



AN ASRC INDUSTRIAL SERVICES COMPANY

TABLE OF CONTENTS

Hazard Communication Program (Minnesota Right-To-Know)

GENERAL INFORMATION AND COMPANY POLICY	1
PURPOSE	
SCOPE	
OBJECTIVES	
PROGRAM COORDINATOR & PROGRAM OVERVIEW	2
CHEMICALS/HAZARDOUS SUBSTANCES	2
Chemical Listings	3
Labels & other forms of Warning	4
SAFETY DATA SHEETS(SDS)	5
EMPLOYEE TRAINING AND INFORMATION	6
HAZARDOUS NON-ROUTINE TASKS	8
HAZARDOUS SUBSTANCES IN UNLABELED PIPES	8
HAZARDOUS PHYSICAL AGENTS	9
INFECTIOUS AGENTS	9
INFORMING SUBCONTRACTORS	10
NOTICE TO ALL EMPLOYEES:	11

Hazard Communication Program

(Minnesota Right-to-Know)

PURPOSE

This program manual is designed to implement the provisions of the Minnesota Employee Right to Know Act of 1983. This manual presents the major aspects of the standards. These standards require employers to evaluate their workplaces for the existence of hazardous substances, harmful physical agents, and infectious agents and to provide training and information to those employees covered under this act who are routinely exposed to those substances and agents.

SCOPE

This Employee Right to Know Program has been developed in accordance to applicable state and federal regulations. It has been approved as the This Employee Right to Know Program will be reviewed for relevant updates by the Safety Committee every two years.

OBJECTIVES

- To safeguard the health of each employee by providing a written guide for compliance.
- To provide employees or any subcontractor's employees performing abatement work and general construction, with the necessary information concerning health and physical hazards of the chemical materials in use at the job site.
- To comply with OSHA's Hazard Communication Regulations (CFR 1910.1200 and 1926.059) and state and local regulations.

PROGRAM COORDINATOR

Safety Director is the person responsible for implementing, reviewing, and updating the program. They will coordinate this effort and train/assist Supervisors and Foremen as necessary. Additionally, they will ensure that all employees who are exposed, or potentially exposed to hazardous chemicals or substances, are informed, trained and made aware of the regulations and of their potential exposures and the means and measures made available to them for their protection.

PROGRAM OVERVIEW

This program will be reviewed periodically to assure that additions and deletions are made where appropriate and that the program is in full compliance with government regulations. The written program includes information on the following:

- CHEMICALS/HAZARDOUS SUBSTANCES
- CONTAINER LABELING
- SAFETY DATA SHEETS (SDS'S)
- EMPLOYEE TRAINING AND INFORMATION
- HAZARDOUS NON-ROUTINE TASKS
- HAZARDOUS SUBSTANCES IN UNLABELED PIPES
- HARMFUL PHYSICAL AGENTS
- INFECTIOUS AGENTS/BLOODBORNE PATHOGENS
- INFORMING SUBCONTRACTOR
- ADDITIONAL INFORMATION

CHEMICALS/HAZARDOUS SUBSTANCES

A chemical is any element, chemical compound or mixture of elements and/or compounds. A hazardous substance is any material or mixture that is a physical or health hazard. Chemicals that are physical hazards mean that they are: COMBUSTIBLE LIQUIDS; COMPRESSED GASES; EXPLOSIVE; FLAMMABLE; ORGANIC PEROXIDES; OXIDIZERS; PYROPHORIC; UNSTABLE (REACTIVE); AND/OR WATER-REACTIVE.

Chemicals that are health hazards include materials that are:

1. Carcinogens (or potential carcinogens), as listed by the National Toxicology Program (NTP) or the International Agency of Research on Cancer (IARC), or regulated by OSHA.
2. Corrosive, causing visible destruction of, or irreversible alteration in, living tissue by chemical action at the site of chemical contact.

3. Highly toxic, as defined in Appendix A of 29 CFR 1910.1200, based on the median lethal dose by various routes of administration.
4. Irritant, not corrosive, but causing a reversible inflammatory effect on living tissue by chemical action at the site of chemical contact.
5. Sensitizer, causing an allergic reaction after repeated exposure.
6. Toxic, again defined by median lethal dose by various exposure routes.
7. Target organ effects, of which a number of examples are given in Appendix A of the actual Hazard Communication Standard.

CHEMICAL LISTING

An up-to-date chemical listing is available to all employees as part of this Program. It is the responsibility of each Supervisor to provide an initial list of hazardous substances at his/her job site, as well as any changes/deletions that occur.

This list will contain all chemicals used or stored on company property, abatement or general construction job site where the SDS can be found. As new products are purchased, they will be added to the hazardous chemical list and reviewed with employees during weekly safety meetings. Safety Director will be responsible for updating the list and issuing updates to the field. At least twice a year, the entire list will be reviewed to ensure that products that no longer used are removed from the list. Any company employee purchasing materials not already on the list will notify their Supervisor.

The following are some of the substances that may be encountered on Mavo Systems, Inc. job sites, and/or shop areas:

1. Asbestos
2. Lead
3. Sentinel 747 – Mastic Remover, Noncombustible liquid.
4. Crystalline Silica
5. Oxygen Cylinders – nonflammable, but supports and vigorously accelerates combustion of flammables.
6. Acetylene, Ethane – extremely flammable and explosive.
7. Steel products in their usual physical form do not pose any health hazards. However, when subjected to welding, burning, grinding, cutting, abrasive blasting, heat treatment, or similar operations potentially hazardous fumes or dust may be emitted.

LABELS AND OTHER FORMS OF WARNING

Since labels and placards are the primary initial source of warning for employees, the requirements of this section of the Standard are very important to the effectiveness of the *overall Hazardous Communication Program*.

Safety Director, through each Supervisor, will ensure that all hazardous chemicals in the workplace are properly labeled and updated as necessary. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer, or other responsible party. The Supervisor on each job shall verify that all containers received for use will:

- Be clearly labeled as to the contents
- Note the appropriate hazard warning
- List the name and address of the manufacturer

Labels on incoming chemicals will not be removed or defaced unless they are immediately replaced with replacement labels containing all required information and consistent with the associated SDS. Transfer containers, other than immediate use containers, will be labeled with the product name and the appropriate hazard warning found on the original container. When there are a number of stationary containers within a work area that have similar contents and hazards, signs will be posted on them to convey the hazard information. When transferring chemicals from a labeled container to a portable container that is intended only for your immediate use, no labels are required on the portable container.

Exceptions

There are two exceptions to the labeling requirement that are applicable to most asbestos abatement sites.

- You may post signs or placards that convey the hazard information if there are a number of stationary containers within the work area that have similar contents and hazards.
- You are not required to label portable containers into which hazardous chemicals are transferred from labeled containers, as long as the employee making the transfer is the only person using the material, which must then be used/emptied by that person during the same shift.

SAFETY DATA SHEETS (SDS)

Safety Director will be responsible for obtaining and maintaining the data sheet system for Mavo Systems, Inc. He will review incoming safety data sheets for new and significant health/safety information. He will maintain a master binder containing a SDS on every substance on the list of hazardous chemicals.

*A Job-specific written safety program will be implemented and maintained at each workplace. A job-specific SDS binder will be also present at each job site location and readily available during all work shifts.

Mavo Safety Director will assure that all chemicals purchased will be subject to an SDS request and updating system. The company will make every effort to get a SDS for every product in use and each SDS will be reviewed for completeness. If the SDS is incomplete or unclear, the manufacturer or importer will be contacted to get clarification on the missing information. If there is not a SDS for a hazardous chemical because the supplier failed to provide one, it will be documented that a good faith effort was made to obtain the SDS.

Subcontractors at job sites may review the site specific SDS binder found at all job sites. Posters announcing the availability of the binder will be prominently displayed at each job site. All other employers are required to check in with Mavo Systems, Inc. supervisory personnel before entering any work area when hazardous chemicals are in use so that they can receive information on the hazards.

Copies of SDS's for all hazardous chemicals are available to all employees in their work area for review during each shift. Please contact your supervisor when working with a chemical or new hazardous substance(s) for which there is no SDS.

The Supervisor on the job will:

1. Maintain a current set of SDS for each hazardous substance used. These can be found in the field office or company vehicle.
2. Provide an SDS to an employee, upon request, during his/her work shift.
3. Be alert to other employers (such as subs) whose work on the job site may expose our employees to additional hazardous substances.

EMPLOYEE TRAINING AND INFORMATION

Employees of Mavo Systems, Inc. will attend a health and safety orientation prior to starting work to receive the proper training in the use and handling of potentially hazardous substances. Whenever a new hazard is introduced, additional training will be provided. At least yearly, a review of the program will take place. Safety Director or an appointed Safety Consultant will be available to answer any questions from workers regarding the program. Training will consist, but not limited to the following:

- An overview of the requirements contained in the *Hazard Communication Program*.
- Chemicals present in the workplace.
- Location and availability of the written *Hazard Communication Program*.
- Physical and health effects of the hazardous substances, including signs and symptoms of exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
- How to lessen or prevent exposure to these hazardous substances through usage of control/work practices and personal protective equipment and clothing.
- Steps the company has taken to lessen or prevent exposure to these substances.
- Emergency and first aid procedures to follow if employees are exposed to hazardous chemicals.
- How to read labels and review SDS's to obtain appropriate hazard information.
- HAZCOM Standard pictogram will be reviewed. See below:

Hazard Communication Standard: Pictograms

As of June 1, 2015, 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. **HCS Pictograms and Hazards**

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

After attending the training class, each employee will sign a form to verify that they attended the training, received written materials, and understand this company's policies on Hazardous Communication.

For all non-English speaking employees training will be provided in their native language to assure a clear understanding of this program by all employees.

HAZARDOUS NON-ROUTINE TASKS

Employees may occasionally be required to perform hazardous, non-routine tasks. It is company policy that prior to the start of work on each project, each affected employee will be provided with information concerning the hazards to which they may be exposed during various activities. This information shall include:

- Specific chemical hazards.
- Protective/safety measures which must be utilized.
- Measures the company has taken to lessen the hazards including ventilation, respirator, and presence of another employee and emergency products.

It is company policy that no employee begins work in a confined space, or on any non-routine task without first receiving a safety briefing from the Supervisor. When required to perform hazardous non-routine tasks (e.g. entering confined spaces, etc.), employees will participate in a special training session to inform them of the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure. This company will require all those attending any training session to sign a form verifying their attendance.

HAZARDOUS SUBSTANCES IN UNLABELED PIPES

Some facilities do not have pipes that are properly labeled to inform workers of the hazardous substances within. To ensure the safety and health of employees that work on unlabeled pipes, the following policy has been established.

Prior to the start of work on unlabeled pipes, employees are to contact their supervisor for the following information:

- The type of hazardous substance in the pipe.
- Potential hazards, if any, to the employee.
- Safety precautions that should be taken.

Reaction vessels, storage tanks, pipes, etc. shall be labeled with the identity of their contents and the hazards they present, if any. Where permanent labels are impractical, placards shall be used. Where appropriate, all pipes and process lines whose contents and direction of flow are not obvious from the equipment served shall be appropriately placarded so that the placards are visible at access points.

HARMFUL PHYSICAL AGENTS

Mavo Systems, Inc. recognizes the list of harmful physical agents listed/inventoried below. The employer will exercise reasonable diligence in evaluating the workplace for the presence of recognized harmful physical agents at a level that may be expected to approximate or exceed the permissible exposure limit or the applicable action level. The employer understands that the list/inventory of harmful physical agents includes the majority of harmful physical agents that will be encountered in Minnesota (or other states). The employer will make a diligent effort to ensure that this list is updated as necessary. Mavo Systems, Inc. will ensure that exposed employees are afforded their rights as established in the Employee Right to Know rules.

Harmful Physical Agents in the work place include:

- 1) Heat
- 2) Noise
- 3) Ionizing Radiation
- 4) Nonionizing Radiation

LABELING

Mavo Systems, Inc. will ensure that equipment or work areas that specifically generate harmful physical agents at a level that may be expected to approximate or exceed the permissible exposure limit or applicable action will be labeled, marked or tagged. Labeling will include:

- 1) The name of the physical agent.
- 2) The appropriate hazard warning.

INFECTIOUS AGENTS

Mavo System, Inc. will exercise reasonable diligence in evaluating the workplace for the presence of recognized and other infectious agents including bloodborne pathogens. The employer understands that the list of infectious agents includes the majority of communicable infectious agents that could be encountered in Minnesota. The employer will make a diligent effort to ensure that the most current list is provided in this program. Mavo Systems, Inc. will ensure employee who is exposed are provided with the rights established in the Employee Right to Know rules.

INFORMING SUBCONTRACTORS

The Supervisor is responsible for advising outside contractors, in person, of the following:

- Any chemical hazards to which they may be exposed during the normal course of their work on the premises.
- The labeling system in use.
- The safe handling procedures to be used and precautions the employees may take to lessen the possibility of exposure by using the appropriate protective equipment and clothing.
- The location and availability of the SDS.

It will then be the responsibility of each contractor on a job site to ensure the work safety of other contractors and their employees. Our company will make available to other contractors the following information upon request:

- Hazardous substances to which workers may be exposed to while on the specific job site.
- Precautions that workers are to take to lessen the possibility of exposure by usage of appropriate measures.

Additionally, other contractors should make available to Mavo Systems, Inc.'s management the same information. Any outside contractor bringing chemicals on site must provide the company with the appropriate hazard information on these substances, including the labels used and the precaution measures to be taken in working with these chemicals.

NOTICE TO ALL EMPLOYEES
HAZARD COMMUNICATION PROGRAM

About one in four of the nations workforces are exposed to one or more chemical hazards. There are an estimated 575,000 existing chemical products and hundreds of new ones being introduced annually. Chemical exposure may cause or contribute to many serious health effects such as heart ailments, kidney and lung damage, sterility, cancer, burns, and rashes. Some chemicals may also be safety hazards and have the potential to cause fires, explosions and other serious accidents.

In an effort to reduce the source of chemical illnesses and injuries to our employees, and to comply with OSHA's "**Hazard Communication**" (29 CFR 1910.1200) and **Minnesota "Right-to-Know"** standard, Mavo Systems, Inc. is making available its written *Hazard Communication* or *Minnesota Right-to-Know* program. **Christopher Schmitt**, has been given the responsibility of carrying out this program.

We want all employees to know:

1. That a Hazard Communication – Right-to-Know program exists.
2. The hazards have been evaluated and properly labeled.
3. That employee information and training is available through Supervisors.
4. That we are concerned about the health and safety of every employee.

There will be an initial inventory of all hazards on all job sites. Each potential hazard will be identified and recorded on a list. It will be every supervisor's responsibility to keep the list current and include the proper Safety Data Sheet (SDS) for each product. The book will be kept in either the field office or Supervisor's truck.

CM Schmitt, Director HSET

Date