UNGER
CONSTRUCTION CO.

Proof of Training (revised 1/24/17)

Print name: _____Signature: _____ Date: _____

Hazard Communication Program

Purpose

The purpose of this program is to ensure the protection of employees and subcontractors from the hazards associated with potentially hazardous materials as well as setting policies and procedures concerning Hazard Communications which will enhance the safety and wellbeing of Unger Construction employees and subcontractors.

Scope

This policy will apply to all work performed by employees and subcontractors including, but not limited to the following activities: construction, installation, demolition, remodeling, relocation, refurbishment, testing, and servicing or maintenance of equipment or machines and at other times when potentially hazardous substances are brought to and used within the job site

Responsibilities

Management (Board of Directors and Project Managers)

Management is responsible for ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this program are readily available where and when they are required. Additionally, management will monitor the effectiveness of the program, provide technical assistance as needed, and review the program bi-annually.

Program Manager

Dave Simpson is responsible for the development, documentation, training and administration of the program. This position carries the responsibility of insuring this program is adhered to and that proper reporting is executed.

Supervisors (Superintendents and Foreman)

Supervisors will act as the Hazard Communication Officers for their jobsite, ensuring that each and every chemical used on-site is properly labeled from Day One. Each new worker, as they arrive on the jobsite, will be given a site specific orientation which will include Unger Constructions expectations with respect to chemical labeling, handling, storage, use and disposal.

Supervisors are responsible for ensuring that a task specific job hazard analysis (JHA), also known as a safe work plan, is developed. The JHA will select, implement and document the appropriate site-specific control measures as defined within this policy. Supervisors will direct the work in a manner that ensures

the risk to workers is minimized, adequately controlled and that practices defined by this policy will be followed.

Supervisors are responsible for ensuring Unger Construction employees and subcontractors are following expectations. Supervisors will be held accountable for enforcing the requirements of this program. Undesirable behavior will not resolve itself, therefore supervisors must be directly involved with modifying behaviors inconsistent with program expectations. Supervisors will be held accountable for enforcing Unger Construction's disciplinary program.

Workers (Employees and Subcontractors)

Unger Construction has high expectations and requires safety excellence for each employee, crew, project and for our entire company. Workers are required to follow the minimum procedures outlined in this program. Workers are responsible for knowing the hazards and the control measures established in the JHA. Workers are responsible for using the assigned PPE in an effective and safe manner.

Workers are responsible for stopping unsafe acts and correcting unsafe conditions on the spot as soon as they are discovered. Workers are responsible to ensure that each and every chemical container is properly labeled before work begins. Any deviations from this program must be immediately brought to the attention of your supervisor. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

Hazardous Material Survey

Unger Construction requires hazardous materials surveys before demolition or renovation work begins. The survey shall include all of the following: A visual inspection of a facility or a portion thereof for suspect materials, sampling and laboratory analysis of any suspect materials found for the presence of asbestos. The hazardous materials survey will also furnish a written report that includes: a description of the area(s) visually inspected, a detailed description of any suspect material sampled, the results of any laboratory analysis of suspect materials, the method of analysis, and the total amount of asbestos containing material. Typically a floor or roof plan is included with the report to reference the written information visually.

The person conducting the survey must be certified pursuant to OSHA and/or EPA regulations. The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey needs to be kept in a project file so that it can be accessed when working on future projects.

If lead or asbestos have been confirmed to be present employees and subcontractors must follow Unger Constructions Lead and/or Asbestos program. If hazards such as asbestos or lead will be disturbed during remediation, a properly licensed professional must perform the work and follow appropriate regulations.

Job Hazard Assessment (Safe Work Plan)

Unger Construction utilizes JHA's as our means of hazard assessment and establishing a safe work plan. JHA's are performed by supervisors and/or workers. Our library of hazard assessments is maintained on

the “S” drive. Before beginning a new task refer to the JHA library, generally speaking all scopes of our work are covered. For situations that have not yet been covered select one that is substantially similar and use it as a baseline. JHA’s on the “S” drive are organized by work area and job description. JHA’s include strategies for elimination, substitution, engineering and administrative controls. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

For complex or moderate to high hazard tasks, tasks where an additional level of safety planning is needed, the safety director will perform the JHA with the supervisor and workers.

Training

Each affected employee working for, or associated with, Unger Construction is required to review the training material with the Hazard Communication Officer and sign the acknowledgment form which will be placed in the workers file. This training is to be done during the new employee orientation process before the new employee actually assumes status as an active employee. Employees will receive training on any new hazardous chemical/material introduced in to the work place before the chemical/material is used. In addition to this training, affected employees must be shown the locations of Safety Data Sheets, fire extinguishers, first aid kits, and usage and storage of hazardous materials.

Training will include the following: Understanding the purpose and scope of the OSHA Hazard Communication Standard; Explanation of the federal, state and local right-to-know laws; Definition of the various "hazardous chemical" classifications; Explanation of situations and elements that must be present for a material to be considered a health hazard; Explanation and interpretation of the labeling, requirements on all containers, and the Hazard Materials Identification System (HMIS); Understanding and interpretation of Safety Data Sheets (SDS), which must be obtained for each hazardous chemical; Responsibilities as an employee or subcontractor of Unger Construction; Policies and procedures to follow in case of exposure.

Proof of training is available on the “S” drive. The training data base can be sorted by employee name or by subject. This ensures supervisors and employees are able to confirm they have the necessary training and if they don’t which employees do. Employees that need training should contact their project manager or superintendent to make arrangements for them to be trained.

Who is responsible for making sure the SDS is available on the jobsite?

When chemicals are first brought out to the jobsite (Day One) a printed copy of the SDS will be provided to an Unger Construction supervisor. The SDS will be copied/scanned and placed in the projects jobsite files. A copy of the SDS will be attached to the JHA (safe work plan) which will be reviewed and approved by an Unger Construction supervisor and then posted at each individual work area where the chemical will be used.

The company that will be using the hazardous material (chemical/substance) is responsible for making sure the SDS is available. However, as a general contractor by definition we have a dual responsibility. x

Hazardous Chemical List

A list of the hazardous materials and chemicals, which are used in each work area, will be maintained and updated by the organization performing the work. For each chemical used, an SDS sheet must be available at the specific work location. Typically they are attached to the JHA and posted in the work area.

Jobsite SDS binders and jobsite files can make locating a specific SDS cumbersome. To ensure rapid review of a SDS Unger Construction utilizes laptop computers, tablets or smart phones to access the internet. Information from the container label will be entered into the search browser to link into the official safety data sheet. For example enter the chemical name followed by SDS into the search browser.

Safety Data Sheets (SDS)

All Safety Data Sheets must be kept in an organized fashion and must be placed in an identified and accessible location for all employees to view at will. As a general contractor by definition Unger has a dual responsibility. To ensure the SDS is available on Unger Construction jobsites we utilize laptop computers, tablets or smart phones to access the internet. Information from the container label will be entered into the search browser to link into the official safety data sheet. For example enter the chemical name followed by SDS into the browser.

If a hazardous chemical or substance is received without a proper SDS, the receiving person must immediately notify the Hazard Communication Officer. The manufacturer or distributor of the product must be contacted immediately and asked to email the SDS. If, for some reason, the manufacturer or distributor is unable to produce a SDS upon request, the Hazard Communication Officer should be notified immediately. Hazardous materials or substances received without an SDS are to be returned to the sender.

Labeling

Each container of hazardous materials shall be labeled, tagged or marked with either the: Product identifier, Signal word, Hazard statements, Pictograms, Precautionary statements or combination thereof. Labels and warnings must be legible and prominently displayed.
Appropriate labels must be on all containers, regardless of size. Containers must be approved and recommended for storage and/or dispensing of the particular hazardous chemicals contained in them.

Worn and torn labels must be replaced. It is the responsibility of employees to report inappropriate labels to their supervisor. It is the responsibility of the organization using the chemical to insure that appropriate labels are in place and that replacement labels are available.

Small portable containers of Hazardous Materials, less than 6 ounces, do not require labeling if they are transferred from labeled containers and are intended for immediate use by the employee who performs the transfer providing the JHA and SDS are posted in the work area.

Storage

All storage areas for hazardous substances are to be secured, properly ventilated, and identified by signs.

Non-Routine Tasks

Before any non-routine task is performed, workers shall be advised and/or they must contact their supervisor for special precautions to follow, in essence a new job hazard analysis (safe work plan) shall be developed. Each worker will be trained on the specific hazards and methods of control.

Partially Used/Unused Containers or Excess Inventory Removal/Disposal

At the completion of each specific task the organization responsible for performing the work will remove all partially used, unused containers and excess inventory from the jobsite. Organizations that fail to remove partially used/unused containers or excess inventory will be back charged at 2 times the normal labor rate. Disposal is the responsibility of the organization responsible for performing the work. Disposal shall be in accordance with regulatory requirements.

Discussion about the Transition from MSDS to SDS

In the United States we have numerous organizations/agencies that set rules or regulations with respect to hazardous materials. For example the National Fire Protection Association (NFPA), Hazardous Materials Identification System (HMIS), National Institute for Occupational Safety and Health (NIOSH), Chemical Abstract Service (CAS), American Conference of Governmental Industrial Hygienists (ACGIH) and the Occupational Safety and Health Administration (OSHA) just to name a few. Imagine the complexity when you reference hazardous materials on a global level, it is incredibly confusing. This is why we are converting from material safety data sheets (MSDS/SDS) to the Global Harmonizing Systems (GHS) of Safety Data Sheets (SDS).

The Global Harmonizing System (GHS) is an internationally embraced system to simply and standardize hazardous materials labeling and safety data sheets. Due to the massive effort (all international hazardous materials manufacturers) the implementation timelines are lengthy. Voluntary compliance could begin as early as December 1, 2013. The mandatory compliance deadline is June 1, 2016. This means that Unger Construction and our subcontractors could have both systems active and in place for 1-1/2 years. There will likely be some confusion amongst us and our subcontractors. The intent of this communication is to clarify the expectations of us and our subcontractors.

The key to the both the MSDS/SDS program is the containers label. Labels on containers are not to be removed or defaced. The labels must have their hazard warning, any and all words, pictures, symbols or combination thereof viable at all times. The labeled container needs to be readily available in the work area, throughout each shift. Portable containers into which hazardous substances are transferred should be labeled. The only exception to the labeling requirement for secondary containers is when the hazardous material will be used immediately and only by the employee that performed the transfer. Historically MSDS/SDS's have not followed a uniform format, they can vary greatly. Safety Data Sheets will follow a strict format listed below. While all sections of the Safety Data Sheet are important Section 8 is the first section that should be referenced for our scope of work.

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SDS Overview

Section 1 Product identifier; (name of the chemical) manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2 Outlines the hazards identified by the chemical. Including classifications of the chemical based on the OSHA standard. Signal word (danger or warning), hazard statements, pictograms, precautionary statements. Hazard(s) identification includes all hazards regarding the chemical.

Section 3 Lists the composition of the chemical, chemical name, any common names or synonyms and any health effects the components might cause.

Section 4 First-aid measures focusing on route of exposure such as inhalation, skin or eye contact and ingestion including important symptoms/ effects, acute (immediate), delayed; and required treatment.

Section 5 Fire-fighting measures including suitable extinguishing media/techniques, equipment, the special protective equipment and precautions for fire fighters.

Section 6 Appropriate measures in the event of accidental release, emergency procedures; protective equipment and proper methods of containment and cleanup.

Section 7 Safe handling and storage; including incompatibilities with other chemicals.

Section 8 Exposure controls/personal protection; Permissible Exposure Limits (PELs) the amount a worker can be used to for 8 hours per day, 5 days per week for a 30 year career without harm. Threshold Limit Values (TLVs) such as Short Term Exposure Limits (STEL). STEL is a spot exposure for duration of not more than 15 minutes or Immediately Dangerous to Life and Health (IDLH). IDLH levels will likely cause death or permanent adverse health effects. Depending on the PEL and TLV numbers appropriate engineering controls to eliminate or reduce the exposure and/or personal protective equipment (PPE) will need to be in place.

Section 9 Physical/chemical properties and the chemical's characteristics.

Section 10 Potential reactivity and stability; the possibility of hazardous reactions. Conditions to avoid such as static discharge, shock, vibration or incompatible materials.

Section 11 Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12 Environmental and ecological information*

Section 13 Disposal considerations*

Section 14 Transport information*

Section 15 Regulatory information*

Section 16 Other information; including the date of preparation or last revision.

Hazard Communication Standard Labels

As of June 1, 2016, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. Product identifier: how the hazardous chemical is identified. Signal word: used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, "Danger" and "Warning." Pictogram: OSHA's required pictograms must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. OSHA has designated eight pictograms under this standard for application to a hazard category. Hazard statement(s): describe the nature of the hazard(s) of a chemical. Precautionary statement(s): means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling. Name, address and phone number of the chemical manufacturer, distributor, or importer.

Hazard Communication Standard Pictogram

As of June 1, 2016, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

Health Hazard  Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity	Flame  Flammables Pyrophoric Self-Heating Emits Flammable Gas Self-Reactive Organic Peroxides	Exclamation Mark  Irritant (skin and eye) Skin Sensitizer Acute Toxicity Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  Gases Under Pressure	Corrosion  Skin Corrosion/Burns Eye Damage Corrosive to Metals	Exploding Bomb  Explosives Self-Reactive Organic Peroxides
Flame Over Circle  Oxidizers	Environment (Non-Mandatory)  Aquatic Toxicity	Skull and Crossbones  Acute Toxicity (fatal or toxic)