

HAZARD COMMUNICATION PROGRAM GUIDELINES

Bachman Machine Company

One of the major goals of the Occupational Safety and Health Administration (OSHA) is to regulate industries to promote safe work practices in an effort to minimize the incidence of chemically related employee illness and/or injuries. Relative to that goal, OSHA enacted the Hazard Communication Standard, codified as 29 CFR 1910.1200. The purpose of this standard is to establish uniform work place requirements for the communication of hazards and hazardous chemical information to all potentially exposed employees.

Chemical and hazardous substance management is also an important function within the Bachman Machine Company. Properly managing hazardous material procurement, usage, handling, storage and disposal ensures the protection of our employees, the community, and the surrounding environment.

Bachman Machine Company has implemented this written Hazard Communication Program to meet the letter and intent of the Occupational Safety and Health Administration's mandated Hazard Communication Standard (HCS), 29 CFR 1910-1200. It shall also provide guidelines to instruct the Company in the monitoring of chemical and hazardous substance usage, which may cause further requirements in accordance with Federal, State, or Local environmental, safety and health regulations.

The Manager of Human Resources shall be the coordinator of the Bachman Machine Company facility program, acting as the representative of Williams G. Bachman Jr., President and Chief Operating Officer. In general, each employee in the Bachman Machine Company facility will be apprised of the Hazard Communication Standard (HCS), the hazardous properties of chemical that they may work with and the measures to take to protect themselves from these chemicals

I. Chemical Inventory Worksheet—Appendix “A”

Bachman Machine Company is required to prepare and maintain an inventory list of all hazardous chemicals known to be present on-site. The listing of hazardous chemicals shall be maintained in the cabinet identified as the MSDS cabinet, located in Mr. Don Smith's Tool Room Office. Copies of any MSDS are available upon request to any employee who wishes to review the content of any MSDS, (Form FHR-47)

Chemical means any element, chemical compound or mixture of elements and/or compounds. These chemicals can be also present in any form (I.E., solid, liquid, or gas). The required Chemical Inventory list shall contain the following information:

- Material/Chemical name as identified on the manufacturers container label and/or Material Safety Data Sheet;
- The Manufacturers name, address, and/or phone/fax number;
- Hazardous Material Identification System(HMIS) Labeling Information, (See table 3)
- Appearance and odor information;
- Hazard determination (I.E., health hazard, physical hazard, carcinogen, Etc.);
- Target Organs (I. E., skin, eyes, lungs, internal organs) (See table 2);

The chemical inventory worksheet shall be updated as often as necessary or at a minimum of every six (6) months.

II. Material Safety Data Sheet (MSDS)

Bachman Machine Company chooses in good faith to rely upon the MSDS provided to them by the manufacturer or supplier and assumes no responsibility for their contents. Therefore, only MSDS's obtained from the suppliers or manufacturers of the hazardous material shall be used for the purpose of this program, employee "Right-To-Know" information, and community "Right-To-Know" information.

Bachman facilities shall acquire and maintain a completed OSHA form 174, MSDS, or it's equivalent for every known chemical present. Furthermore, requirements of this section apply to free samples provided by chemical manufactures and suppliers, test materials. provided by customers, and all solid metals. An MSDS must be on site prior to or at the time the first shipment of the substance is received. In circumstances where the MSDS is not present prior to or at the time of shipment, then the facility should not accept the substance until the MSDS is secured from the manufacturer or supplier. Faxed copies will be accepted in lieu of original hard copy.

The Manager of Human Resources, the Manager of Purchasing, and the Supervisor of the Maintenance department will coordinate the receipt of MSDS's for the facility and will be responsible for reviewing and updating the MSDS's for accuracy and completeness. Whenever possible, the least hazardous substances should be procured for use within the facility. MSDS's that meet the requirements of the HCS must be fully complete and received at the facility either prior to, or at the time of receipt of the first shipment of a potentially hazardous chemical purchased from a vendor. It may be necessary to discontinue procurement from a vendor who fails to provide the required approved MSDS in a timely manner.

Each material safety data sheet shall be in English (although the facility may obtain copies in other languages as well), and shall contain at a minimum the following information:

NOTE: See appendix "B" for the layman's explanation of what a MSDS should contain and Appendix "C" for and explanation of terms commonly used on MSDS forms.

- Identity used on the label
- Chemical and common name(s) for single substance hazardous chemicals
- For mixtures tested as a whole:

- a) Chemical and common name(s) of the ingredients which contribute to the known hazards.
 - b) Common name(s) of the mixture itself.
- For mixtures not tested as a whole:
 - a) Chemical and common Name(s) of all ingredients which are health hazards (1 percent concentration or greater), including carcinogens (0.1 percent concentrations or greater)
 - b) Chemical and common name(s) of all ingredients which are health hazards and present a risk to employees, even though they are present in the mixture in concentrations of less than 1 percent or 0.1 percent carcinogens.
- Chemical and common name(s) of all ingredients, which have been determined to be, present a physical hazard when present in the mixture.
- Physical and chemical characteristics of the hazardous chemical (vapor, pressure, flash point, Etc.) Physical hazards of the hazardous chemical including the potential for fire, explosion, and reactivity.
- Health hazards of the hazardous chemical including signs and symptoms and medical conditions aggravated.
 - a) Primary routes of entry
- OSHA permissible exposure limit (PEL), The American Conference of Government Industrial Hygienist (ACGIH) Threshold Limit Value (TLV), Other exposure limit(s) including ceiling and other short-term limits.
- Information on Carcinogens listing (reference OSHA regulated carcinogens, those listed by the National Toxicology Program (NTP) annual Report on Carcinogens and/or those listed by the International agency for Research on Carcinogens (IARC).
- Generally applicable procedures and precautions for safe handling and use of the chemical (hygienic practices, maintenance and spill procedures)
- Generally applicable control measures (engineering controls, work practices and personal protective equipment required).
- Pertinent emergency and first aid procedures.
- Date that the MSDS was prepared or the date of the last change.
- Name, address and telephone number of the responsible party.

All MSDS's that do not contain the above mentioned information will be rejected and the product will not be accepted by or otherwise used in the facility until the supplier or manufacturer is contacted and send or faxes a MSDS containing all of the required information.

Bachman Machine Company will maintain in the workplace a library of the required MSDS 's for each hazardous material known to be present, and shall ensure that they are readily available and accessible during each work shift. Electronic access, microfiche, and other alternatives to maintaining paper copies of the MSDS are permitted as long as no barrier to immediate employee access is created by such options.

Material safety data sheets shall be made readily available, upon request, to medical professional, employee representatives, OSHA representatives, EPA representatives, as well as, State, Local and Federal agency representatives. Additionally, a single copy of an MSDS shall be made available to employees when the MSDS Request Form (Form FHR 47) is completed by the

employee and presented to the departmental supervisor or the Human Resources Manager. (See Appendix “D”).

III. Hazard Determination

Bachman Machine Company does not make or synthesize the chemicals that are used and must rely on the manufacturer, distributor, or supplier of a chemical or hazardous material to determine the hazards associated with a chemical or hazardous substance or material. This information should always be available on the MSDS form. If this information is not provided or it is inadequate, the manufacturer or supplier should be contacted in writing and requested to provide an MSDS that does provide this information.

All MSDS for chemicals and hazardous materials will be reviewed for physical and health hazards (See Table 1) to exposed worker and appropriately indicated on the chemical inventory worksheet. These MSDS will also be reviewed to determine if the chemical or material or any of its components are known, potential, or suspected carcinogens. If the material is or contains a known, potential, or suspected carcinogen, the carcinogen designation of the chemical inventory worksheet will be appropriately marked “known”, “potential”, “suspected”, or “N/A” for not applicable.

IV. Container Labeling and Other Forms of Warning

All containers of hazardous materials or substances known to be present in the facility shall be appropriately labeled either by use of the manufacturers label or by use of an in-plant labeling technique. Labels should list as least the chemical identity, the name and address of the manufacturer, importer or other responsible party, and the appropriate hazard warning. The hazard warning can be any type of message, words, pictures, or symbols, which convey the hazard of the chemical(s) in the container. Labels must be legible, in English, and prominently displayed.

A procedure to physically examine all incoming containers of all compressed gases and all other raw materials for the proper labeling shall be implemented in our receiving department and monitored by the receiving clerk. All instances of non-compliance to this labeling requirement shall be brought to the attention of the Receiving Supervisor and the program administrator immediately. Periodic departmental inspections by the supervisor will check to insure that labels are up to date and correct.

The in-plant labeling system shall utilize the Hazardous Material Identification System (HMIS). Labels must have a minimum of the following:

- The name of the Product name as referenced on the MSDS.
- The hazard ratings for flammability, reactivity, and health as referenced on the MSDS under HMIS information.
- The personal protective equipment required in accordance with the HMIS.

Special hazard designation requiring the employee to review the MSDS(I. E., “P”- physical hazards, “H” – health hazards, “T” – target organ hazards, and “C” – carcinogen).

Several exemptions to in-plant individual container labels are allowed:

- When hazardous chemicals are transferred from previously labeled containers to portable containers for immediate use by the employee who makes the transfer, labels are not required for the portable container. However, the container is required to have the appropriate labeling when it is stored for future use or not completely used during the shift of the transfer.
- If a number of stationary containers within a work area have the same or similar contents and hazards, signs or placards can be posted in the area which convey the hazard information.

In addition to the in-plant labeling procedure, all hazardous materials and hazardous waste that are shipped from the Company premises must meet the packaging labeling requirements of DOT, 49 CFR Chapter 1, Subchapter C, and EPA, 40 CFR, Chapter 12, Subchapter 1.

V. Contractors and Temporary Employees

Facility Responsibilities:

Anytime outside contractors or temporary employees are hired to perform work on a Company property, the authorized facility manager responsible for contracting will also be responsible for obtaining the MSDS’s for all hazardous materials that will be brought onto the site by the contractor or his employees. All MSDS’ should be obtained prior to the actual start of any work and will be kept in a special section of the MSDS library listing. MSDS’s for each contractor on-site should be provided a cover sheet with the name of the contractor, nature of the work being performed, date work is to begin, and the date work is scheduled to be completed.

All facility employees working with the contractor or in the area where there is the potential for exposure should be made aware that the MSDS’s for these materials are available for review. It will be the facility manager. The facility manager hiring the contractor shall also be responsible for informing the contractor of the availability of MSDS’s for materials to which the contractor’s employees could potentially be exposed. If the contractor is to conduct work on piping or vessels that contain or have contained a chemical, the potential hazards of the chemical(s) must be communicated to the contractor and his employees.

Contractor Responsibilities:

Generally, it will be the responsibility of the contractor to observe and comply with all requirements of the Company policies and procedures, OSHA Hazard Communication Standard, 29 CFR 1910.1200, and any other applicable federal, state, or local agency’s regulations, standards, or laws. It will also be the contractor’s responsibility to obtain the MSDS’s for all materials that contain hazardous substances and provide copies of these to the authorized facility

personnel. The contractor will be responsible for communicating to his/her employees and to the Company employees, as required, the hazards associated with the materials that they will be using on the facility premises.

VI. Non-Routine Tasks

Occasionally, employees may be required to perform non-routine tasks, which may involve the use of hazardous substances. Such tasks may include the following:

- Entry into confined spaces such as mixing tanks, storage tanks, pits, sumps or other below grade areas where heavier than air vapors may accumulate.
- Working on unlabeled pipes or process equipment.

Prior to starting work on such projects, each employee involved should be given information by his/her supervisor and/or the program administrator about hazards to which they may be exposed during such an activity. This information should include:

- The specific hazards
- Protective and safety measures which must be utilized

The measures the Company has taken to lessen the hazards, including special ventilation, respirators, the presence of another employee, air sample reading, if applicable, and emergency procedures, if needed.

VII. Employee Training

Bachman Machine Company shall provide employees with effective information and training on hazardous chemicals in their work areas at the time of their initial assignment, whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area, and whenever required by other federal, state, or local regulatory agency. Employee training shall include at least the following:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work place area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, Etc.)
- The physical and health hazards of the chemicals in the work area
- The measures employees can take to protect themselves from the hazards, including specific procedures the facility has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used or worn
- The procedure for hazardous chemical spills and leaks
- The proper identification, handling, storage, and disposal procedure for hazardous wastes; and,
- The details of the hazard communication program implemented at the facility, including and explanation of the labeling system and the material safety data sheet (MSDS), the location of MSDS's, and how an employee can obtain and use the appropriate hazard information.

In addition to the employee training, a documentation procedure shall be developed and maintained in order to provide evidence that each employee is trained as required. This documentation should be kept in a location that is easily accessible and separate from other unrelated documentation. The documentation should contain the following information, (See Appendix “E” for a copy of the training acknowledgement):

- Date of training
- Employee name
- description of the training
- Employee signature to certify training was received
- Instructor’s name and/or affiliation

VIII. Plan Administration

The Hazard Communication Program for the Bachman Machine Company facility will be monitored by the Manager of Human Resources. Questions regarding this program should be directed to the Manager of Human Resources.

Signature_____

Title_____

Date_____

Revision Number A
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Policy Number 415

Bachman Machine Company

HAZARD COMMUNICATION

PROGRAM GUIDELINES

**THESE PROGRAM GUIDELINES ARE DESIGNED TO MEET THE
REQUIREMENTS OF THE OCCUPATIONAL SAFETY AND HEALTH
(OSHA) MANDATED HAZARD COMMUNICATION STANDARD (HCS)
29 CFR 1910-1200**

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