



EMPLOYEE RIGHT-TO-KNOW ACT HAZARD COMMUNICATION PROGRAM

1. POLICY

The policy of this company is to perform work in the safest, most practical manner. The company will provide the safest possible working conditions for its employees and other individuals who visit company premises and jobsites. It is a condition of employment for employees of this company to acknowledge receipt of this program in writing and to follow all directions, written and verbal, pertaining to this program.

2. PURPOSE

To communicate the Pearson Wall Systems, Inc. Hazard Communication Program to company personnel and others who may be exposed to hazardous materials at our worksites.

3. OBJECTIVES

- A. To safeguard our employees' health by providing a management guide for compliance.
- B. To provide our employees, subcontractors and licensed vendors with necessary information concerning health and physical hazards of the chemical material in use on our worksites.
- C. To comply with Department of Labor and Industry Occupation Safety and Health Rules.

4. SCOPE

This program will provide the means for the transmission of information to employees of the chemical hazards to which they are exposed. It will include, but not be limited to, the following:

- A. Listing of all chemical products used or stored on company property.
- B. Hazard determination for all chemicals in use or stored on company property.
- C. Appropriate labels on containers of all chemicals used.
- D. Material Safety Data Sheets (MSDS) will be available for all chemical products on the property.



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4. SCOPE, CONTINUED

- E. Employees will be trained to recognize and interpret labels, warnings, color-coding and signs affixed to containers in order to avoid and/or lessen potential hazards.
- F. Employees will be trained in the use of MSDS's, their location and availability, in order to avoid and/or lessen potential hazards.
- G. This written "Hazard Communication Program" will be available upon request to employees, their designated representatives, and emergency personnel, etc.
- H. Administrative responsibilities for this program are hereby delegated to the Safety Director, Jobsite Superintendent, and Project Manager.

5. CHEMICAL LISTS

- A. A list of all chemicals used or stored on company property will be assembled, maintained and updated in a timely fashion to reflect the chemicals actually in use or stored on company property. These will be maintained in a central file at the jobsite job box.
- B. Provide procedures and policies to personnel purchasing materials to ensure compliance with current regulations. These shall include:
 - 1. A notice that purchases of a potentially hazardous material is conditional upon a receipt of the current MSDS.
 - 2. A notice that all chemicals must be properly labeled.
 - 3. A system to verify those Items 1 and 2 above has been met by Suppliers.

6. LABELING/PLACARDING

A. Labeling

All containers of hazardous materials, regardless of size, must be labeled.

- 1. Original labels on containers are not to be removed.
- 2. If a different material is placed in the container, the label must be changed to reflect its true contents.
- 3. All labels should include the following:
 - A. Name of substance in container
 - B. Appropriate hazard warnings
 - C. Name and address of manufacturer or distributor
- 4. All pipes and process lines whose contents and direction of flow are not obvious from the equipment served shall be appropriately labeled, such that the labels are visible at access points.

B. Placarding



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6. LABELING/PLACARDING, CONTINUED

All storage areas, storage tanks of 1,000 gallons or greater, process vessels, and reactors will be appropriately placarded. The appropriate placard to be determined in cooperation with the local Fire Marshall---on buildings smaller than 5,000 square feet, the placard shall be placed the outside of the building. On buildings larger than 5,000 square feet the placard shall be within the building at appropriate areas inside.

7. TRAINING

A. General Contractors will:

1. Obtain all Data Sheets of products on hand; have a copy of appropriate ones on the jobsite.
2. Train all employees who routinely use said products.
3. Have employees sign prepared statements that they were informed of the potential health hazards.
4. **READ AND EXPLAIN** the Data Sheet information to affected personnel.

B. Subcontractors will:

1. Provide training for their employees and others affected.
2. Submit current Material Safety Data Sheets and a list of individuals trained.

C. All Jobsite contractors will:

Train persons, employees, or employees of other contractors who will routinely be exposed because of their use of hazardous material. For example, if Subcontractor #1 is using a hazardous material which affects the employees of Subcontractor #2, then Subcontractor #1 shall be responsible for related training of their own employees and the employees of Subcontractor #2.

1. Train employees routinely exposed to hazardous material through use, handling, or transportation.
2. Provide orientation training for all employees who are newly hired, assigned, or transferred where they will be routinely exposed to hazardous materials.

D. Training Components

1. Explanation of Right-To-Know Law
 - A. Employee rights and responsibilities
2. Introduction to the written Hazard Communication Program
3. Hazard Determination
4. Availability and interpretation of MSDS's.



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7. TRAINING, CONTINUED

5. Labeling and Placarding
 6. Physical and health hazards of chemicals in work place
 - A. Flammable Materials
 - B. Corrosive Materials
 - C. Toxic Materials
 - D. Explosives
 - E. Oxidizers
 - F. Cryogenics
 - G. Adhesives
 - H. Lubricants
 - I. Irritants
 - J. Sensitizers
 7. Harmful Physical Agents
 - A. Noise
 - B. Heat Stress
 - C. Radiation
 8. Protective Procedures
 9. Protective Equipment
 10. Procedures for Non-routine tasks
- E. Employees shall be retrained annually and/or when a non-routine task begins.