HAZARD COMMUNICATION PROGRAM
For
Ragle, Inc.

INTRODUCTION

A. Statement of Need

There are two primary reasons why Ragle, Inc. will implement a Hazard Communication Program (HCP). One, the employer must comply with the Federal OSHA standard 29 CFR 1910.1200 (general industry) or 29 CFR 1926.59 (construction). Additionally, a HCP will assist the company in achieving our overall goal of a safer work place.

B. Anticipated Benefits

Several benefits are anticipated with the implementation of the Hazard Communication Program.

1. Prevention of chemical related illnesses and injuries.
2. Overall improvement of the company safety program.
3. Improvement of employer-employee relations by establishing regular lines of communications.
4. Avoidance of OSHA citations, violations, and related problems.

C. Program Administrator

SAFETY MANAGER
JASON C. RAGLE
C: 812-305-5580

D. Locations and Contact Persons for the Written Program

1. Locations: Ragle, Inc. Office, each Ragle, Inc. Jobsite
2. Contact Person: Jason C. Ragle, Safety Manager
3. Telephone Number: 812-305-5580

E. Compliance Checklist

A checklist for ensuring compliance with OSHA standards can be found in Appendix D

F. Warning

Chemicals will not be used until the following requirements are met:

1. All affected employees are properly trained to use the chemicals;
2. A material safety data sheet (MSDS) is obtained for each chemical;

3. Each chemical is added to inventory list (Appendix A);
4. Proper personal protective equipment has been selected and issued to affected employees.

Chemicals, which do not meet the four requirements, will be stored in Ragle, Inc.'s Jobsite Yards and marked "Do Not Use." Until Hazard Communication and Personal Protective Equipment Requirements are met by Hazard Communication Program Administrator: SAFETY MANAGER

I. Purpose

The purpose of the Hazard Communication Program is to ensure that the hazards of chemicals located on the jobsite are evaluated and that information concerning physical and health hazards is transmitted to potentially exposed employees. It is not only the intent of the employer to fully comply with the OSHA Standard 1910.1200 and 1926.59, but also to improve the overall safety of our company. A successful Hazard Communication Program will reduce potential incidents of chemical source illnesses and injuries.

II. Authority

The Hazard Communication Program is required by the Indiana Occupational Safety and Health Administration, pursuant to Title 29 CFR Subpart Z part 1910.1200 and/or 29 CFR 1926.59.

III. Summary

The passage of OSHA's HCP Standard gives the employer the responsibility to establish a written, comprehensive program which includes provisions for container labeling, material safety data sheets, and employee information and training. The written program must contain a list of the hazardous chemical(s) in each work area, the means used to inform employees of hazards of non-routine tasks, the hazards associated with chemicals contained in unlabeled pipes in the work area, and methods used to inform contractors in the facilities of chemical hazards to which they may be exposed.

The written Hazard Communication Program outlines the plan to establish the objectives of the standard. Each objective will be defined and discussed in this document. Additionally, this written program shall be reviewed during employee training.

The written plan will be reviewed every (1 YEAR by January 31) for accuracy and completeness.

The written plan and its elements will be updated in the following situations:

1. New chemicals are introduced into the workplace.
2. When new processes involving chemicals are introduced.
3. When program job duties are changed.
4. When locations mentioned in the program are changed.
5. When any other elements are changed.

A record of the last change which includes the date and change will be recorded, and kept with this program by the hazard communication program administrator.

A. Objective 1 – List of Chemicals

The SAFETY MANAGER is required to maintain and update the list of chemicals purchased or used by this facility. The SAFETY MANAGER is required to maintain and update the hazard communication program list of chemicals. The list can be found in Appendix A of this program. Other locations of the list are: RAGLE, INC. OFFICE, SAFETY MANAGER'S VEHICLE, UPPER MANAGEMENT VEHICLES.

1. The SAFETY MANAGER will have a chemical list on file. New chemical products will be immediately reported to the SAFETY MANAGER by the purchase or use list employee.
2. As new chemicals are purchased, the SAFETY MANAGER will record chemical(s) on the list. Changes in the list will be noted on the hazard communication program list for (Appendix A).

B. Objective 2 – Material Safety Data Sheets (MSDS)

Employee in charge of MSDS acquisition: SAFETY MANAGER

Material Safety Data Sheets are the keystone to a successful hazard communication program. MSDS are designed to provide the information needed to handle chemicals safely. They provide the necessary information for training, hazard evaluation, proper handling, emergency procedures, and employee personal protective equipment.

The following procedures will be implemented to ensure that the employer maintains a MSDS for all chemicals identified on the hazard communication chemical list and the chemical purchase list.

1. Chemical manufacturers, importers, or distributors supplying the employer with products are required by law to send MSDS with the first shipment. As MSDSs are checked off against the chemical inventory, missing MSDSs should be requested first by telephone from the manufacturer, importer or distributor of the chemical. A written record of the phone call, including the name of the contact person should be placed in a special file. IF the telephone request is not successful, a formal letter should be written to request the MSDS. A copy should be placed in the special file. A sample form letter can be found in Appendix E.
2. The SAFETY MANAGER will document all attempts to obtain all MSDSs.
3. This will require the SAFETY MANAGER to attain a MSDS for each new chemical purchased, as well as updated MSDSs for existing chemicals. This requirement will be indicated on all purchase orders.
4. If it is not possible to obtain a MSDS for a chemical, the following action will need to be taken by the SAFETY MANAGER: contact SAFETY MANAGER about using a new or alternate chemical which has an available MSDS.
5. MSDSs for chemicals which are part of an employee exposure record, but no longer used shall be filed by the SAFETY MANAGER. An exposure record concerns information when an employee is exposed to a chemical. A more complete definition can be found in 29 CFR 1910.20 (c)(8) and (10).

   If the MSDS was involved with an employee exposure record, the MSDS must be handled in one of the following methods:
   1. Kept in an "old MSDS" file with a reference to the exposure record; or
   2. Kept with the exposure record with a reference, or copy in the "old MSDS" file.

   Old MSDSs linked to an exposure record must be maintained for at least 30 years.

MSDSs for chemicals no longer used, and not linked to an employee exposure record will be maintained in one of two ways:

1. Place the old MSDS in a special "old MSDS" file; or
2. Make a record of the MSDS and maintain it for 30 years (as per 1910.20 (d)(1)(ii)(B) and referenced by 1926.33) with the following information:
    a. Identity (chemical name if known)
    b. Where used (site and building)
    c. When used
    d. A glossary of MSDS terms will be available with all copies of the MSDS and part of the HCP, and will be a training discussion item.
    e. Updated MSDSs and new MSDSs will be immediately placed in binders.

6. The employer will rely on each chemical manufacturer's testing and hazard evaluation of chemical products used throughout the facility. The MSDS acquisition and MSDS purchase request employees will ensure that MSDSs are supplied, and that information contained on all MSDSs is complete.

C. Objective 3 – Labeling

Hazard Labeling Administrator: SAFETY MANAGER

The SAFETY MANAGER will ensure proper labeling of primary and secondary containers.

1. Labeling

   The employer will rely heavily on chemical suppliers to provide labeling on the products used in the facilities that meets the requirements of 29 CFR 1910.1200 (f), or 1926.59(f). There are three basic requirements of this section:
   A. Identity of the chemical
   B. Appropriate hazard warning – including target organs
   C. Name and address of the chemical manufacturer

2. Shipped and purchased containers

   With the arrival of each chemical the SAFETY MANAGER will check all container to ensure that all labels meet the requirements outlined in this program. The employer will not accept improperly labeled containers. If there is a problem with a container, the MSDS acquisition and MSDS purchase employees should be immediately notified. They will check the program chemical list and the chemical purchase list to ensure that the proper MSDSs and labels have been received and updated for the product.

3. Secondary container labeling

   Secondary containers of chemicals should be marked in the following situations:
   A. More than one employee uses the container; or
   B. The container is used longer than one shift, or left in a work area. If one employee uses the chemical without exposing others, and either returns the

contents to the original container, or disposes of the rest of it, labeling of the secondary container is not necessary.

The secondary label should contain the following information, which can be obtained from the original container, or the MSDS:

A. Identity of the chemical as specified on the MSDS
B. Hazard warning – physical hazard or illness
C. Target organ of the body

The SAFETY MANAGER will provide secondary container labels, and make sure that they are properly marked. The SAFETY MANAGER will also develop special methods of identification where needed.

D. **Objective 4 – Employee Training**

Employee hazard communication training administrator: SAFETY MANAGER

The Hazard Communication Standard requires the employer to provide exposed employees with information and training on the following subjects:

1. Information:
    a. Requirements of the standard; and
    b. Operations in the work area where hazardous chemicals are present; and
    c. 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 standard.
2. Training:
    a. 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.); and
    b. The physical and health hazards of the chemicals in the work area; and
    c. The measure employees can take to protect themselves from these hazards, including specific hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and
    d. The details of the hazard communication program developed by the employer, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

The SAFETY MANAGER will provide training to employees in the following situations:

a. Prior to working with a chemical
b. When job duties change with exposure to new chemicals.
c. When new chemicals are introduced into the workplace.
d. When job duties change which require special training for a special process with a chemical.

The methods of training are specified in Appendix B of the program. The training records will contain the following information:

a. Date of training
b. Name and job title of trainer

c. Names of the trainees
d. Training topics
e. Any other information to document the validity of the training. Example: credentials of an outside trainer.

The training records form can be found in Appendix C of the written program. The training records can be found at RAGLE, INC.'S OFFICE or by contacting SAFETY MANAGER.

A special publication, "Hazard Communication: A Key to Compliance" can be found in Appendix D of this program. This program explains in detail the intent of the Hazard Communication Standard.

E. **Objective 5 – Hazard Assessment for Non-Routine Tasks**

Hazard Communication non-routine task administrator: SAFETY MANAGER

Non-routine tasks are those tasks, which do not occur on a frequent basis, or those tasks, which are not identified as a normal production task. However, many of the tasks required of the maintenance employees will be evaluated on a case-by-case basis to determine if they are to be considered a non-routine task.

The SAFETY MANAGER should be consulted about non-routine tasks.

The hazard communication trainer will train employees about the chemical hazards on non-routine tasks.

F. **Objective 6 – Work performed by outside contractors**

1. The SAFETY MANAGER will provide contractors with a list of chemicals used in the work area(s). The contractors will also be provided with copies, or the location of the facility MSDSs.
2. The SAFETY MANAGER will find out what chemicals are being brought into the facility by outside contractors. Copies of the MSDSs, or location of the contractors' MSDSs will be obtained.

G. **Objective 7 – Non-labeled pipes**

The SAFETY MANAGER will provide special employee education and training for employees who may be involved with work on pipes and piping systems, which carry chemicals.

H. **Multi-employer Worksites (construction)**

1. At multi-employer worksites the SAFETY MANAGER will offer to the site general contractor or site safety director at >PHYSICAL SITE OR ADDRESS< the copies of the following elements of the RAGLE, INC. hazard communication program:
    a. The list of chemicals at the site.
    b. All MSDS sheets used at the site.
    c. The physical location of the employer's HCP at the worksite: PHYSICAL LOCATION
    d. The name of the employer's Hazard Communication Program Administrator at the worksite: <JASON RAGLE, SAFETY MANAGER>

e. The site phone number of the employer's Hazard Communication Program Administrator: (812)305-5580

2. Exposure to chemicals from other employers at the multi-employer worksite:

The Ragle, Inc. SAFETY MANAGER will contact the following personnel to obtain information about chemicals other employers are using which affect employees at the site:

a. Site general contractor Hazard Communication Program Administrator; or
b. Site Safety Director; or
c. Hazard Communication Program Administrator(s) of the other employers.

The SAFETY MANAGER will obtain the following information from the site general contractor, site safety director or other hazard communication program administrator(s);

a. A list of site chemicals for each employer to which the employees are exposed; and
b. Copies of MSD sheets for chemicals to which the employer source.

The MSD Sheets and lists should be marked to indicate the employer source

The SAFETY MANAGER will use the information obtained from the other employers to provide additional training, update the site written hazard program for employees, and ensure that other elements of the program are update for the exposed employees.

Hazard Communication Training Program

Hazard Communication Training Administrator: Jason Ragle, SAFETY MANAGER

1. Ragle, Inc. falls into a construction category where OSHA regulations require four basic needs for hazard communication:
   a. A written hazard communication program.
   b. Material safety data sheets (MSDS) on each chemical.
   c. Label all chemical containers.
   d. Train employees about hazards of the chemicals they use.

2. Some employees work with or near hazardous chemicals, and the company wants those employees to be aware of this and the protective equipment use which may include face shields, glasses, splash goggles, respirators, gloves, rubber boots, full-body suits, aprons, or maybe only one or two of the above. Then in case of accident, the company wants the employees to know what to do to protect themselves from these hazardous chemicals. Special training and hazard assessment for the use of personal protective equipment will be conducted as specified in 29 CFR 1910.231 through .138.

3. Many of you do not work with hazardous chemicals. Nevertheless, Ragle, Inc. wants to advise you about chemicals used by the company. Also, this information may be helpful in the use of chemicals in your homes, and in your yards and gardens. There are many hazardous chemicals used in the home.
4. Part of our program relates to what we call MSD sheets. MSDS stands for Material Safety Data Sheets. If you aren't a chemist, there will be much on this data sheet that you won't understand, and those parts deal with how we use the chemicals and the personal protective equipment in case of an accident. Therefore, discussing how to read an MSDS is vital part of this program.

5. You may breath chemicals into your lungs. Chemicals can also enter through the skin, nose, mouth, eyes, and elsewhere.
6. Chemicals may affect you lungs, heart, skin, kidneys, brain, nervous system, liver, eyes, and other parts of your body.
7. If you work with chemicals, learn or post emergency procedures, emergency telephone numbers, and how to read labels. If you transfer to another work location with new chemicals, learn how to safely use those chemicals.

   If new chemicals are brought into your work place, learn the hazards of these and how to safely handle them, what protective equipment to use and what to do in case of an emergency. If you encounter a new chemical that you are not familiar with, contact your supervisor about proper training before using the chemical.

8. Each of you have been presented with a MSD Sheet. We will discuss the information on this sheet. (Complete discussion on all data on the MSDS)
9. Safety Manager will discuss the location on the jobsite where hazardous chemicals are used and the proper and safe work procedures for these chemicals. The proper use of personal protection equipment will be discussed. Also, in case of an accident, you will be advised about safety precautions to be taken to protect yourself from serious injury.
10. Safety Manager will also advise you on the job site location where the MSD Sheets are kept, along with Ragle, Inc.'s written program for hazardous chemicals. You are entitled to look at this data at any time should you wish to know about the chemicals in your work place. Let me suggest that you contact your supervisor in these cases to see these records.
11. Safety Manager will also advise you about how the SAFETY MANAGER for Ragle, Inc. is labeling these materials, and how to detect hazards by visibility and odors.
12. Generally speaking:
    a. Know if you are working with hazardous materials.
    b. Know how to recognize them by sight, by labels, by odors, etc.
    c. Know how to use the chemicals safely.
    d. Know what to do in case of a chemically related accident.

Appendix A: List of Chemicals (or Chemical Inventory)

RAGLE, INC. LIST OF CHEMICALS								
#	CHEMICAL	DATE	#	CHEMICAL	DATE	#	CHEMICAL	DATE
1			46			91		
2			47			92		
3			48			93		
4			49			94		
5			50			95		
6			51			96		
7			52			97		
8			53			98		
9			54			99		
10			55			100		
11			56			101		
12			57			102		
13			58			103		
14			59			104		
15			60			105		
16			61			106		
17			62			107		
18			63			108		
19			64			109		
20			65			110		
21			66			111		
22			67			112		
23			68			113		
24			69			114		
25			70			115		
26			71			116		
27			72			117		
28			73			118		
29			74			119		
30			75			120		
31			76			121		
32			77			122		
33			78			123		
34			79			124		
35			80			125		
36			81			126		
37			82			127		
38			83			128		
39			84			129		
40			85			130		
41			86			131		
42			87			132		
43			88			133		
44			89			134		
45			90			135		

Note: Date is the Date that Chemical was entered on Chemical Inventory List

Appendix B: Specific Methods of Training

RAGLE, INC. HAZCOM TRAINING						
Date of Training	**Name and Job Title of Trainer**	**Names of Trainees**	**Training Topics**	**Training Method**	**Other Information**	**Material Handed Out**
		*PER ATTACHED SHEET				

Appendix C: Training Record

RAGLE, INC. HAZCOM TRAINING				
Employee Name	**Employee Title**	**Training Attended (Topic)**	**Trainer Name**	**Date of Training**

Appendix D: Guidelines for Employer Compliance

The Hazard Communication Standard (HCS) is based on a simple concept—that employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. The HCS is designed to provide employees with the information they need.

Knowledge acquired under the HCS will help employers provide safer workplaces for their employees. When employers have information about the chemicals being used, they can take steps to reduce exposures, substitute less hazardous materials, and establish proper work practices. These efforts will help prevent the occurrence of work-related illnesses and injuries caused by chemicals.

The HCS addresses the issues of evaluating and communicating hazards to workers. Evaluation of chemical hazards involves a number of technical concepts, and is a process that requires the professional judgment of experienced experts. That's why the HCS is designed so that employers who simply use chemicals, rather than produce or import them, are not required to evaluate the importers of the materials. Producers and importers of chemicals are then required to provide the hazard information to employers that purchase their products.

Employers that don't produce or import chemicals need only focus on those parts of the rule that deal with establishing a workplace program and communicating information to their workers. This appendix is a general guide for such employers to help them determine what's required under the rule. It does not supplant or substitute for the regulatory provisions, but rather provides a simplified outline of the steps an average employer would follow to meet those requirements.

Appendix E: Material Data Safety Sheets (MSDS)

Appendix E: Form Letter for Obtaining a MSD Sheet(Copy and paste to new sheet, Delete this line)

<DATE>

<MANUFACTURER NAME>
<ADDRESS>

RE: <REASON FOR LETTER>

Dear Mr. or Ms. <CONTACT>:

Ragle, Inc. recently purchased your product(s):

1. <LIST PRODUCTS>
2.

The listed products arrived without a Material Safety Data Sheet (MSDS) upon their first delivery.

Please send me the appropriate MSD Sheet which will meet the requirements set forth in the OSHA standards 29 CFR 1910.1200 and 29 CFR 1926.59.

Thank you for your time and energy in dealing with this matter.

Cordially,

Jason C. Ragle
Safety Manager
Ragle, Inc.