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## 1. PROGRAM REQUIREMENTS.

BRI Roofing & Sheet Metal will ensure that the hazards of all chemicals used at our job sites are evaluated and that information concerning their hazards is transmitted to all employees. The purpose of this program is to address the issues of evaluating the potential hazards of chemicals, communicating information concerning these hazards, and establishing appropriate protective measures for employees. This program will be maintained in accordance with 29 CFR 1910.1200 and updated annually or as required. BRI Roofing & Sheet Metal will make the written hazard communication program available to all employees, during each work shift.

## 2. RESPONSIBILITY.

The Safety Manager is the program coordinator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Manager has full authority to make necessary decisions to ensure success of the program. BRI Roofing & Sheet Metal will submit a copy of this program to any Prime or General Contractor upon request. Supervisors are required to be familiar with the contents of this program, will ensure the program is followed by their subordinates on a daily basis, and will maintain a copy of the program and MSDS's available for their subordinates.

## 3. TRAINING REQUIREMENTS.

BRI Roofing & Sheet Metal will provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, annually, and whenever a new chemical is introduced into their work area that could present a potential hazard.

## 3.1. Information. BRI Roofing &amp; Sheet Metal employees will be informed of:

3.1.1. The OSHA standard 29 CFR 1910.1200.

3.1.2. Any operations in the jobsite where hazardous chemicals are present.

- 3.1.3. The location and availability of the written hazard communication program, including a list(s) of hazardous chemicals used at the jobsite, and the associated material safety data sheet (MSDS).
- 3.2. Training. Employee hazard communication training at BRI Roofing & Sheet Metal will be conducted annually by the Safety Manager or an approved training provider. Newly hired personnel will be briefed on the general requirements of the OSHA hazard communication standard, as well as duty specific hazards before they begin any duties at a new jobsite. This training will include at least the following:
  - 3.2.1. Methods that may be used to detect the presence or release of a hazardous chemical in the work area. This will include; any monitoring conducted by BRI Roofing & Sheet Metal, continuous monitoring devices, visual appearance, or odor of hazardous chemicals when being released, etc. Material Safety Data Sheets (MSDS) will be used to augment this requirement where ever possible.
  - 3.2.2. The physical and health hazards of the chemicals present in the work area (e.g., flash point, reactivity, toxicity).
  - 3.2.3. The measures employees can take to protect themselves from these hazards. Specific procedures BRI Roofing & Sheet Metal has implemented to protect employees from exposure to hazardous chemicals, to include; appropriate work practices, programs, emergency procedures, and personal protective equipment.
  - 3.2.4. An explanation of the labeling system used at BRI Roofing & Sheet Metal, the material safety data sheet, and how employees can obtain and use the appropriate hazard information.
  - 3.2.5. The chemical (formal) and common name(s) of products used, and all ingredients which have been determined to be health hazards.
  - 3.2.6. The primary route(s) of entry: inhalation, absorption, ingestion, injection, and target organs.
  - 3.2.7. The OSHA permissible exposure limit, ACGIH Threshold Limit Value, including any other exposure limit used or recommended by the chemical manufacturer.
  - 3.2.8. Whether the hazardous chemical has been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC).
  - 3.2.9. Any generally applicable precautions for safe handling and use which are known including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and procedures for clean up of spills and leaks.
  - 3.2.10. Emergency and first aid procedures.
- 3.3. Documentation. All training will be documented using an attendance roster. Certificates of completion will be issued to attendees by the Safety Manager and a copy of the completed certificate filed.

**4. LABELING REQUIREMENTS.**

Labeling requirements of containers of chemicals used at BRI Roofing & Sheet Metal, as well as of containers of chemicals and hazardous materials being shipped off site. The following procedures apply:

- 4.1. Unmarked Containers. Employees of BRI Roofing & Sheet Metal will not use unmarked containers containing chemicals.
- 4.2. Container Labeling. BRI Roofing & Sheet Metal will ensure all containers are properly labeled and will provide labels to any employee requesting. Employees will ensure that labels on containers of hazardous chemicals are not removed or defaced. Once they are emptied, chemical containers can never be used in the place of any other container (for example, trash receptacles).
- 4.3. All container labels will list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer, or other responsible party.

**5. MATERIAL SAFETY DATA SHEETS AND HAZARDOUS MATERIALS INVENTORY LIST.**

The Safety Manager is responsible for obtaining MSDS's for every chemical used by BRI Roofing & Sheet Metal. The Safety Manager will maintain a master copy in the main office. In addition, the Safety Manager will review the MSDS's for all chemicals used to determine if additional precautions or special personal protective equipment will be required in order to ensure employee safety.

- 5.1. Supervisors will be responsible to maintain readily accessible copies of the MSDS's at the job sites and to ensure that all employees are aware of the location. The MSDS binder will be stored in the Supervisors Truck, Job Trailer, or other appropriate area that will ensure employee access at all times.
- 5.2. MSDS requests. Where MSDS's are not received with the product the Safety Manager will request by telephone, fax, or letter a copy of the MSDS from the Manufacturer.
- 5.3. Hazardous Substances inventory. The Company maintains an inventory of all known hazardous substances in use on the job site. A chemical inventory list is available from the Safety Manager.
- 5.4. Hazardous substances brought onto the job site by the company will be included on the hazardous chemical inventory list as part of this program or in a separate MSDS log for specific job information.

**6. NON-COMPANY EMPLOYEES PROGRAM.**

Visitors, Contract Employees, and Contractor Personnel. The Safety Manager and/or Supervisor will advise visitors, contract employees, and contractor personnel of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and availability of MSDS's. Any subcontractor bringing chemicals on-site must provide BRI Roofing & Sheet Metal with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

**7. TRADE SECRETS.**

To protect trade secrets, the chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name, and other specific identification of a hazardous chemical, from the material safety data sheet. To ensure the safety of our employees, BRI Roofing & Sheet Metal will obtain any information not shown on a MSDS from a supplier, when such information is needed to determine the hazardous constituents of chemicals used within our facility or by our employees. BRI Roofing & Sheet Metal employees will not use a specific chemical, if they cannot determine from the MSDS (or other approved source) proper protective measures to be used.

**8. NON-ROUTINE TASKS.**

No employee will be allowed to perform tasks that they are not fully trained to accomplish. Non-routine tasks will be evaluated prior to beginning work and the related hazard assessed to develop protective measures. Any hazards associated with the non-routine tasks will be documented on a JSA.

**9. CHEMICAL STORAGE.**

BRI Roofing & Sheet Metal will ensure that proper storage locations are provided to employees using chemicals. Flammable chemicals will be stored in approved locations or flammable liquids cabinets designed in accordance with 29 CFR 1910.106. Toxic and corrosive chemicals will be stored apart from flammable chemicals and will be further segregated according to acidity and/or alkalinity. All chemical storage location will be approved by the Safety Manager before use.