COMPANY NAME

HAZARD COMMUNICATION MANUAL

Table of Contents

I. OBJECTIVE

The objective of Electric City Utilities Hazard Communication Program is to comply with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard, 29 CFR 1910.1200, to ensure information about the dangers of all hazardous chemicals used by Electric City Utilities is known by all affected employees and to ensure safe handling procedures and measures are used to protect employees from these chemicals.

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Every department and employee will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the front office for review by any interested employee.

II. ASSIGNMENT OF RESPONSIBILITIES

a. Program Administrator
   Water Operations Manager will manage the Hazard Communication Program for Electric City Utilities, maintain all records pertaining to the plan, including reviewing and updating this plan as necessary and facilitate training.
b. Management
   Electric City Utilities will ensure each employee understands and follows the Hazard Communication Program through employee orientation, training, job performance reviews and disciplinary action. Electric City Utilities will provide all necessary information, equipment and personnel to comply with this program.
c. Supervisors
   Supervisors should ensure their employees are trained in and use proper work practices, chemical labels, SDSs, personal protective equipment, and proper cleanup procedures regarding leaks and spills.
d. Employees
   Employees are responsible for employing proper work practices, using personal protective equipment, understanding chemical labels & SDSs and cleanup/disposal procedures as described in this plan. Employees are also responsible for reporting all exposure, leak and spill incidents to Water Operations Manager immediately or as soon as possible.
e. Contractors
   Contract employees will be responsible for complying with this plan and will be responsible for providing the training described herein.

III. CONTAINER LABELING

a. Water Operations Manager will verify that all containers of classified hazardous chemicals in the workplace are clearly and prominently labeled, in English, with the following information:
   i. Product Identifier or name;
   ii. Signal Word to indicate the level of severity of hazard and alert the reader to a potential hazard;
   iii. Hazard Statement which describes the nature of the hazard(s) of the chemical;
   iv. A Pictogram, conveying in a graphic element, specific information about the hazards of the chemical;
   v. Precautionary Statement(s) which describe recommended measures to take to prevent adverse effects resulting from exposure or improper storage or handling;
   vi. The name, address and telephone number of the chemical manufacturer, importer or other responsible party.

b. On the following individual stationary process containers, we are using the ***Description of Identifying System Used*** labeling system to convey the required information: ***List Containers Here***

c. Water Operations Manager will review the company labeling procedures every six months and will update procedures as well as labels as required.

IV. HAZARDOUS CHEMICALS LIST

a. The hazardous chemical inventory list is compiled and maintained by Water Operations Manager.

b. The list of all known hazardous chemicals used by our employees or, stored in this facility, is attached to this plan (appendix A) and kept in the Warehouse. This list includes the name of the chemical, the manufacturer, the work area in which the chemical is used, dates of use, and quantity used. Further information on each chemical may be obtained from the SDSs, located in the Warehouse.

c. When new chemicals are received, this list must be updated (including date the chemicals were introduced). To ensure any new chemical is added in a timely manner, the following procedures should be followed:
   i. Water Operations Manager must be notified of all chemicals ordered in every department of Electric City Utilities. Date order was placed, name of the chemical, the manufacturer, the work area in which the chemical will be used, dates of expected use, quantity to be used and expected ship date must be conveyed to him/her.

ii. When shipment arrives, receiving department must notify the Water Operations Manager immediately and deliver to him/her the new SDS and any additional information on the chemical provided with shipment.

iii. Water Operations Manager must then add new chemical to list with all required information. An updated copy must then be attached to this plan and the old list destroyed.

V. SAFETY DATA SHEETS

a. Water Operations Manager is responsible for establishing and monitoring the company SDS program. He/she will ensure procedures are followed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. Water Operations Manager will see any new information is communicated to affected employees. He/she will keep a master file of all SDSs with this plan in his office. The procedure below will be followed when an SDS is not received at the time of initial shipment.

i. Receiving department should notify Water Operations Manager immediately upon arrival of shipment that SDS was not received.

ii. Water Operations Manager must contact the chemical manufacturer, distributor or shipper and request the SDS be emailed or faxed immediately.

iii. If unable to obtain SDS via the manufacturer, distributor or shipper, Water Operations Manager should search online for a current SDS on the chemical(s) in question. (The University of Vermont has a web site that contains SDSs on almost every known chemical. Go to http://hazard.com/msds/)

b. Paper copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the following location(s): Warehouse and Manager's office. (Note: If an alternative to paper copies of SDSs is used, describe the format and how employees can access the SDSs.)

c. SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact Water Operations Manager.

d. When revised SDSs are received, the following procedures will be followed to replace old SDSs:

i. Water Operations Manager should review new SDS master and compare to SDS master being replaced. Changes should be noted on separate sheet and attached to old SDS master. File old master SDSs with noted changes. If changes are significant enough to

warrant new training, Water Operations Manager should provide training as outlined in this manual.

ii. Water Operations Manager should make necessary copies for all SDS locations.

iii. Water Operations Manager should replace old SDSs with new SDSs at all SDS locations. Old SDSs should be destroyed.

VI. EMPLOYEE TRAINING AND INFORMATION

a. Water Operations Manager is responsible for the Hazard Communication Program and will ensure all program elements and training are carried out. Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will attend a health and safety orientation on the hazard communication standard and this plan. All training will be interactive and will include the following:

- An overview of the OSHA hazard communication standard;
- The hazardous chemicals present at his/her work area;
- The physical and health risks of the hazardous chemicals;
- Symptoms of overexposure;
- How to determine the presence or release of hazardous chemicals in the work area;
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment;
- Steps Electric City Utilities has taken to reduce or prevent exposure to hazardous chemicals;
- Procedures to follow if employees are overexposed to hazardous chemicals;
- How to read labels and SDSs to obtain hazard information; and
- Location of the SDS file and written Hazard Communication program.

b. Prior to introducing a new chemical hazard into any department or area of Electric City Utilites, each employee in that section will be given information and training as outlined above (section VI subsection A) for the new chemical hazard.

c. Annual retraining of the hazard communication program is required for all employees.

VII. HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform non-routine tasks which are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting work on such projects, each affected employee will be given information by Water Operations Manager about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps Electric City Utilities is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures. For a list of possible non-routine tasks performed by employees of Electric City Utilities see Appendix B.

VIII. OTHER EMPLOYER/CONTRACTORS

a. Any time an outside contractor brings a hazardous substance into Electric City Utilities, a SDS and any additional information for the substance must be received by Water Operations Manager. Similarly, a SDS and any additional information for all hazardous substances in the area in which the contractor will be working must be provided to the contractor. This exchange will be coordinated by Water Operations Manager.

b. Service contractors whose work or materials pose a health hazard to Electric City Utilities employees will be responsible for the training and education requirements outlined under the training section of this program. Water Operations Manager must attend training sessions and ensure Electric City Utilities employees are properly trained.

c. In addition to providing copies of SDSs to other contractors, other contractors will be informed of necessary precautionary measures to protect their employees exposed to operations performed by Electric City Utilities. Outside contractors will be responsible for training their employees.

d. Also, contractor's employees will be informed of the hazard labels used by Electric City Utilities.

e. Outside contractors must comply with all provisions of the hazard communication standard while working for Electric City Utilities.

f. All training must be documented and kept on file with the Hazard Communication Program File.

IX. CHEMICALS IN UNLABELED PIPES

a. Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee should contact Water Operations Manager for information regarding:

   i. The chemical in the pipes;

   ii. Potential hazards; and

   iii. Required safety precautions.

b. Include here the chemical list developed during the inventory. Arrange this list so that you are able to cross-reference it with your SDS file and the labels on your containers. Additional useful information, such as the manufacturer's telephone number, an emergency number, scientific name, CAS number, the associated task, etc., can be included.

X. PROGRAM AVAILABILITY

A copy of this program will be made available, upon request, to employees and their representatives.