



GREAT ARROW
Construction

HAZARD COMMUNICATION PROGRAM

Committed to providing a safe workplace
for our employees and contractors.

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HAZARD COMMUNICATION PROGRAM IN ACCORDANCE WITH OSHA 29 CFR 1910.1200

TABLE OF CONTENTS

1.0 <u>General</u>	29 CFR 1910.1200 (a-c)
1.1 <u>Location of Plan</u>	
1.2 <u>Designated Personnel</u>	
1.3 <u>Updating & Evaluating</u>	
2.0 <u>Container Labels</u>	29 CFR 1910.1200 (f)
2.1 <u>Materials Received</u>	
2.2 <u>Materials Shipped</u>	
2.3 <u>Missing Labels</u>	
2.4 <u>Portable Containers</u>	
3.0 <u>Material Safety Data Sheets</u>	29 CFR 1910.1200 (g)
3.1 <u>Location (s)</u>	
3.2 <u>Hazard Determination</u>	29 CFR.1200 (d)
3.3 <u>MSDS Information</u>	
3.4 <u>Missing MSDS</u>	
4.0 <u>Employee Information and Training</u>	29 CFR 1910.1200 (h)
(Employee Right to Know)	
4.1 <u>Initial Training</u>	
4.2 <u>Retraining</u>	
4.3 <u>Record Keeping</u>	
4.4 <u>Training Format</u>	
5.0 <u>Hazardous Non-Routine Tasks</u>	29 CFR 1910.1200(e)(l)(ii)
5.1 <u>Great Arrow Construction Policy</u>	
5.2 <u>Specific Training</u>	
5.3 <u>Non-Routine Tasks</u>	
6.0 <u>Chemicals in Unlabeled Pipes</u>	29 CFR 1910.1200(e)(1)(ii)
6.1 <u>Piping Contents</u>	
7.0 <u>Multi-Employee Work Sites</u>	29 CFR 1910.1200(e)(1)(iii)
8.0 <u>Hazardous Chemical Section</u>	
9.0 <u>Great Arrow Construction Policies</u>	

1.0 General:

The following Hazard Communication Program (HAZCOM) has been established to insure compliance with all directives pertinent to Code of Federal Regulations (29 CFR 1910.1200). It is the intent of this program to provide all Great Arrow Construction employees and contractors with a reference guide to working with Hazardous Chemicals.

Type of Business: The business of Great Arrow Construction is General Contracting.

1.1 Location of Hazard Communication Plan

The written Hazard Communication Plan is available for review by all Great Arrow employees and contractors at the following central location:

Main Office – 6293 Meeks Rd. Franklin, TN 37064.

Copies of the plan may be obtained from the above at the request of any supervisory personnel.

1.2 Designated Personnel

The following personnel have been designated as responsible for updating and maintaining the hazard communication program, employee training, labeling, and ensuring that MSDS forms are obtained/maintained.

a. Hazard Communications Program:

The Chief Manager of Great Arrow Construction the overall Hazard Communications Coordinator.

b. Employee Training:

Training will be conducted by the Chief Manager of Great Arrow Construction. After completion of initial training, it will be the responsibility of individual supervisors to provide on the job safety training to all newly hired personnel. When new chemicals or chemical products are introduced, additional training by supervisory personnel will be required. When appropriate, external agencies may be contracted to conduct training as required.

c. Labeling on Project Work Site Containers:

It will be the responsibility of the supervisor of the project work site to insure proper labeling of containers. This is to be consistent with the information contained in the appropriate MSDS. NOTE: Common nomenclature must be stated on the label. Chemical symbols may be added, but common nomenclature is mandated by OSHA.

d. Labeling on Shipped Containers:

It will be the responsibility of central receiving to insure all boxes, containers, and cartons which are suspect of containing chemicals are appropriately labeled. Shipments that show damage/leak/or spill are to be refused.

e. Obtaining/Maintaining Material Safety Data Sheet (MSDS):

A central file of MSDS will be obtained by and maintained within the office of Great Arrow Construction. Project work sites will receive MSDS appropriate to their work areas. Site supervisors will be responsible for the maintaining the appropriate MSDS sheets that is specific to their projects. They will also insure that appropriate files of MSDS are maintained in a central location on the project work site. Supervisors will be responsible for providing access to a central file of appropriate MSDS at the project work site.

f. Informing Contractors:

It will be the responsibility of project work site supervisors to inform contractors of the hazards in the work area to which they are assigned. Contractors are to be informed of any restrictions involving use of compressed gasses, flame, or chemicals to be utilized by the contractor as part of the job.

1.3 Updating and Evaluating the HAZCOM Program:

At least once per year, the Hazard Communication Program Coordinator (HCPC) will review and update the program. The HCPC will access the hazardous chemicals and materials in the work areas with the assistance of the Supervisors. The update will consist of each of the following elements of the HAZCOM program:

- a. Hazard assessment
- b. Assessment of applicable regulations
- c. Written plan(s)
- d. Great Arrow Policies
- e. Great Arrow discipline/procedures
- f. Training
- g. Inspection Audits
- h. Designated employee accountability

2.0 Container Labels:

Container Labels will be in accordance with current and accepted OSHA and NFPA Standards.

2.1 Materials Received:

All containers received for use on premises or work site are to be properly and clearly marked in at least English with the following:

- Contents of container
- Hazard of the specific target organ
- Name and address of the Manufacturer

2.2. Materials Shipped:

Any manufactured hazardous substance leaving the work site must be accompanied by the data listed in para. 2.1 of this document. In addition, if a material is shipped, an MSDS is to be included. Chemical waste will be shipped via a contracted vendor, in compliance with EPA, OSHA, and DOT regulations. Records will be maintained in the office of Great Arrow Construction.

2.3 Missing Labels:

Missing, defaced or illegible labels will be replaced immediately with clean, properly marked ones. Notices will be placed on bulletin boards that provide container labeling systems, and location of the HAZCOM program.

2.4 Portable Containers:

Portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer are not required to be labeled. All other portable containers are to be labeled with the content and hazard of the specific chemicals.

3.0 Material Safety Data Sheets:

An MSDS for each hazardous chemical on the project work site is to be maintained in a central location. They will be available for review by all employees or contractors during working hours.

3.1 Location:

A master file of all MSDS will be kept within the office of Great Arrow Construction. MSDSs obtained from Chemical Manufacturers or Distributors will be maintained in file cabinets by Manufacturer and will be cataloged by number assigned and in alphabetical/number sequence.

A project work site specific MSDS file of that area's hazardous chemicals will be kept within a central location of the project work site. i.e. temporary office.

In addition to MSDSs obtained from manufacturer, Great Arrow utilizes the services of a computerized MSDS system from OHS (MSDS On Disk). This system has the capacity to cross reference by Chemical Name, Trade Name, CAS Number, OHS Number, and other reference factors. Project work sites requesting and MSDS will normally receive the MSDS provided via this system as they will normally be more detailed and scientifically specific than MSDS from the manufacturer. Further, MSDS provided via

this system will contain CERCLA and NFPA ratings which may or may not be provided by manufacturer.

3.2 Hazard Determination:

MSDSs will be requested for all incoming hazardous substances. Great Arrow will rely on both furnished MSDS and those produced supplementally via OHS system.

3.3 MSDS INFORMATION:

The designated person will ensure that all MSDS have complete information in each of the following categories:

- a. Identities used on label
- b. Chemical and Common Names
- c. Physical and chemical characteristics
- d. Physical Hazards
- e. Health Hazards
- f. Primary routes of entry
- g. Air exposure limits (PELs, TLVs)
- h. Carcinogenicity
- i. Precautions for safe handling
- j. Control Measures
- k. Emergency and first aid procedures
- l. Date of preparation of MSDS
- m. Name/address/phone number of MSDS preparer or distributor.

3.4 Missing MSDS:

The office of Great Arrow Construction will contact suppliers for any missing MSDS or missing MSDS category information. Contacts will be documented. If the requested information is not received within 30 days, Great Arrow may file a complaint with OSHA, or find a new supplier. Documentation of requests will be maintained.

4.0 Employee Information and Training:

4.1 Initial Training:

Prior to beginning work with hazardous chemicals, each employee will be required to attend a hazard communications training class. They will view a video presentation concerning HAZCOM. Supervisors will ensure that new employees are trained, and that the training is documented.

4.2 Retraining:

Additional training will be conducted by supervisors when new chemicals are introduced into the project work site. Retraining is not required if the new chemical contains hazard similar to previously existing chemicals for which training has already been conducted. Monthly safety meetings will be held and hazardous materials will be discussed.

4.3 Record Keeping:

The trainer or supervisor will require all employees attending the Hazard Communication Course to sign a sheet verifying their attendance.

4.4 Training Format:

Each employee or contractor attending the safety course will receive a lecture and Audio Visual Training. Training will include the following:

- a. The location and availability of the written Hazard Communication Program and MSDS.
- b. Training on the physical and health hazards of the chemicals in the work area.
- c. How to reduce or prevent exposure to these hazardous chemicals through proper work practices, engineering procedures, emergency procedures and personal protective equipment to be used.
- d. What Great Arrow has done to reduce or prevent the workers exposure to chemicals.
- e. Procedures to follow if they are exposed to chemicals.
- f. Methods and observations used to verify the presence or release of a hazardous chemical.
- g. Explanation of the details of the program, labeling, the MSDS, and how employees can obtain and use appropriate information.

5.0 Hazardous Non-Routine Tasks:

5.1 Great Arrow Construction Policy:

It is Great Arrow's policy that no employee or contractor will begin work or any non-routine task without first notifying the appropriate supervisor or instructor.

5.2 Specific Training:

Any non routine task will require specific training concerning the hazards associated with the task. This training will include information on:

- Specific Chemical Hazard
- Protective/safety measures that the employee can take.
- Measures that Great Arrow has taken to reduce hazards, to include, administrative controls, engineering controls, and personal protective equipment (PPE) required.

5.3 Non-Routine Task:

Due to the nature of construction, chemical use must be considered routine. Chemicals used by Construction Services are to be considered for use consistent with job requirements.

6.0 Chemicals In Unlabeled Pipes:

Prior to beginning any work on unlabeled pipes, employees and contractors shall contact Great Arrow Construction. Specific training regarding potential hazards and safety precautions must be conducted.

6.1 Piping Contents:

The following items may be contained within piping:

- Utility Gas Lines
- Electrical Conduit
- Water Pipe
- Acids
- Chemicals of any Nature

7.0 Multi-Employer Project Work Sites:

It is the responsibility of the designated individual at the Project Work Site to provide contractors and their employees with the information listed below. This information will be given to the contractor's employees prior to their entering the work site.

- a. Hazardous chemicals what they may be exposed to on the work site.
- b. Measures the employee may take to reduce the possible exposure
- c. Steps that Great Arrow has taken to reduce the risks.
- d. MSDS for all hazardous chemicals are on file in the office of Great Arrow Construction, or at the appropriate Project Work Site.
- e. Procedures to follow if they are exposed.
- f. Location of the written plan is the office of Great Arrow Construction.

8.0 List of Hazardous Chemicals:

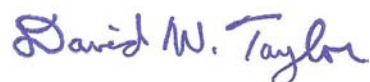
Inventories of hazardous chemicals and materials used at Great Arrow Construction are located at the Office of Great Arrow Construction. Due to the large inventory on various Project Work Sites, individual inventories per location are not attached.

9.0 Great Arrow Construction Policies:

Great Arrow Construction policies set forth in this Hazard Communication Plan are to be adhered to by all employees and contractors working on Great Arrow Property or Project Work Sites. Employees or Contractors found to be knowingly violating the policies set forth will be subject to disciplinary actions, up to and including immediate termination.

Reviewed by:

David W. Taylor



Chief Manager of Great Arrow Construction