

WRITTEN HAZARD COMMUNICATIONS PROGRAM

FOR

CIRCUIT CONTROLS CORPORATION



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1 - PURPOSE

Circuit Controls Corporation has implemented this Written Hazard Communication Program to meet the letter and intent of the MIOSHA Hazard Communication Standard. The objective of this written program is to effectively disseminate pertinent data on the safe handling of hazardous chemicals in the workplace to all appropriate personnel and to outline their rights and responsibilities under the MIOSHA Hazard Communication Standard. This program will be available upon request to all employees and their designated representatives.

2. GENERAL PROGRAM MANAGEMENT

The following steps have been taken by Circuit Controls Corporation to implement and effectively manage this Hazard Communication Program.

A. RESPONSIBILITY PROFILES

There are four major “categories of responsibility” that are essential to the effective implementation of the Hazard Communication Program. The following sections define the roles played by each of these groups in carrying out the program.

1. ENVIRONMENTAL, HEALTH SAFETY DEPARTMENT (EHS)

The EHS department is responsible for overall management and support of the operation’s Hazard Communication Program. Activities included, but not limited to:

- a. Revise and update this program when necessary.
- b. Collect and distribute MSDS sheets to all appropriate work areas.
- c. Post the receipt of newly received or revised MSDS no later five (5) working days after its receipt.
- d. Maintain the master inventory list of hazardous chemicals and the MSDS file.
- e. Conduct periodic audits to maintain an up-to-date hazardous chemical inventory and to assure general compliance with the program.
- f. Institute a labeling system for containers .

- g. Develop and implement an employee training program to include classroom instruction with appropriate training materials and documentation.

2. MANAGEMENT

Management is responsible for the on site management of the Hazard Communication Program. Responsibilities include:

- a. Training employees on the proper handling of hazardous substances in their work area and use of necessary personal protective equipment.
- b. Maintaining a supply of personal protective equipment (i.e. gloves, face shields, respirators) as needed.
- c. Informing the EHS department of any and all new hazardous chemicals in the work area.
- d. Insuring that all containers, including transfer containers, are appropriately labeled.

3. DESIGNATED TRAINERS

Training personnel are responsible for the education and training of all personnel.

- a. Developing suitable training programs utilizing the methods identified in Section 4.0 Education and Training.
- b. Maintaining appropriate training documentation such as sign-in sheets, quizzes, manuals, etc.

4. EMPLOYEES

Employees have an important role in the Hazard Communication Program. Responsibilities include:

- 1. Know which chemicals in their work area are hazardous.
- 2. Become familiar with the information on the MSDS for the hazardous chemicals in their work area.
- 3. Observe all the handling precautions noted on the MSDS and as discussed in the training sessions.
- 4. Attend the Hazard Communication Training Session conducted by the Hazard Communication Trainer.

5. Inform Department Management:
 - Before performing a non-routine task in which hazardous chemicals are involved.
 - When encountering hazardous chemicals in the work area which are either not labeled properly, not identified in the inventory listing, or do not have an MSDS in the “Right-to-Know” Compliance Manual.

B. HAZARD DETERMINATION

In general, we have elected to rely on the data contained in the manufacturer’s **Material Safety Data Sheet** for evaluating the hazards associated with any chemical processed, used or stored on-site. An MSDS sheet must be acquired at the time of purchase for all new chemicals.

C. MATERIAL SAFETY DATA SHEET ACQUISITION

We recognize that it is very important that we have a Material Safety Data Sheet for each potentially hazardous substance we use.

The procedure below is followed as part of our normal operations in order to make sure that we have Material Safety Data Sheets for all materials that we use in our operations:

- The Purchasing Department requests MSDS for all new chemical products purchased for our facility.
- For any shipment of a potentially hazardous substance that is received at our location, the Receiving Department will verify that a Material Safety Data Sheet was received with the shipment.
- If an existing MSDS for the substance exists, no further action is required.
- If an MSDS for that substance does not exist, the Purchasing Department will request an MSDS from the supplier before the chemical can leave the receiving area.

All of the MSDS are kept on file in the “Right-to-Know” Compliance Manual. Review of the MSDS records will be conducted periodically.

D. CONTAINER LABELING

1. In general, we rely on manufacturers and suppliers to appropriately label all incoming containers they deliver in accordance with the standard. However, we recognize that the following materials are exempt from the Hazard

Communication Labeling requirement, and will therefore accept these materials for delivery without the labeling required by the Standard.

- Any pesticide as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), when subject to the labeling requirements of the Act and labeling regulations issued under that Act by the Environmental Protection Agency.
- Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 1251 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively when subject to a consumer product safety standard or labeling requirement of those acts.

2. LABELING REQUIREMENTS- PRODUCTS FROM MANUFACTURER

We recognize that the minimum amount of information required by the Hazard Communication Standard for container labels are:

- Identity of the hazardous chemical(s) contained therein.
- Name and address of the chemical manufacturer, importer, distributor or other responsible party.
- Appropriate hazard warnings.

The Receiving Department is responsible for seeing that incoming containers of potentially hazardous chemicals are checked to ensure that labeling covering these requirements is affixed.

- No label is to be defaced or removed when material is received or in use. Any containers with missing labels will be removed from service until proper labels are installed.

3. IN-HOUSE LABELING GUIDELINES

We also recognize that we are responsible for labeling “in-house” secondary containers. Each department is responsible for seeing that these containers of materials, which are used or produced exclusively by our operation, are labeled using the following guideline:

- When materials are transferred from original to secondary containers, each secondary container is labeled, tagged or clearly marked to identify the contents, appropriate hazard warnings and recommended personal protective equipment.

- Stationary vessels, tanks or pipes which contain hazardous materials have clearly affixed labels, signs, or placards which identify the container contents and have the appropriate hazard warnings.
- “Empty” containers are not reused for other than the original containers substances unless the original labels are removed or defaced and a new label is attached to identify the new contents and associated hazard warnings.

4. LABELING SYSTEM

We have chosen to use the self Stick Labels and / or Permanent Markers or Tags / Tape labeling system for our operations.

E. NOTIFICATION OF ON-SITE CONTRACTORS

Contractors working on-site will be informed of the potential hazards present in our work areas through our Contractors Orientation Program and our Outside Contractors Regulations found in Appendix A of that program. A copy of their acceptance of our regulations will be kept on file.

Prior to conducting any on-site work, contractors will be given access to our Contractors Orientation Program along with a copy of our Written Hazard Communication Program so that they may review it. They will also be given access to the Hazardous Substance List(s) and MSDS’s for the areas in which they will be working.

We will require that all contractors disclose all hazardous substances they intend to bring onto our property and provide Material Safety Data Sheets on those substances.

F. PIPES AND PIPING SYSTEMS

The piping systems in our work areas have been identified and this information has been provided to all employees during their education sessions. Any pipelines in this area, which contain hazardous chemicals, are identified below. With the work practices performed in this area, these pipelines should not cause a hazard to our employees.

<u>PIPING SYSTEM</u>	<u>CHEMICAL</u>
PVC & Copper	Water
Steel Piping	Gas

PVC (Double Walled outside of Chemicals containment areas/single wall inside)

Steel Piping Air

Steel Steam

Non-routine tasks performed in connection with our operation have also been identified:
TASKS CHEMICAL HAZARD

None See MSDS Sheets

Employees in the area have been informed of these tasks and their associate hazards during the education sessions they attended. They have also been informed regarding the required proper personal protective equipment that must be worn when performing these tasks. “Reminders” will also be provided to employees engaged in these non-routine tasks prior to the actual performance of the tasks.

3. CHEMICAL INVENTORIES

A. HAZARDOUS CHEMICAL LISTS(S)

A Hazardous Chemical List has been compiled for our operations from inspection / inventories conducted. Additional inspections / inventories will be conducted periodically to assure the accuracy of this list. In general, we will rely on the Material Safety Data Sheets (MSDS) information provided by the manufacturer or supplier to determine if a specific chemical or product is to be included in the “Hazardous Chemical List”.

The following classes of materials are, however, excluded from the hazard determination requirements contained with this program, as provided by MIOSHA (Ref. 29 CFR 1910.1200 (b) (6)) and, therefore, have not been included on the Hazardous Chemical Lists:

- Any Federally regulated hazardous waste
- Tobacco or Tobacco Products
- Wood and Wood Products
- Food, Drugs or cosmetics intended for personal use by employees while in the workplace.

The Hazardous Chemical List for our operations can be found in the “Right-to-Know” Compliance Manual. A significant “employee right” under the standard is to receive a copy of this list. The EHS department has the responsibility of making sure that all employees requesting copies of the list receive them within five (5) working days of the date the list is requested. To make sure that employees have “workplace access” to this list, copies of the

Hazardous Chemical List are also kept at appropriate locations throughout our work areas, along with copies of the MSDS's for chemicals used in the surrounding work areas.

The chemicals for this facility are included in a master MSDS Index Log that accompanies each MSDS Master Copy.

4.0 EDUCATION AND TRAINING

- A. All employees, including temporary employees, working with potentially hazardous chemicals, will be appropriately informed and trained.
- B. All employees will be informed of the details of the Hazard Communications Program including an explanation of the labeling system and the Material Safety Data Sheets, and how employees can use the appropriate hazard information.
- C. The Department Manager will provide employees with additional training when new hazardous chemicals are introduced and added to the Material Safety Data Sheet Index Log, or before non-routine tasks are to be performed that could involve exposure to hazardous chemicals.
- D. Reinforcement of training will be conducted through topics at safety meetings, as appropriate.
- E. The extent of information transmitted to employees during the training sessions will be dictated by the degree of hazard presented by the chemicals. The applicable MSDS's the text of the Hazard Communication Standard, the inventory list of hazardous chemicals, and the written programs will be used as sources of information during the training sessions.