

Satilla REMC

Hazard Communication Plan

Complying With

OSHA Standard 29 CFR 1910.1200

Revised: January 2024

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Scope

This Hazard Communications Plan applies to all Satilla REMC employees who may be exposed to hazardous substances known to be present during normal working conditions or that may be present in a foreseeable emergency. Satilla REMC does not manufacture, mix or directly import chemical products.

Purpose

Provide a comprehensive written plan to assure implementation and assign responsibility for each requirement of the Federal Regulation.

Responsibility

Satilla REMC's Manager of Loss Control & Facilities is the Hazard Communication Coordinator (hereafter, H.C.C.) and is responsible for performing the functions detailed herein or identifying and assigning the responsibilities to specific site personnel.

Written Plan

Satilla REMC maintains this document as its written Hazard Communication Plan (hereafter, the Plan). It is updated as necessary to reflect changes in regulatory requirements (See Appendix 4) or work practice changes that might alter the employee exposure potential. It is available for review by employees and appropriate Department of Labor representatives.

List of Chemical Products

A listing of all hazardous products stored or used at Satilla REMC has been compiled. It is updated as Safety Data Sheets are received with initial shipments and reviewed by the H.C.C. to ensure its accuracy.

Safety Data Sheets

A current Safety Data Sheet (SDS) has been obtained for each substance listed on the inventory of hazardous products. An evaluation of each chemical has been performed to determine if it is a hazardous chemical subject to the requirements of the OSHA Hazard Communication Standard (hereafter, the Standard). The evaluation of the manufacturer or importer has been relied upon for this determination. It is cross-referenced by both product name and manufacturer. The H.C.C. has performed a review to ensure a current SDS is available for each chemical product on the list. These SDSs have been placed in a binder and are available to the employees during the shift they are working. After leaving the headquarters location, emergency information is available by contacting the Operations Control Center.

Labeling

Satilla REMC does not manufacture, mix or import chemicals and therefore depends on the label on the product at the time it is purchased or acquired. If a chemical is transferred to another container, it is properly labeled unless only the employee dispensing the product uses it. All products received are checked to ensure they are properly labeled when received and all employees are instructed during training sessions in the importance of maintaining a legible label during the life of the product.

Products are not transported through piping systems on Satilla REMC property.

Contractors

Satilla REMC personnel monitoring the activities of contractors make available to the contractors a SDS for all products provided by Satilla REMC. The contractors also have the responsibility to provide the appropriate Satilla REMC representative with a copy of the SDS for all hazardous products they bring on site.

Training

Prior to beginning work, employees are provided with information and training about the physical and health hazards of chemicals they work with and measures they may take to protect themselves from unnecessary exposure. This training includes the hazards associated with tasks that may not be performed routinely. Additional training is provided when a new product is introduced into the workplace or when the hazard changes. Supervisors have been instructed to observe employees using chemical products and additional training is provided when observations of employees using and handling products indicate a need. Refresher training consisting of an overall review of the Plan and training on reading and understanding the information on an SDS is conducted annually.

Training Documentation

Although not required by the Standard, training records are kept detailing the name of the instructor, location, date and time of training, employees attending the training session and a list of topics discussed .

Appendix 1

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Appendix 2

Satilla REMC Plan Approval

Satilla REMC's Hazard Communication Written Plan
29 CFR 1910.1200

Approved: Romero A. Reyes 1-2-24
President/CEO Date

Approved: Scott L. [Signature] 1-2-24
Loss Control Coordinator Date

Appendix 3

Plan Implementation Details

The following details define the actions to be taken to ensure the continued effective implementation of the Hazard Communication Plan at Satilla REMC.

1. **Written Plan**

Satilla REMC will maintain a current written Hazard Communication Plan. This is a continuous and on-going program. The Plan details how requirements of the Standard are implemented and actions that will ensure the program remains effective. The Plan is available to employees and appropriate Department of Labor representatives.

2. **List of Chemical Products**

Satilla REMC has developed and maintains Satilla REMC's list of potentially hazardous products. Activities to ensure a complete and up-to-date list are:

a. Conducting of a complete inventory of chemical products used and/or stored at Satilla REMC.

b. Identifying of all materials that are by definition hazardous by reviewing chemical labeling provided by the manufacturer of the product or other label that specifically identifies any hazards associated with the product.

c. Removing of obsolete or duplicative chemicals from stock, and replacing of hazardous chemicals with non-hazardous chemicals if practical.

d. Notifying of all employees of their responsibilities to obtain SDSs and notify the Control Center and H.C.C. when new chemical are purchased and introduced within the Satilla REMC workplace.

3. **Acquisition of Safety Data Sheets**

a. Manufacturers and distributors should include a current SDS with the first shipment of a chemical product. Revised SDS's should also be received with subsequent shipments. Employees receiving chemicals at Satilla REMC must require that these sheets be received and cataloged in the Control Center. The H.C.C. or his designee must obtain any missing SDS through the manufacturer or other means such as the through the manufacturer's website.

b. Satilla REMC will generally rely on the evaluation and determination of the chemical by the manufacturer and importer and the use of the Safety Data Sheet (which they provide). Using the SDS's, Satilla REMC will identify substances determined to be hazardous.

c. Satilla REMC shall maintain the list of Safety Data Sheets in the Operations Control Center for ready access to each employee. District office employees and employees who have left the office can access SDS information by phone from the Control Center Operator 24 hours per day.

Exemptions: The following items are exempt from the provisions of this program:

- a. Toxic products used in the workplace, which could reasonably be expected to be found in the home in the same quantity and formula, and will not result in a frequency or exposure greater than experienced in home use;
- b. Hazardous waste, which is regulated by the Environmental Protection Agency's Resource Conservation and Recovery Act (RCRA);
- c. Food, drugs, or cosmetics on the property for the personal use of the employees of Satilla REMC.
- d. Wood or wood products. Not exempted are hazardous substances used in conjunction with wood or wood products; and
- e. Tobacco or tobacco products.

4. Labeling Requirements

Satilla REMC ensures that a labeling procedure has been implemented to cover the proper labeling of storage and temporary use containers.

- a. Satilla REMC ensures that containers are labeled tagged or marked with the identity of the material and appropriate hazard warning. Satilla REMC will rely on the labels provided by their suppliers. Each container of a hazardous product shipped to Satilla REMC for use or storage shall contain a label with at least the following information: Identity of the chemical, appropriate health warnings, the target organ and the effects of the chemical, the appropriate health warning, and the name and address of the chemical manufacturer, importer, or other responsibility party.
- b. If the material is transferred from a labeled container to another container, the employee making the transfer will label that container unless it is only for the use on the shift when/where it was transferred.
- c. Satilla REMC employees are responsible for ensuring that the labels are maintained as required on the containers in Satilla REMC facilities and that newly purchased materials are checked for labels prior to use.

Exceptions to Labeling Requirements: This section does not require labeling of the following chemicals when subject to the labeling requirements of other regulatory acts and agencies:

- a. Any pesticide as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act;

- b. Any chemical substance or mixture as such terms are defined in the Toxic Substances Control Act;
- c. Any food, food additive, color additive, drug, cosmetic, or medical or veterinary device or product, including materials intended for use as ingredients in such products (e.g. flavors and fragrances), as such terms are defined in the Federal Food, Drug, and Cosmetic Act;
- d. Any distilled spirits (beverage alcohol), wine, or malt beverage intended for non-industrial use, as such terms are defined in the Federal Alcohol Administration Act;
- e. Agricultural or vegetable seed treated with pesticides and labeled in accordance with the Federal Seed Act;
- f. Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976;
- g. Tobacco or tobacco products;
- h. Wood or wood products, including lumber which will not be processed, where the chemical manufacturer or importer can establish that the only hazard they pose to employees is the potential for flammability or combustibility (wood or wood products which have been treated with a hazardous chemical is covered by this standard, and wood which may be subsequently sawed or cut, generating dust, are also not exempted);
- i. Food or alcoholic beverages, which are sold, used, or prepared in a retail establishment (such as a grocery store, restaurant, or drinking place), and foods intended for personal consumption by employees while in the workplace;
- j. Any drug intended for personal consumption by employees while in the workplace (e.g., first aid supplies);
- k. Cosmetics, which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- l. Any consumer product or hazardous substance where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended;
- m. Ionizing and non-ionizing radiation; and
- n. Biological hazards.

5. **Warehouse Employees**

Employees whose job responsibility requires them to work around or handle stored hazardous products shall be given the information and training to protect them from a spill or leak from a sealed container.

6. **Contractor Employees**

Satilla REMC personnel monitoring the activities of contractors working in the Satilla REMC's area shall provide an SDS for all products that contract personnel may be exposed to during the course of their work. The contractors also have the responsibility to provide the appropriate Satilla REMC representative with a copy of the SDS for all hazardous products they may bring on site. The contractor shall also be provided with information about the labeling system in use on Satilla REMC's system, and provide to Satilla REMC information about the labeling system they use for products to be used during the course of their work on Satilla REMC's premises or property.

7. **Responsibility**

It is the responsibility of each employee whose work assignments place them in contact with or in close proximity to hazardous substances to be aware (through training, SDS and the Plan) of the potential risks, safety precautions, personal protective equipment, first aid requirements and labeling requirements associated with each hazardous substance. The employee's work activities shall be periodically monitored to ensure that his/her performance meets the requirements of the Standard.

The employee must also notify the H.C.C. when he/she encounters a chemical product at Satilla REMC that is not identified in Satilla REMC's list of chemicals.

8. **Employee Information and Training**

a. Prior to beginning work and whenever a new product is introduced into the workplace, Satilla REMC employees who use or handle chemical products must be trained in their rights and responsibilities under the law, as well as the proper use, handling and spill cleanup for the products they use. This includes employees who could be potentially exposed to hazardous products in the course of their work or in a foreseeable emergency including employees working in warehouses where hazardous materials are received, handled or stored.

b. Satilla REMC employees will be made aware of specific operations in the workplace where hazardous substances are present.

c. Satilla REMC employees who supervise other employees shall receive extensive training in the administration of the Plan as well as assist in the training of employees they supervise. Training will enable them to monitor compliance to the program as well as answer questions asked by the employees.

d. Employees who work with or could potentially be exposed to hazardous substances in the workplace, shall be trained regarding their rights and responsibility under the Hazard Communication program, 29 CFR 1910.1200.

e. Employees shall be familiar with the content and location of the Plan, list of products, labeling requirements and SDSs required under the Plan.

f. Prior to beginning work, Satilla REMC's employees shall be trained in the physical and health hazards of the chemicals in the workplace, the measures they can take to protect themselves from the hazards including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals. The employee shall also know the proper use, care and handling of the product, as well as the appropriate spill and cleanup precautions. This will include the requirements for personal protective equipment, appropriate work practices and emergency procedures. Employees shall be trained either by reviewing each individual SDS or by grouping and training by hazard category.

g. Satilla REMC's employees shall be trained in methods and observations that may be used to detect the presence or release of hazardous chemicals in the work area such as monitoring devices by the employer, continuous monitoring devices, visual appearance or odor of hazardous products being released.

9. Follow-up Training

a. Follow-up training shall be held anytime a new product is introduced into the workplace, or observations of employees using and handling products indicate a need for additional training.

b. Follow-up training shall include information about any new product introduced into the workplace as well as the work operation where the new hazard was introduced.

c. Follow-up training shall include the physical and health hazards of the new product.

d. Follow-up training shall include methods employees can use to protect themselves from the hazards of the new chemical, including specific procedures that have been implemented, work procedures, emergency procedures, and personal protective equipment.

10. Training Documentation

Although this is basically a performance standard, a record of training shall be kept as follows:

- a. Name of the Instructor;
- b. Name of each employee trained;
- c. Location, date and time, where training was held; and
- d. Subjects and products covered in the training

Appendix 4

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OSHA Hazard Communication Standard 29 CFR 1910.1200