

Sun Steel Treating Inc.

Written Hazard Communication Program

General

The following hazard communication program has been established for Sun Steel Treating Inc. This program will be available for review by all employees.

Hazard Classification

Chemical manufacturers or importers shall evaluate chemicals they produced or import to classify the chemicals in accordance with the revised Hazard Communication Standard.

Effective June 1, 2015 – For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and, where appropriate, the category of each class that apply to the chemical being classified. This information will be placed in the Material Safety Data Sheet/Safety Data Sheet (MSDS/SDS) and on the product label.

Sun Steel Treating Inc. will rely on MSDS/SDSs obtained from product suppliers to determine which chemicals are classified as hazardous for employees.

Labeling

A. The Customer Service Department will be responsible for seeing that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled.

B. All labels shall be checked for:

(Current requirements)

1. Identity of the material.
2. Appropriate hazard warning for the material.
3. Name and address of the responsible party. (Only if the container is received from the manufacturer, distributor, or importer.)

(Requirements effective June 1, 2015)

1. Product identifier;
2. Signal word;
3. Hazard statement(s);
4. Pictogram(s);
5. Precautionary statement(s); and,
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

C. Each Department Manager shall be responsible for ensuring that all secondary containers used in their work area are labeled with the appropriate product identifier and provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

The new workplace labeling rules require Sun Steel Treating Inc. ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with **either**:

The information specified for labels on shipped containers; **OR**, product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Safety Data Sheets (SDSs)

Changes to MSDS/SDS format effective June 1, 2015 – Chemical manufacturers or importers shall ensure that MSDS/SDS for their products includes the following Sections in order:

- Section 1, Identification;
- Section 2, Hazard(s) identification;
- Section 3, Composition/information on ingredients;
- Section 4, First-aid measures;
- Section 5, Fire-fighting measures;
- Section 6, Accidental release measures;
- Section 7, Handling and storage;
- Section 8, Exposure controls/personal protection;
- Section 9, Physical and chemical properties;
- Section 10, Stability and reactivity;
- Section 11, Toxicological information;
- Section 12, Ecological information;
- Section 13, Disposal considerations;
- Section 14, Transport information;
- Section 15, Regulatory information; and
- Section 16, Other information, including date of preparation or last revision.

- A. The Environmental and Safety Manager, or his designate, will be responsible for compiling and maintaining the master MSDS/SDS file. The file will be kept in the Environmental and Safety Manager's office.
- B. Additional copies of MSDS/SDSs for employee use are in the lunchroom.
- C. MSDS/SDSs will be available for review to all employees during each work shift. Copies will be available upon request to the Environmental and Safety Manager.
- D. Posters identifying the person responsible for maintaining MSDS/SDSs and where the MSDS/SDSs are located are posted at the stairway by the coffee pot. Posters notifying employees when new or revised MSDS/SDSs are received will be located in the same location.
- E. If a required MSDS/SDS is not received, the Environmental and Safety Manager shall contact the supplier, in writing, to request the MSDS/SDS. If an MSDS/SDS is

not received after two such requests, the Environmental and Safety Manager shall contact the MIOSHA's Construction Safety and Health Division at (517) 322-1856 or General Industry Safety and Health Division (GISHD) at (517) 322-1831, for assistance in obtaining the MSDS/SDS.

The MIOSHA program does not maintain a library of MSDS/SDSs. However, either of the above divisions will assist an employee in obtaining a copy of an MSDS/SDS by contacting the employer or supplier.

Employee Information and Training

- A. The Environmental and Safety Manager shall coordinate and maintain records of employee hazard communication training, including attendance rosters.
- B. Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:

Information:

- The requirements of the MIOSHA Hazard Communication Standard
- All operations in the workplace where hazardous chemicals are present
- Location and availability of the written hazard communication program, the list of hazardous chemicals, and the MSDS/SDS.

Training:

- Methods and observations that can be used to detect the presence or release of hazardous chemicals in the workplace;
- The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the workplace;
- Measures the employees should take to protect themselves from these hazards;
- Details of the hazard communication program – including an explanation of the new label elements [product identifier; signal word; hazard statement(s); pictogram(s); and, precautionary statement(s)] on shipped containers and the workplace labeling system used by their employer; the new SDS format/sections; and,
- How employees can obtain and use hazard information.

- C. The employee shall be informed that:

1. The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
2. As an alternative to requesting an MSDS/SDS from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 322-1856, or the MIOSHA General Industry Safety and Health Division at (517) 322-1831, to obtain the desired MSDS/SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.

- D. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training class.

Hazardous Non-routine Tasks

- A. Occasionally, employees are required to perform non-routine tasks (i.e., clean equipment, enter confined spaces, etc.). Prior to starting work in such areas, each employee will be given information about the hazards of the area or procedure. This information will include:
1. Specific chemical hazards.
 2. Protection/safety measures the employee can take to lessen risks of performing the task.
- Measures the company has taken to eliminate or control the hazard, including:
- a. air monitoring,
 - b. ventilation requirements,
 - c. use of respirators,
 - d. use of attendants to observe procedures, and
 - e. emergency procedures.
- B. It is the policy of Sun Steel Treating Inc. that no employee will begin performance of a non-routine task without first receiving appropriate safety and health training.
- C. Hazardous non-routine tasks we have at our facility include:
1. Dust collector – west wall and east wall,
 2. Pouring salt bath furnaces.
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Multi-Employer Worksites – Informing Contractors

- A. If our company exposes any employee of another employer to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer:
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 on-site.
 4. Where applicable MSDS/SDSs can be reviewed or obtained.
- B. Periodically, our employees may potentially be exposed to hazardous chemicals brought on our site by another employer. When this occurs we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.
- C. It is the responsibility of the Environmental and Safety Manager to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. To ensure that this is done in a timely manner, the Environmental and Safety Manager must be informed and involved as soon as possible.
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Pipes and Piping Systems

Information on the hazardous contents of pipes and piping systems will be identified by the use of labels. Natural gas, process gasses, steam and compressed air lines are identified in our facility.

List of Hazardous Chemicals

A list of all hazardous chemicals use by Sun Steel Treating Inc. is attached to this document. Further information regarding any of these chemicals can be obtained by reviewing its respective MSDS/SDS. Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list.

Hazardous Chemical List

Hazardous Chemicals

1. Bottled gases – nitrogen, hydrogen, oxygen, argon, ammonia, acetylene, propane, methyl chloride, methane
2. Heat Treat Salts – molten, solid and dust
3. Quench oil
4. Machine oils
5. Mineral spirits
6. Blasting grit and dust
7. Battery acid
8. Grinding wheels and resultant dust
9. Welding rods and resultant fumes

EMPLOYEE EDUCATION
HAZARD COMMUNICATION PROGRAM

Name _____ Department/Shift _____

Date: _____

_____ Location and purpose of MSDS for hazardous chemicals, location of Corporate Written Hazard Communication Program, and use and purpose of container labels.

_____ Location and type of fire suppressant systems equipment.

_____ The availability and requirements of using personal protective equipment.

_____ Location of first aid cabinet and steps to follow in the event of an injury.

_____ The physical and health hazards of the following hazardous chemicals which are in the work place:

- (1) Bottled Gases -Nitrogen, Hydrogen, Oxygen, Argon, Ammonia, Acetylene, Propane and Methane
- (2) Heat Treat Salts – Molten, Solid and Dust
- (3) Quench Oil, Machine Oils and Mineral Spirits
- (4) Methyl Chloride
- (5) Hot Water
- (6) Blasting Grit and Dust
- (7) Battery Acid
- (8) Grinding Wheels and Welding Rods – Resultant Dust and Fumes
- (9) Heat

I certify that I have received training in the above indicated items.

Employee _____ Date _____

I certify the above named employee has been trained in the items listed above.

Safety/Environmental Manager _____ Date _____

SUN STEEL TREATING INC.
"CONSUMER USE" MATERIALS
04/03/2013

"CONSUMER USE" CAN BE DEFINED AS MATERIALS WHICH CAN BE PURCHASED BY THE
ORDINARY HOUSEHOLD CONSUMER, AND WHICH ARE USED FOR THE INTENDED PURPOSE AND
AMOUNT AS BY THE ORDINARY HOUSEHOLD CONSUMER.

| <u>COMMON NAME</u> | <u>SUPPLIER</u> | <u>LOCATION/USE</u> |
|---------------------------------|---------------------------|-------------------------------|
| Batteries - Silver Oxide - All | Grainger | Throughout Shop |
| Battery - Nic/Cad Rechargeable | Grainger | Throughout Shop |
| Calgon Water Softener | | Maintenance |
| Contact Cement | | Maintenance - Lubricant |
| Formula 409 Cleaner | Grocery Story | Maintenance - Cleaner |
| Liquid Paper | Office Express | Office |
| Marking Chalk - All Colors | | Maintenance - Chalk Lines |
| Misty Citrus | | Maintenance - Cleaner |
| Motor Oil 15W-40 | South Lyon Parts Plus | Customer Service - Trucks |
| Paint - Acrylic Safety Hi-Gloss | Grainger | Throughout Shop - All Colors |
| Paint - Alkyd Safety Hi-Gloss | Grainger | Throughout Shop - All Colors |
| Paint - Metal Primer | Grainger | Throughout Shop |
| Paint - Red Primer | Grainger | Throughout Shop |
| Paint Markers | Grainger | Maintenance - Labeling |
| Paint - Spray | Grainger | Maintenance - Throughout Shop |
| Print Cartridges (6 different) | Michigan Office Solutions | Office |
| PVS Purple Primer | Peters True Value | Maintenance - Paint |
| Raid Commercial Insect Killer | | Maintenance - Insect Killer |
| Raid Insect Killer - Formula 7 | | Maintenance - Insect Killer |
| Red Marker | Office Express | Office |
| Table Salt | Grocery Store | Heat Treat - Water Quench |
| Typewriter Ribbon | Office Express | Office |
| White-Out - SEE LIQUID PAPER | | |
| Windshield Washer Solvent | South Lyon Parts Plus | Customer Service - Trucks |

