

# Jay Industries, Inc. Hazard Communication Plan

**Scope:** This plan covers all work operations at Jay Industries, Inc., where employees may be exposed to hazardous chemicals, in compliance with OSHA Hazard Communication Standard, 29 CFR 1910.1200.

**Broshco Fabricated Prod.**  
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Mansfield, OH 44906

**Sarca Manufacturing**  
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Mansfield, OH 44902

**Kronis Coatings**  
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## POLICY STATEMENT

Jay Industries, Inc., strives to reduce employee exposure to hazardous chemicals and the overall incidence of chemical-related injuries and illnesses. All employees who are potentially exposed to hazardous chemicals in their assigned jobs will be fully informed of the hazards of the chemicals and of protective measures to minimize exposure to these chemicals. Information will be made available to employees by means of labels on chemical containers, safety data sheets (SDS), and on the job training. Employees will be informed of any known hazards associated with chemicals to which they may be exposed before their initial assignment, whenever the hazards change, or when new hazardous chemicals are introduced into their respective work areas.

## PURPOSE

The purpose of this plan is to establish procedures for the safe use of hazardous chemicals at Jay Industries, Inc.

## PLAN ADMINISTRATION AND RESPONSIBILITIES

The **Program Administrator** is the Environmental, Health, and Safety Director, who is responsible for implementing the GHS Hazardous Communications Plan, including reviews and updates of the plan

The **Departmental Supervisors**, with support from the EHS Department, are responsible for Chemical Labeling and Employee Training. This includes the proper labeling of all containers of hazardous chemicals, in compliance with current laws; updating and maintaining clear, readable, compliant labels; and informing and training employees and outside contractors concerning hazardous chemicals in their work areas.

The **EHS Department** is responsible for maintaining and updating the Safety Data Sheet system and ensuring that hazardous chemical information is available in the work area, in compliance with current law.

The **EHS Department** is responsible for periodically reviewing and updating the Plan. It must be reviewed whenever new hazards are introduced into the workplace and when there are legal or regulatory changes.

The **Human Resources Department** is responsible for maintaining employee training records.

### Plan Availability

Copies of the plan, including the video training program, are available upon request to employees, their designated representatives, or any safety and health regulatory agency. They may be made from the company intranet site or requested from the EHS Department.

### Labeling Review

The **EHS Department** will review and update labeling procedures, as required.

## DEFINITIONS

*Chemical*—any substance, or mixture of substances.

*Hazardous chemical*—any chemical that is classified as a physical hazard or a health hazard, a simple asphyxiant (i.e., displaces oxygen in the ambient atmosphere), combustible dust, pyrophoric gas (i.e., gas that will ignite spontaneously in air at 130 degrees Fahrenheit or below), or hazard not otherwise classified.

*Chemical label*—an appropriate group of written, printed, or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical or to the outside packaging, with the specified pictogram, hazard statement, signal word, and precautionary statement for each hazard class and category.

*Safety data sheet (SDS)*—a written description of a hazardous chemical or chemical product in a 16-section format that contains comprehensive technical information about a particular substance and explains the risks, precautions, and remedies to exposure related to the chemical.

## LABELING OF CONTAINERS

All containers with hazardous chemicals will be labeled. Each container will include either:

- The label shipped with the chemical container; *or*
- A label, tag, or marking with product identifier and combination of words, pictures, or symbols that provide general information regarding the hazards of the chemicals and information about the physical and health hazards of the chemical.

### **In-House Container Label System**

Where in-house labels on containers replace the original labels provided by the chemical supplier, they must include the following categories of information:

**Pictogram** - a symbol on a white background within a red diamond. There are nine pictograms under GHS, however only eight pictograms are required under the HCS. Workplace labels may use a black border instead of red.

**Signal Words** – a single word on the label used to indicate the relative level of severity of a hazard and alert the reader to a potential hazard. The signal words used are “Danger” for the more severe hazards, while “Warning” is used for less severe hazards.

**Hazard Statement** – a statement assigned to a hazard class and category that describes the nature of the hazards of a chemical, including, where appropriate, the degree of hazard. For Example: Highly flammable liquid and vapor.

**Precautionary Statement** – a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical. This may also include proper storage or handling of a hazardous chemical and first aid instructions.

**Name and Address** – of the chemical manufacturer, importer, distributor, or other responsible party.

The in-house labeling system is designed according to the NFPA or revised HMIS labeling system.

### **Portable Containers**

When hazardous substances are transferred from a labeled container into a portable container, used within ONE work shift, and under the control of the employee who performs the transfer, the container need only be labeled with enough information that will allow someone to locate the original manufacturer's label or SDS.

However, if the chemical transferred to the portable container is not used within a work shift and is not under the control of the employee who performs the transfer during their shift, then labeling is required.

### **SAFETY DATA SHEET (SDS)**

SDS sheets are obtained from the manufacturers/suppliers for all chemicals and materials prior to their use at any facility. Any employee receiving an SDS shall forward it to the EHS Department, to insure that it is properly entered and maintained for access and communication with affected employees.

#### **SDS Access**

SDSs will be readily available to all employees during each work shift. The primary method for accessing SDS information in the work area is the PLEX Computer system. The back-up system is the Jay Industries Intranet site. Hard copies of all SDSs will be maintained at the EHS Office.

#### ***Primary SDS Access System***

1. From any Jay Industries computer, log into PLEX
2. On the work screen at the bottom right is a button titled "MSDS"
3. Click on the button and use the search feature to find the SDS using chemical name, partial chemical name, manufacturer, etc.

#### ***Backup SDS Access System***

The back-up system contains MSDS and SDS information through June 1, 2015. It can also be used by employees to access information.

1. From any Jay Industries computer go to the intranet site
2. Click on EHS on the lower right side of the page
3. Click on (M)SDS
4. Click the division where the chemical is being used
5. Search for the chemical either by Manufacturer or by Product Name

### ***Secondary Backup SDS System***

If the computer systems fail, the EHS Department retains a hard copy of every MSDS and SDS. The steps for accessing the SDS hard copies are:

1. Contact the EHS Department by email or by phone 419-521-0338.
2. Ensure that you relay the name of the division, name of the product, and name of the manufacturer to the administrator.

### **SDS Not Available**

If an SDS is not available, or an employee has a problem accessing a SDS, the employee will contact the EHS Department or Departmental Supervisor. The missing SDS will be provided to the employee requesting it by the employee's next work shift at the latest, unless the SDS has not been received from the chemical supplier.

If an SDS is not received at the time of initial shipment, the EHS Department will contact the supplier, in writing, to request the SDS. If an SDS is not received from the supplier within 15 days after the written request is sent, the appropriate government agency will be contacted for assistance in obtaining the SDS.

## **EMPLOYEE TRAINING AND INFORMATION**

### **Employee Information**

Each employee will be informed about:

- The duty of the employer to provide information and training about chemical hazards, chemical labeling, SDSs, and protective measures
- The hazardous chemicals present in the employee's work area
- The location and availability of the written hazard communication program, list of hazardous chemicals, and SDSs

### **Initial Employee Training**

Every employee will receive initial training on the GHS Hazard Communication System.

### **Training Content and Format**

Each new employee will receive information and training that covers:

- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps taken to prevent exposure to hazardous chemicals
- Procedures to follow if employees are exposed to chemical hazards
- How to read and interpret chemical labels and SDSs

Training will be delivered through a combination of hands-on demonstration, audiovisuals, video, and classroom instruction.

### **Retraining**

Additional training will be conducted when new chemicals are introduced into the work area. Retraining is not required if the new chemical contains hazards similar to previously existing chemicals for which training has already been conducted.

### **Training Records**

All employees attending hazard communication training sessions must sign a sheet at the end of their class to record their attendance or complete a quiz and certification. Training records will remain on file with the HR Department in the appropriate Division.

## **NONROUTINE TASKS INVOLVING HAZARDOUS CHEMICALS**

The Departmental Supervisor of an employee performing a non-routine task, such as cleaning machinery or equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazardous chemicals associated with the non-routine task. Employees share this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed. Upon request by an employee, the Departmental Supervisor will provide the employee with information about the hazardous chemicals that may be encountered during the non-routine activity.

## **INFORMING OTHER EMPLOYERS OR CONTRACTORS**

When employees of other employers or Contractors are working at a Jay Industries site, they will be provided with information about hazardous chemicals that their employees may be exposed to on a jobsite and precautionary protective measures for their employees. The Maintenance Manager or Departmental Manager engaging the outside employees or Contractors is responsible for the communication process.

Employees of other companies or Contractors are required to inform this organization of any hazardous materials they will be bringing on site, and they are required to supply the EHS Department with a copy of the SDS for the hazard. The Maintenance Manager or Manager engaging the outside employees or Contractors will obtain information about hazardous chemicals used by other employers or contractors to which employees of this organization may be exposed.

Also, other employers will be informed about container labels used by the organization. Where labeling systems are used that are not the original container labels, the employees of other employers or contractors will be provided with information explaining the labels used for hazardous chemicals to which they may be exposed.

## LIST OF HAZARDOUS CHEMICALS

A list of all known hazardous chemicals used in work areas is available on the company intranet site or the EHS Department.

The list will include each chemical's product identifier (the name or number used to identify the chemical), the manufacturer, and the product name. Detailed information about each chemical may be obtained from the SDS for that chemical.

When new chemicals are received, the chemical list will be updated within 30 days. To ensure any new chemical is added to the list in a timely manner, all Departmental Supervisors or Managers must forward the SDS of any new chemical brought on site to the EHS Department. If an SDS is not available with the shipment an email must be sent to the EHS Department stating the division where the chemical is located, the name of the manufacturer, and the name of the product. The hazardous chemical list is compiled and maintained by the EHS Department, in compliance with current laws.

## BULK TANKS

All Bulk Tanks will be labeled with an updated HMIS or GHS HAZ COM Label.

## Revision History

|          |              |                 |
|----------|--------------|-----------------|
| 9/18/13  | Created Plan | Allen Wheeler   |
| 03/03/16 | Updated Plan | Marijan Grogoza |
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