

**QP Energy Services LLC**  
**Hazard Communication Program**

**HSE Manual Section 5**

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## 1.0 Reference Standard

Occupational Safety and Health Administration: 29 CFR 1910.1200, Subpart Z - Hazard Communication

## 2.0 Purpose

This procedure establishes minimum requirements for the following:

- Identification and labeling of hazardous chemicals.
- Employee access to hazardous chemical information.
- Training required to prevent injury or illness due to hazardous chemical exposure.

## 3.0 Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, as well as all other individuals who are visiting or have business with our company.

## 4.0 Responsibilities

Management is responsible for identifying hazardous substances and for maintaining this program. Management will review this procedure at least annually and when new hazardous substances are introduced.

Management and supervisors are responsible for the implementation and enforcement of this program.

Employees must comply with all procedures outlined in this policy.

Contractors and vendors shall comply with all procedures outlined in this policy.

## 5.0 Definitions

**Article:** A manufactured item other than a fluid or particle:

- Which is formed to a specific shape or design during manufacture;
- Which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- Which under normal conditions of use does not release more than very small quantities (for example: minute trace amounts of a hazardous chemical and does not pose a physical or health risk to employees).

**Chemical:** any element, chemical compound or mixture of elements and/or compounds.

**Container:** any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

**Contractor:** A non-company employee being paid to perform work in our facility.

**Hazardous Chemical:** a chemical that is a physical or a health hazard.

**Health Hazard:** A chemical that is carcinogenic, toxic, a reproductive hazard, an irritant, a corrosive, a sensitizer, or damages anybody system or part.

**Safety Data Sheet (SDS):** An SDS is a written document prepared by the chemical manufacturer or supplier that details the contents, hazards, proper use directives and emergency response protocol for a hazardous chemical.

**Physical Hazard:** A chemical which is a combustible liquid, a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable, or water reactive.

**Vendor:** A non-company employee performing a service in our facility.

## 6.0 Program Application

This program will be applicable to all chemicals that exhibit or could exhibit health hazards or physical hazards under normal operating conditions or during emergencies. However, the following materials are exempt from this program:

- Consumer products when used in the workplace in a duration and frequency that is not greater than that experienced by a regular consumer;
- Articles (see Definition above);
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (for example, tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (such as over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (for example, first aid supplies);
- Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- Wood or wood products that will not be processed (wood treated with hazardous chemicals, or that will be processed generating dust are not exempt);
- Food and alcoholic beverages in retail establishments and food that will be consumed in the workplace; and
- Tobacco and tobacco products.

## 6.1 Procedures

### 6.1.1 Material Ordering and Hazard Determination

Any employee wishing to introduce a new chemical into the facility must obtain an SDS and submit the SDS to the program administrator prior to ordering the chemical. The program administrator will evaluate all new or replacement chemicals to determine if the chemical presents health hazards for our employees or to our facility.

If the program administrator determines that the new chemical cannot be handled safely, the chemical will not be ordered. Information on new chemicals, or new information pertaining to chemicals that are currently used, will be communicated to affected employees by the program administrator. Every effort will be made to select chemicals that are not hazardous or that present the minimum degree of hazard commensurate with necessary chemical capability.

### 6.1.2 Hazardous Chemical List

A list of hazardous chemicals currently used within the facility will be maintained by the program administrator (see Appendix A for the Hazardous Chemical Inventory). As new chemicals are purchased, the necessary information will be added to the Inventory. Obsolete chemicals will be removed from the List.

### 6.1.3 Safety Data Sheets

A SDS will be maintained for all hazardous chemicals, including those purchased at retail locations. The SDS will be available to all employees on all shifts. If our plant decides to use electronic means to maintain the SDS file, employee availability will be assured including at all times including during power failures.

The program administrator will contact the chemical supplier or manufacturer and request an SDS for chemicals held in quarantine or refused by receiving.

The SDS file and Hazardous Chemical List will be maintained in the following location(s):

- Yard Storage Containers
- All QP Vehicles

Obsolete SDS will be removed from the active file and will be maintained in a separate file by the program administrator for 30 years.

### 6.1.4 Labels and Other Hazard Warnings

All containers containing hazardous chemicals will be labeled with the following information:

- Product Identifier: The chemical's name and a list of the substance(s) it contains.
- Supplier Information: Name, address and phone number of the chemical's manufacturer or supplier.
- Pictogram: A symbol inside a diamond with a red border, denoting a particular hazard class.
- Precautionary Statement: One or more phrases that describe recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling of a hazardous chemical.
- Signal words: A single word used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. The signal words used are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for less severe hazards.
- Hazard Statement: A phrase assigned to each hazard category; examples include "harmful if swallowed," "highly flammable liquid and vapor," etc.

Solid metal, wood and plastic not exempted as articles, as well as grain will not be labeled but will have label information available within the SDS.

All incoming hazardous chemicals containers will be inspected by receiving personnel. Containers that are not properly labeled will be labeled by the receiving personnel. Containers with hazardous contents that are not listed on the Hazardous

Chemical List will be refused or will be placed in quarantine and the program administrator notified immediately.

The program administrator must approve all labels used within our facility. Each departmental supervisor is responsible for insuring that all hazardous chemical containers, including containers that are refillable from bulk containers, are labeled properly and that the label is visible. Stationary tanks, reservoirs and sumps containing hazardous chemicals will also be labeled.

Labels will not be removed or covered over.

## 7.0 Training

Training as outlined below will be provided at the following times:

- At time of initial assignment;
- Whenever a new hazardous chemical is introduced, or when the hazard information regarding a currently used chemical changes or when the program elements change; and
- Whenever the program administrator or other management members determine through observation that retraining would be beneficial.

Training will consist of a(n):

- Overview of this program;
- Review of operations where hazardous chemicals are present;
- Location of the written hazard communication program, hazardous chemical list and SDS file;
- Methods and observations used to detect the presence or release of hazardous chemicals;
- Physical and health hazards of chemicals in the work area (Note: we will present categories of hazards and advise employees to review labels and SDS for chemical specific information);
- Measures that employees are required to take to protect themselves from hazards including: procedures, work practices, emergency procedures and personal protective equipment requirements; and
- Explanation of the labeling system and how to read an SDS so that this information can be used appropriately by all personnel.

### 7.1 Non-Routine Tasks

Whenever a non-routine job involving work with hazardous chemicals is required, special training will be provided for all affected employees prior to the job. The training will include:

- Hazardous chemicals to be used in the non-routine task;
- Protective measure required to perform the work safely;
- Emergency procedures; and
- An opportunity to ask questions or ask for additional information

## 8.0 Contractors

Contractors who will bring hazardous chemicals into our facility must:

- Provide the program administrator with a list and an SDS for each hazardous chemical that will be used in our facility;

- Maintain a copy of the SDS for each approved chemical on site;
- Not bring chemicals into our facility unless approved by the program administrator; and
- Comply with all provisions of the Hazard Communication Standard that is applicable to their company.
- Our Company reserves the right to refuse the use of chemicals based upon our evaluation. We also reserve the right to terminate the use of chemicals at any time based upon variable conditions within our facility.
- Contractors will be provided the following information whenever their work location could bring them into contact with our hazardous chemicals.
- Know the hazardous chemicals that they may be exposed to while performing the specified work and how to obtain a copy of appropriate SDS
- Practice the necessary job precautions to work safely within the proximity of the chemicals involved.

## 9.0 Revision History Record:

Revision Number	Section	Revised By	Description
0	NA	NA	Original document.

# Appendix A

