS are current and that an SDS accompanies re-orders of chemicals. The SDS will be compared with versions on file to ensure the most current SDS is maintained and used.

#### Access for Employees

VSC Safety Management will ensure all employees have access to copies of the SDS for products they use. SDS, specific to each jobsite, will be maintained in the General Contractor's site office, the VSC company truck, or VSC tool gang box when a company truck is not onsite.

#### Contractors

VSC requires that contractors working at VSC locations, or working on behalf of VSC at jobsites, follow the requirements of this program and provide VSC with copies of SDS for all products the contractor brings on site.

VSC will review with Contractors:

- The location and availability of SDS.
- The procedure to request and obtain a specific SDS from VSC.
- The precautions to take to protect contracted employees.
- The potential exposure to hazardous substances.
- The chemicals used in or stored in areas where they will be working.
- The recommended PPE.
- The labeling system for chemicals.

#### Host Facilities

When working at host facilities VSC Safety Management will determine the method for obtaining information on hazardous materials that employees may be required to use, or to which they may be exposed. VSC will review with the host facility:

- The chemicals used in or stored in areas where VSC employees will be working.
- The potential exposure to hazardous substances for VSC employees.

- The location and availability of host SDS.
- The procedure to request and obtain a specific SDS from the host facility.
- The host facility labeling system for chemicals.
- The precautions to take to protect employees of VSC.
- The recommended PPE.
- The procedure VSC is to follow when bringing chemicals onto the host facility property.

### **Employee Exposure to Jobsite Hazardous Chemicals Introduced by Others**

When working at a customer jobsite, if a VSC employee develops symptoms or a health-related reaction from exposure to a chemical in the customer facility or a chemical used by other trades working at that site, the VSC employee must stop work immediately, exit the area and notify their VSC supervisor. The supervisor or Risk-Safety will contact the customer to obtain information, including SDS for the chemical. No work will continue until the chemical hazard is identified, the hazard is controlled or eliminated, and all necessary precautions and training have been completed. Note: For a medical emergency, dial 9-1-1 for medical assistance.

As part of the Activity Hazard Analysis (AHA) process, VSC management must require host employers to notify VSC of any scheduled maintenance testing or service work performed during VSC operations at the site that could potentially release hazardous chemicals into the atmosphere where VSC employees may be exposed. An example of accidental release: A customer is recharging a refrigeration cold storage facility that uses an Ammonia chemical process and there is an accidental release of Ammonia vapors.

### **Container Labeling**

- Label each container and any secondary containers with the identity of the hazardous chemical contained and any appropriate hazard warnings.
- All chemicals on site will be stored in their original or otherwise approved container with a proper label attached. *Exception: a VSC employee may dispense chemicals from labeled containers into unlabeled containers but only in small quantities intended for his/her immediate use and if it is safe to transfer the chemical from one container to another. Return unused chemicals to the properly labeled container or VSC jobsite supervisor for proper handling.*
- Give any container not properly labeled to the supervisor for labeling or proper disposal.
- Never leave unmarked containers of any size in the work area.
- VSC will rely on manufacturer-applied labels whenever possible. Do not remove, alter or deface the label.
- Unlabeled containers must be immediately labeled as described in this Hazard Communication program.

### LABELS










*The new Hazard Communication Standard (HCS) requires that Chemical manufacturers and importers provide a label that includes a globally harmonized pictogram, signal words, and hazard statement for each hazard class and category. Precautionary statements must also be provided.*

- **Pictogram:** A symbol plus other graphic elements, such as a border, background pattern, or color intended to convey health, physical and environmental hazard information assigned to a GHS hazard class and category. Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e. a red diamond). There are nine pictograms under the GHS. However, only eight pictograms are required under the HCS.
- **Signal words:** A single word used to emphasize hazards and indicate the relative level of severity of the hazard assigned to a GHS hazard class and category. The signal words used are "**Danger**", which denotes a more severe hazard, and "**Warning**" which is used for less severe hazards.
- **Hazard Statement:** Standard phrases assigned to a hazard class and category that describe the nature of the hazard.
- **Precautionary Statement:** Precautionary information supplements the hazard information by briefly providing measures to be taken to minimize or prevent adverse effects from physical, health or environmental hazards. First aid is included in precautionary information.

### PICTOGRAMS

There are nine pictograms to convey the health, physical, and environmental hazards. The final Hazard Communication Standard (HCS) requires eight of these pictograms, the exception being the environmental pictogram, as environmental hazards are not within OSHA's jurisdiction. The table below illustrates the hazard pictograms and their corresponding hazards.

### HCS Pictograms and Hazards

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

#### SECONDARY CONTAINERS

- When pouring a hazardous liquid chemical from the chemical manufacturer's original container (drum, bucket, bottle or can) into a secondary container, it must be an approved container.
- The secondary container must be made of the same protective material and with a tight fitting cap or lid.
- Unapproved containers include empty laundry detergent, juice, milk, cleaner, or soda bottles (Acids, corrosives and petroleum products can deteriorate and even quickly dissolve non-chemical resistant plastics).
- Threader Oil – use an approved one-gallon plastic jug of the type used for motor oil found in auto parts stores.

#### Chemical Storage

VSC requires that all employees follow these storage requirements:

- Maintain the smallest possible inventory of hazardous chemicals to meet immediate needs.
- Ensure storage areas or equipment-containing chemicals are secure to avoid spills caused by accidental upset.
- Lips, strips or bars will be installed across the width of storage shelves to restrain containers that contain chemicals.
- Properly dispose of empty hazardous material containers in compliance with manufacturer and government agency requirements.
- **DO NOT** place hazardous chemicals in garbage cans or salvagebins.
- **DO NOT** pour chemicals onto the ground.
- **DO NOT** dump chemicals into a storm drainsystem.
- **DO NOT** pour highly toxic, malodorous chemicals down sinks or into sewage systems.
- **DO NOT** store chemicals in the same refrigerator used for food storage – if a refrigerator is used the door shall be appropriately labeled.
- Flammable chemicals kept in or on vehicles must be in small quantities for immediate use only and should be stored away from direct sunlight or any other ignition source.

- Avoid storing or accumulating large quantities of chemicals on/in fleet vehicles.
- Distance and barriers will be used to isolate chemicals into the following groups so that incompatible chemicals are not stored together, and to ensure chemicals are not stored with combustible materials (either solid or liquids) where the danger of combustion exists:

Flammable Liquids (Gasoline, Solvents, Paints, etc.)	•Store in approved flammable storage lockers
Acids (i.e. Battery Acid)	•Store in approved containers •Inorganic and organic chemicals should not be stored together •DO NOT store with bases
Bases	•DO NOT store with acids or any other material
Oxidizers	•Store in original containers
Oxygen & Acetylene	•Store <u>separately</u> away from fuel gas cylinders or other combustible materials (especially oil or grease) a minimum distance of 20 feet or by a non-combustible barrier at least 5 feet high with a fire resistance rating of at least ½ hour •Store <u>away from</u> heat sources & open flame •Store in well protected, well ventilated, dry areas •Store with valves tightly closed and protective caps in place •If necessary to avoid accidental upset, cylinders shall be properly secured with chain or other material designed to hold cylinders in secure, upright position

- Risk-Safety will periodically review the stock of chemicals on hand to determine if they have expired, are still being used, are properly stored, and that they are in generally good condition for intended use.
- VSC will ensure that chemicals (solids or liquids) are stored separately in order to reduce the possibility of unwanted chemical reactions caused by accidental mixing.

#### Transportation of Chemicals

- Employees involved in the transportation of chemicals will be trained on requirements specific to the particular chemical.
- VSC will ensure SDS are provided for all hazardous chemicals that are transported away from company facilities.
- All State and Federal DOT Regulations will be followed including use of certified containers, driver qualifications, labeling & marking, and securing of containers.
- All VSC chemical storage guidelines apply to chemicals being transported.
- Secure all certified containers to avoid spills.
- Following the guidelines on the SDS, immediately and safely clean up any spill that occurs in, on, or around the vehicle.

#### **Disposing of Chemicals**

Chemicals will be recycled or disposed of as outlined in VSC's Environmental Program document.

### A List of Chemicals Commonly Used by VSC Employees

Job Title	Tasks	Chemicals
<b>Sprinkler – Installation, Service &amp; Inspection</b>	<input checked="" type="checkbox"/> Operation of threader machine <input checked="" type="checkbox"/> Operation of gas powered equipment <input checked="" type="checkbox"/> Fire proofing of wall and floor penetrations <input checked="" type="checkbox"/> Installation and repair - CPVC pipe and components <input checked="" type="checkbox"/> Install and replace fire pump & components <input checked="" type="checkbox"/> Valve install & service <input checked="" type="checkbox"/> Refueling gas powered lift equipment <input type="checkbox"/> Charging antifreeze fire suppression systems	<input checked="" type="checkbox"/> Threader oil <input checked="" type="checkbox"/> Gasoline <input checked="" type="checkbox"/> Fire proof Caulking or chemical mixtures <input checked="" type="checkbox"/> PVC glue/cement <input checked="" type="checkbox"/> Diesel fuel <input checked="" type="checkbox"/> Spray-paint <input checked="" type="checkbox"/> PB Blaster <input checked="" type="checkbox"/> WD-40 <input checked="" type="checkbox"/> Pipe Dope <input checked="" type="checkbox"/> Vic Lube <input checked="" type="checkbox"/> Teflon tape <input type="checkbox"/> Glycerin pre-mix antifreeze mixture
<b>Alarm -Installation, Service &amp; Inspection</b>	<input checked="" type="checkbox"/> Smoke test of sensors <input checked="" type="checkbox"/> Clean smoke detectors <input checked="" type="checkbox"/> Refueling gas powered lift equipment <input checked="" type="checkbox"/> Installation of wiring conduit <input type="checkbox"/> Replacing & testing batteries	<input checked="" type="checkbox"/> Aerosol spray - “smoke check” <input checked="" type="checkbox"/> Aerosol Air in a can cleaner <input checked="" type="checkbox"/> Diesel fuel <input checked="" type="checkbox"/> Fire proof caulking –wall & floor penetrations <input type="checkbox"/> Battery Acid
<b>Fire Extinguisher/Range Hood Technician</b>	<input checked="" type="checkbox"/> Charging/refilling extinguisher <input checked="" type="checkbox"/> Testing and cleaning extinguisher <input type="checkbox"/> Charging range hood system	<input checked="" type="checkbox"/> Dry chemical powder <input checked="" type="checkbox"/> Cleaning liquids & lubricants <input checked="" type="checkbox"/> Compressed gas <input type="checkbox"/> Dry & liquid fire suppression agents

#### Non-Routine Tasks

VSC defines non-routine tasks as working on, near, or with a hazardous substance that the company normally does not use. This can include materials in unlabeled piping, unlabeled containers, vats, confined space entry where a hazardous substance may be present, a one-time task requiring the employee to work in the area using a hazardous substance, or working in an area that contains a hazardous substance.

*VSC Safety Management requires that non-routine tasks be evaluated before the task commences to determine all hazards present. Once the hazard determination is made, VSC Safety Management will work with the VSC field office to determine the precautions needed to remove the hazard, minimize the hazard, or protect the employees from the hazard (use of engineering or administrative controls or PPE). In addition, VSC will provide specific safety training for affected employees and will document the training.*

