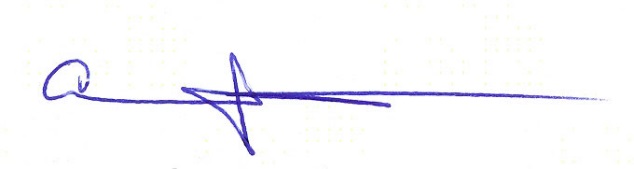
Safety Policy Manual

Hazard Communication Policy



Approved:

Ahmed Boomrod, CEO/President

Approved:

Michael G. Cadotte, VP Safety & Quality

**Change Record**

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| Rev.: | Date: | Responsible Person: | Description of Change: |
| 0 | 01/07/03 | M. Cadotte/Director of Admin. | Initial Release |
| 1 | 04/10/03 | M. Cadotte/Director of Admin. | Addition of Sections 4.6 (Hazardous Material List), 4.5 (Pipes & Piping Systems) and 4.7 (Non-Routine Tasks) |
| 2 | 04/14/03 | M. Cadotte/Director of Admin. | Addition of Section 4.8 |
| 3 | 05/17/07 | M. Cadotte | Changes to Section 4.7.3 Blood Borne Pathogen Cleanup Policy |
| 4 | 08/13/09 | M. Cadotte | Creation of Sec. 4.3.5 MSDS Audit Policy |
| 5 | 10/04/2011 | M Cadotte | Reference change: MSDS to SDS / annual audit of policy. |
| 6 | 04/10/2012 | M Cadotte | New section inserted as 4.2 – Chemical Disposition |
| 7 | 2/7/2014 | M Cadotte, VP Safety & Quality | Update to reflect SDS Global Harmonization |
| 8 | 04/10/15 | Audit | Annual Audit. Changes in naming, responsible party and §4.7 and addition of §4.11 |
| 9 | 11/30/15 | M Cadotte | Enhanced spill containment information in section 4.10 |
| 10 | 02/10/17 | M Cadotte | Annual Audit: added 4.1.2.1 and changes to 4.4.1 |
| 11 | 08/29/2018 | M Cadote | Review |
| 12 | 01/22/2020 | M Cadotte | Audit |
| 13 | 8/28/2020 | M Cadotte | Inclusion of PSM – NEW SEC 4.12 |

1. **Purpose**

To establish a written policy for hazard communication for GDI Services Inc. (GDI or GDI – US) that is in compliance with OSHA and State OSHA departments.

1. **Scope**

The following hazard communication policy is established for ALL GDI - US’s employees and will be made available to all employees through:

* HR Department
* Jobsite Postings
* Safety Department

1. **Responsibility**
   1. Vice President of Safety - Has overall authority and responsibility for implementing and monitoring safety programs at GDI Services Inc.
   2. Safety Committee - Is responsible for monitoring the safety program, developing training schedules, researching new safety products and coordinating all safety related efforts within the company.
   3. Employees - Each and every employee at GDI - US has a primary responsibility to comply with all safety policies, guidelines and laws. Furthermore, every employee must report any unsafe condition and/or incident to their supervisor immediately.
2. **Procedure**
   1. Hazard Determination
      1. GDI will rely on Safety Data Sheets obtained from our product suppliers to meet hazard determination requirements.
      2. SDS will be placed on each jobsite and made available to employees.
         1. SDS books shall be limited to those chemicals at the job site or are reasonably expected to be at the site periodically.
      3. Employees will not bring non-authorized products to the jobsite nor will an employee mix various products not intended to be mix/without authorization.
   2. Disposition of Chemical
      1. GDI - US shall follow all local, state and federal regulations and law in regards to the disposition of chemical (used, mixed or concentrated).
      2. Chemical requiring disposal shall be (unless required by law to be disposed of in a specific manner different from 4.2.2) done in sanitary drains such as custodial sink / drain or commodes.
      3. No chemical, solution with chemical or water containing soils from cleaning shall be disposed on ground surfaces, exterior paved surfaces or any type of storm drain or other drain that bypasses sanitary sewer systems.
      4. When disposing of chemical employees shall maintain standard PPE for chemical handling to include as a minimum hand protection and eye protection.
   3. Labeling
      1. The site coordinator or area coordinator will be responsible for seeing that all containers entering the jobsite are properly labeled.
      2. Each employee is also responsible for ensuring that all portable containers used in their jobsite are labeled with the appropriate identity and hazard warnings and placed in authorized/approved containers or dispensers. Failure to label and/or report missing labels on product(s) will result in disciplinary action(s).
      3. All labels shall be checked for:
         1. Identity of material
         2. Appropriate hazard warning for the material when appropriate
   4. Safety Data Sheets (SDS)
      1. The Purchasing Department will be responsible for compiling and maintaining a master SDS file. The file will be kept at primary regional office (MI, PA or IL) in the Purchasing Department.
      2. Each jobsite will have its own SDS book available to employees. SDS will be available for review to all employees during each work shift. Copies will be available upon request to an employee’s immediate supervisor or the Vice President of Safety.
      3. SDS Books at the job site level shall be unique to the chemicals utilized at the specific job site. Under no circumstances shall a general ‘catch-all’ SDS book be placed at the job site as it primary SDS manual.
      4. SDS notification/information posters will be posted on the jobsite directing employees to the location where the SDS book is located for that location.
      5. If required SDS is not received, the Purchasing Department shall notify the appropriate vendor for compliance. Failure of a vendor to comply after two (2) requests will result in notification to (Local or Federal) OSHA’s Occupational Health Division or General Industry Safety Division for assistance.
      6. Auditing – annually each jobsite shall audit their SDS book and verify that the SDS on file are the most recent revision. A revision log should be kept with the SDS book as an audit trail for verification of this policy.
   5. Training
      1. The HR Department shall conduct the following safety related training prior to an employee entering the jobsite:

* Blood borne pathogen
* SDS policy
* Review of hazard communication/safety policies
* Employee shall be informed that:

- **The employer is prohibited from discharging or discriminating against an employee who exercises their right to obtain information regarding hazardous chemicals used in the workplace.**

* + 1. The job site manager/coordinator/trainer shall
       1. review all jobsite related safety issues with employees. On a regular basis employees will be given safety reviews on specific safety issues for the benefit of the employee as a refresher.
       2. SDS training will be reviewed annually.
       3. Each job site shall review specific chemicals and their SDS.
  1. Pipes and Piping Systems
     1. Information on the hazardous content of popes and piping systems will be identified by the owner(s) of the facility(s) we service or lease space from (our offices) since GDI does not manage or own its own office facilities. For employee’s reference, the ANSI A13.1-1981 recommends the following colorations: blue for low-medium oxygen and compressed air lines, yellow for variable-high pressure oxygen and compressed air lines, and yellow for acetylene and natural gas lines.
  2. List of Hazardous Chemicals
     1. A list of dangerous chemicals shall be posted at job sites where such chemicals are in use.
     2. All chemicals used (frequently or infrequently) shall be part of the posted site SDS book.
  3. Hazardous Non-routine Tasks
     1. In the event employees are required to perform non-routine tasks (i.e., enter confined spaces), each employee will be given information about the hazards of the area or procedure prior to starting such work. This information would include (a) specific chemical hazards, (b) protection/safety measures the employee can take, and (c) measures GDI has taken to eliminate or control the hazard (i.e., ventilation requirements, use of respirators, use of monitors, or emergency procedures).
     2. Currently GDI does not engage in any non-routine tasks that pose such a hazard, but the above policy is in effect for any segregated and unique task that may occur.
     3. Blood borne pathogen cleanup is to be performed by GDI personnel using the ‘Hepa’ kits located on each jobsite. Spills beyond the limit of the kit’s absorbent are deemed non-serviceable and thus attempts to clean must be directed to the customer their alternate source(s).

When using the blood borne pathogen kit, employees must wear all protective gear provided (face shield and/or eye protection, garment/gown and gloves) and should follow the instructions in the kit NOT skipping the order of tasks to be performed.

When cleaning a blood borne spill, an employee must notify their supervisor first prior to start of work, proceed with cleanup upon authorization of supervisor, mark the area with wet floor/caution signs and only then proceed.

All employees will receive training and awareness of this process upon hire and annually during the company’s haz com policy review.

* 1. Multi-Employer Worksites – Informing Customer(s)
     1. If GDI exposes any employee, guest, or visitor of another employer/company to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer/customer:
        1. The hazardous chemicals they may encounter
        2. Measures their employees can take to control or eliminate exposure to the hazardous chemicals
        3. The container and pipe labeling system used onsite.
        4. Where applicable SDS can be reviewed or obtained.
     2. In the event that GDI employees may be exposed to potentially hazardous chemicals brought into our facilities or into our customer’s facilities, we will obtain from that source information pertaining to the types of chemicals along with measures that should be taken to control or eliminate exposure.
     3. It is the responsibility of the site coordinator and/or project/operations manager to ensure that such information is provided and/or obtained prior to any services being performed by the offsite party. The information will be obtained through direct interface with our customer(s) and/or facility managers.
  2. Spill containment
     1. Product containment through purchasing – In order to avoid spillage in GDI warehouses or on the jobsite, the purchasing of large containers (over 5 gallons) is general prohibited with exceptions made only when a specific jobsite dictates such a bulk purchase.
     2. Product containment through site prevention – For jobsites that have chemical product in containers exceeding 5 gallon spill guards, containment housings or other OSHA approved devices will be put into play with the storage of these products.
        1. Policies on how to properly use and store chemicals in thes4.12e containment units will be maintained on the jobsite and all employees shall be trained on general awareness of such containment systems.
        2. Spill containment measures shall comply and be rated to handle the amount of chemical a specific container(s) can hold that could be expected in a possible spill scenario.
     3. Prevention: keeping areas clean and orderly is one of the primary steps in spill prevention. Management shall audit these areas as part of their site safety audits to validate housekeeping, storage and use programs are effective and are not lending to potential spills.
     4. In the event of a chemical release/spill the following communication protocols must be followed in the order listed below (first listed – first utilized):
        1. Notify site security of spill

If the spill has potentially hazardous / life threatening conditions local emergency agencies must be notified through site security or directly when there is no site security.

* + - 1. Notify direct site contact of spill
      2. Notify GDI management
      3. Notify GDI Safety
  1. Mixing Chemicals
     1. Employee should never mix two chemicals OR use two chemicals at the same time on the same surfaces (areas of cleaning) either in tandem or together. This could cause a potentially serious chemical reaction that could lead to possibly serious injury.
     2. When using a chemical mixing station OR transferring ANY liquid from one container/vessel to another safety goggles shall be worn until the mixing (of concentrated chemical) / filling task is complete.
     3. Although many chemicals can react badly when mixed the following are of particular concern:

Do not mix bleach and ammonia.

Do not mix bleach and acids.

Do not use two drain cleaners together, or one right after the other.

* 1. Process Safety Management

The primary purpose of the PSM Standard is to prevent or minimize the unwanted release of hazardous chemicals, especially into locations that would expose personnel to serious hazards. This section is an expansion of section 4.10 above.

It is the company's intent to comply with all applicable regulations and to provide a workforce that is trained to safely perform their jobs with a full knowledge of the hazards and safe work practices associated with refining/chemical plant or other PSM regulated industry work job sites. In accordance with the law, employees will receive initial and refresher training in the following:

* An overview of the refinery/chemical plant/facility process and operating procedures for the process that employees will be working with or near, including the hazards of the chemicals used in the process. This will include a complete review of the company HazCom Program and all SDSs that are provided for each unit where the employees will be working per this policy;
* Specific safety and health hazards including SP-07 site hazard assessment;
* Procedures and safe work practices applicable to the employee's job tasks, including personal protective equipment, permits (confined space, hot work and general safe permits, job hazard analysis and auditing;
* Incident investigations are required for all incidents. When an incident occurs, an investigation will be immediately implemented, but not longer than 24 hours after the incident and must be reported immediately – same shift. Causal analysis and corrective actions will be documented and tracked for closure. Those records will be kept for a minimum of 5 years.
* The site-specific Emergency Action Plan.

Employees shall comply with established procedures and safe work practices, be on the alert for changing conditions and quickly report any accidental release or potential release of hazardous chemicals to a supervisor.

The company will promptly investigate every incident that results in, or could have resulted in, a dangerous release of a hazardous chemical.

All employees will attend the customer’s (refinery/chemical plant/facility) process overview and any site-specific training during the refinery/chemical plant/facility orientation, including the process overview and Emergency Action Plan. Attached is a summary of applicable information taken from the PSM standard.

Process Safety Management of Acutely Hazardous Materials

These regulations contain requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals. These regulations are intended to eliminate to a substantial degree, the risks to which employees are exposed in petroleum refineries and chemical plants.

* + 1. The client shall develop and share with GDI steps for each operating phase, operating limits, and safety and health considerations for work that could result, or bring within contact with areas that could, in a release of toxic, reactive, flammable , or explosive chemicals.
    2. GDI will comply with the client to follow all safe work practices to provide for the control of hazards during operations. If there is a conflict between GDI policy and client policy the most stringent policy shall be adopted.
    3. Training – all employees presently involved in operating or maintaining a process, and each employee before working in a newly assigned process, shall be trained in an overview of the process and in the operating procedures. The training shall include emphasis on the specific safety and health hazards, procedures, and safe practices applicable to the employee's job tasks.

Refresher training shall be conducted at a minimum of a 3-year interval and whenever a significant change to the written procedures, process, or environment has been made.

Training shall be documented within GDI’s documentation system and communicated to the client.

GDI contractors are subject to the same policies as GDI employees with not exceptions.

* + 1. Management of Change (MOC)

Our client (refinery/chemical plant/facility) that is covered by the standard will typically handle all MOC situations, but we need to be aware of the program and be mindful that if we get involved with any changes, the necessary steps will need to take place. The company will establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.

Prior to the change, address the following considerations:

• The technical basis for the proposed change;

• Impact of change on safety and health;

• Modifications to operating procedures;

• Necessary time period for the change; and,

• Authorization requirements for the proposed change.

The Company will train affected employees and contract employees in the change prior to start-up of the process or affected part of the process.

1. **Compliance**

**ALL** employees of GDI are required to comply with this and all company and regulatory safety rules, policies, and laws. Failure to do so will result in immediate disciplinary action that can lead up to and include termination. Safety is a priority at GDI and is each employee’s duty and responsibility to do their part to help ensure a safe work environment.

1. **Related Documents**

* SP-02 Safety Policies
* SP-06 Hazardous Material Designation List

~ SDS Audit Log ~

\*\*\*place this page in front of SDS book\*\*\*

Based on compliance with section 4.3.5 of GDI’s Hazard Communication Policy SP-05 this SDS book has been audited and all SDS have been verified to be the most current revisions for the products identified.

So verified by:

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| **DATE (mm/dd/yyyy)** | **VERIFICATION BY** |
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