



HAZARD COMMUNICATION PROGRAM

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1. Objective

The objective of this program is to set forth policies and procedures concerning Hazard Communication which will enhance the safety and wellbeing of HGI employees. Furthermore, execution of this program is designed to help HGI comply with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (29 CFR 1910.1200) and California's Hazard Communication (HazCom) Regulation (T8 CCR 5194).

2. Assignment of Responsibility

The Chief Executive Officer (CEO) is responsible for the implementation and enforcement of this program. The HGI Business Coordinator, based out of the Duluth, GA office, shall be the Program Coordinator and specifically maintain and keep up to date the Hazardous Chemical List as well as the SDSs. Both shall respond to the requests and concerns of employees of HGI.

In the work-from-home office setting, it will be the responsibility of the individual HGI employee to collect and maintain any Safety Data Sheets (SDS) specific to their work environment as well as keep them on hand either digitally or in hard copy.

3. Listing of Hazardous Chemicals and Substances

A listing of Hazardous Chemicals and Substances used in the course of business activities shall be maintained by the Program Coordinator. This list is to include all substances that require a Safety Data Sheet (SDS). The initial chemical inventory is developed by conducting a physical survey of the Duluth office. All cleaning agents, solvents, lubricants, adhesives, inks, toners, and other materials, substances, or chemicals are included in the inventory list. New chemicals, substances, or materials, which are brought into the office must be added to the inventory list. This listing applies to any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

Subsequent physical inventories will be conducted and documented in **January** of each year.

A list of Hazardous Chemicals and Substances will be documented for the purpose of this program and will be maintained as **Exhibit A** in this written program. The Hazardous Communications Program, along with this list, will be located in the copy room/area in such a manner that it will always be available to employees within the office.

4. Safety Data Sheets

Safety Data Sheets (SDS) are the underlying foundation of the Hazard Communication Program implementation. SDSs may be obtained for all substances and chemicals found in the work environment which appear to or actually pose a health or safety hazard to employees who are exposed or potentially exposed to them.

4.1. Obtaining SDSs

All hazardous chemicals or substances should be received with an SDSs. To add new substances or chemicals to HGI's inventory of SDS (see 4.3 below), add the substance or chemical to the List Hazardous Chemical Substances (Exhibit A) and file a hard copy of the SDS within this Program manual.

If a hazardous chemical or substance is received without a proper SDS, the receiving person will immediately notify the Program Coordinator who will immediately contact the manufacturer or distributor of the product to obtain a copy of the SDS. If the manufacturer or distributor is unable to produce an SDS, the current SDS can often be found on the manufacturer's web site.

(Note: Material Safety Data Sheets (MSDSs) cannot be used after June 1, 2015.)

4.2. Evaluation and Description of Hazards

All SDSs must be reviewed by the CEO or his/her designated representative upon receipt. The CEO shall also establish, based on the information supplied on the SDS:

- The appropriate handling of the material, including any required personal protective equipment (PPE) or other protective measures
- Whether the material is sufficiently different from other materials listed on the SDS Master List to require additional employee training / retraining

4.3. Maintaining Safety Data Sheets

SDSs shall be maintained along this written program, preferably using the List of Hazardous Chemical Substances (Exhibit A) as an index. As obsolete SDSs are replaced by updated copies, the obsolete SDSs will be retained for 30 years.

5. Labeling and Pictograms

Each container of a hazardous chemical must be properly labeled with the identity of the hazardous material, the appropriate hazard warnings, pictogram(s), signal word(s), and the name and address of the manufacturer. Appropriate labels must be on all containers, regardless of size. Containers must be approved and evaluated 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 Program Coordinator to ensure that appropriate labels are in place and that replacement labels are available.

All containers, even those for transfers of product (other than those intended for the immediate use of the employee who performs the transfer and manages the container) must be labeled with the product name found on the original container along with the appropriate hazard warning found on the original container sent by the manufacturer.

HGI does not allow any unlabeled containers in the workplace – all products shall be in its original container and not bought in ‘bulk’ and then transferred to smaller generic containers.






5.1. Label Elements

The following elements are required on labels of hazardous chemicals:
[See **Exhibit C** as an example with all Labeling requirements.]





- **Name, Address, and Telephone Number** of the chemical manufacturer, importer, or other responsible party.
- **Product Identifier** is how the hazardous chemical is identified. For example, this could be the chemical name, code number, or batch number. The same product identifier must be both on the label and in section 1 of the SDS.
- **Signal Words** are used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, “danger” and “warning.” Within a specific hazard class, “danger” is used for the more severe hazards and “warning” is used for the less severe hazards.
- **Hazard Statements** describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: “Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.”
- **Precautionary Statements** describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statements:
 - Prevention (to minimize exposure)
 - Response (emergency response and first-aid in case of accidental spillage or exposure)
 - Storage
 - Disposal

• Pictogram(s)

◦ Physical Hazards:

Pictogram	Pictogram Name	Hazard
	Explosion Bomb	<ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
	Flame	<ul style="list-style-type: none"> • Flammables (Solids, Liquids, Gas) • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides
	Flame Over Circle	<ul style="list-style-type: none"> • Oxidizers (Solids, Liquids, Gas)
	Gas Cylinder	<ul style="list-style-type: none"> • Gases Under Pressure
	Corrosion	<ul style="list-style-type: none"> • Corrosive to Metals

◦ Health Hazards:

Pictogram	Pictogram Name	Hazard
	Skull and Crossbones	<ul style="list-style-type: none"> • Acute toxicity (fatal or toxic)
	Corrosion	<ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage
	Exclamation Mark	<ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant
	Health Hazard	<ul style="list-style-type: none"> • Carcinogen • Respiratory Sensitizer • Reproductive Toxicity • Target Organ Toxicity/STOT • Mutagenicity • Aspiration Hazard

6. Employee Access

Employees must be informed of the requirements of the "Hazard Communication" Standard and their means of access to pertinent information in the event of a spill or contact/exposure of a chemical or substance in the workplace.

All employees must be informed of where all relevant information, including the availability of this written program, will be found (office's copy room/area). The employees shall also be informed that the required list of hazardous chemicals and substances (**Exhibit A**) will also be located within this written program.

Employees will also be informed that additional information, when requested in writing, will be made available to the requesting party, if such information is available and is not subject to secrecy restrictions regarding its passage to a third party. This request form is located in **Exhibit B**.

7. Education and Training

HGI shall provide its employees with education and training in hazardous chemicals and harmful agents in their work area at the time of their initial assignment and when a new hazard is introduced into their work area. In addition to the training of new employees, and the pre-assignment training of employees who are being exposed to new hazards, there will be training of all current employees on an annual basis.

7.1. Determination of Employees to be Trained

All HGI employees will be trained on all the content listed in this section of the Program. Contractors not under HGI's direct supervision must provide their own appropriate employee training.

7.2. Content of Training Program

The information and training requirements of the Hazard Communication Standard include:

- The existence and content of the Hazard Communication Standard.
- The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets required by the Hazard Communication Standard.
- The concept and use of a sample material safety data sheet (SDS).

- Review of any operations in their work areas where hazardous chemicals may be present.
- Identify operations common to most areas where hazardous chemicals are present, and the physical and health hazards.
- If additional information is requested, it must be done in writing, using the request form in **Exhibit B**.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).
- The physical and health hazards of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

7.3. When Training Is To Be Conducted

- All employees will be trained during the onboarding process
- Annual training of all current employees

7.4. Updating of Training Program

The training program shall be reviewed annually by the CEO to assure that all necessary updates to the program are made in an accurate and timely fashion.

7.5. Training Responsibilities

It shall be the responsibility of the CEO to assure that all employees receive appropriate training as outlined herein.

7.6. Training Procedures

The training will be based around a Hazard Communication Training PowerPoint presentation as well as the review of this program.

7.7. After the employee completes the Program

The employee's supervisor should be sure to review the program briefly with the employee to ensure that they understood it and are comfortable with the material presented in the program.

8. Storage

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

9. Non-Routine Task Hazard Appreciation

Employees will be instructed as to the type of tasks or work environments which may from time to time occur which are out of the ordinary, and which will require further information. Specifically, it is the policy of HGI that tasks performed by employees which are out of the ordinary and not part of the day to day routine are to be cleared with the employee's supervisor prior to his/her performance of them.

10. Program Compliance

Any direct or intentional violation or non-compliance with this program may result in the termination of the person or persons involved in accordance with company policy.

It is not the policy of this company to train and educate the employees of another employer except in circumstances or in situations where HGI's personnel directly supervise the contractor's employees.

It is the policy of this company to adequately apprise the employees of contractors, through their employer, as to the specific substances which they may be exposed to during the normal course of events, and in foreseeable emergencies. Therefore, contractors whose employees may be exposed to chemical substances in our facility will be given access to SDSs for each material, chemical, and/or substance which is hazardous and which can present a hazard to that employee while he or she is in our facility.

It shall be the responsibility of the CEO to ensure that all contractors working on HGI controlled property have been properly advised of our policy as described above.

Exhibit A – List of Hazardous Chemical Substances

Reference Number	Product Name (matching Label and SDS)	Manufacturer	Work Area used	SDS Date
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Exhibit B – Employee Information Request form

Employee Information Request Form, page 1 of 2

This form is provided as a part of HGI’s safety program. This form should be used after a verbal request for information is made to your immediate supervisor, when additional information is desired.

1. Please Print:

Employee Name _____ Department _____
Job Title _____ Work Location _____
Supervisor _____ Phone Number _____

2. Describe the chemical substance for which information is requested (Trade Name).

Chemical Name (if known) _____

Manufacturer’s Name and Address (if known)

Manufacturer’s Phone Number:

3. Does the substance have a label: Yes No

4. What is the physical form of the substance?

Gas Liquid Solid Dust

5. Any other information which will help identify the substance.

Signature _____

Date _____

Exhibit C – SAMPLE LABEL

PRODUCT IDENTIFIER

CODE

Product Name

SUPPLIER IDENTIFICATION

Company Name

Street Address

City State

Postal Code Country

Emergency Phone Number

PRECAUTIONARY STATEMENTS

Keep container tightly closed. Store in cool, well ventilated place that is locked.

Keep away from heat/sparks/open flame. No smoking.

Only use non-sparking tools.

Use explosion-proof electrical equipment.

Take precautionary measure against static discharge.

Ground and bond container and receiving equipment.

Do not breathe vapors.

Wear protective gloves.

Do not eat, drink or smoke when using this product.

Wash hands thoroughly after handling.

Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or carbon dioxide (CO₂) fire extinguisher to extinguish.

First Aid

If exposed call Poison Center.

If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

HAZARD PICTOGRAMS



SIGNAL WORD

Danger

HAZARD STATEMENT

**Highly flammable liquid and vapor.
May cause liver and kidney damage.**

SUPPLEMENTAL INFORMATION

Directions for use

Fill weight: Lot Number

Gross weight: Fill Date:

Expiration Date:

Exhibit D – SECTIONS ON A SAFETY DATA SHEET

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format that must include the section numbers, headings, and associated information listed below:

Section 1, Identification

Includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; and restrictions on use.

Section 2, Hazard(s) identification

Includes all hazards regarding the chemical and required label elements.

Section 3, Composition/information on ingredients

Includes information on chemical ingredients and trade secret claims.

Section 4, First-aid measures

Includes important symptoms/effects, including acute or delayed and required treatment.

Section 5, Fire-fighting measures

Lists suitable extinguishing techniques and equipment and chemical hazards from fire.

Section 6, Accidental release measures

Lists emergency procedures; protective equipment; proper methods of containment; and cleanup.

Section 7, Handling and storage

Lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection

Lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; and personal protective equipment.

Section 9, Physical and chemical properties

Lists the chemical's characteristics.

Section 10, Stability and reactivity

Lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information

Includes routes of exposure; related symptoms including acute and chronic effects; and numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information

Includes the date of preparation or last revision.

Employers must ensure that SDSs are readily accessible to employees.

See Appendix D of 29 CFR 1910.1200 for a detailed description of SDS contents.

***Note:** Since other agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 of 29 CFR 1910.1200(g)(2).