

FFPO Procedure Blue Sheet Form

A. Procedure Title (list manual, procedure series, or specific procedure #)

SPR Accident Prevention Manual
Section 23 Hazard Communication Program

B. Procedure Name/series type (i.e., operations, maintenance, etc.) E S & H

C. Check (✓) one of the following:

1. Procedure(s) accepted “as is” with terminology replaced as denoted in the Site Procedures Approved Terminology Replacement List for the FFPO SPR M&O contract.

2. In addition to the changes in approved terminology for the FFPO SPR M&O contract, improvements to the procedure are warranted:

- Category 1 Finding (Resolution prior to contract start)
 Category 2 Finding (Resolution within 90 days of contract start)
 Category 3 Finding (Resolution to the Issues Management program)

D. Comments/Notes:

E. Forward a copy of this form to the FFPO Director, Business Management for revision tracking.

Signed

FFPO Reviewer Signature

02/26/14

Date

Steve Mahan

FFPO Reviewer Print Name



Site Procedures Approved Terminology Replacement List

Approved Terminology Replacements	
Terminology to be Replaced	Substituted Verbiage
AGSC	M&O Contractor or MOC
Boeing	M&O Contractor or MOC
Construction Management Services or CMS contractor	M&O Contractor or MOC
DynMcDermott or DM or Company	M&O Contractor or MOC
DM Contract No.	M&O Contract
Organizational Changes	
William Gibson or "Hoot"	DOE Project Manager or DOE PM
Robert (Bob) McGough or DM Project Manager or CEO	MOC Project Manager or MOC PM
Randy Sutton (Acting) or DM General Counsel	MOC General Counsel or MOC GC
Scott Landry or DM APM, O&M and COO	MOC APM, O&M
APM, Cavern Integrity	Senior Director, Cavern Integrity
Colleen Yates or DM APM, Business Operations and CFO	MOC APM, Business Operations and CFO
APM, Security and Emergency Preparedness or Director, Security and Emergency Preparedness Division	Senior Director, Security & Emergency Preparedness
Henry Schmidt, Jordan Jones, or Duane Johnson	Senior Director, Security & Emergency Preparedness
Leslie Williams or APM, Data Systems or Data Systems Director	Senior Director, Data Systems
William Bozzo or DM APM, ES&H	MOC APM, ES&H
Walt Newcomb or DM Director, Energy & Sustainability	Director, Environmental
J.P. Martinez or DM APM, Engineering	MOC APM, Engineering

ACRONYMS

AGSC	ASRC Gulf States Constructors
APM	Assistant Project Manager
ASRC	Arctic Slope Regional Corporation
CAS	Contractor Assurance System
CFO	Chief Financial Officer
COO	Chief Operating Officer
ES&H	Environment, Safety, and Health
GC	General Counsel
M&O	Management and Operating
MOC	Management and Operating Contractor
O&M	Operations and Maintenance
PM	Project Manager

23. HAZARD COMMUNICATION PROGRAM

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23.1. INTRODUCTION

This section establishes the requirements and responsibilities of the M&O contractor under 29CFR1910.1200, "Hazard Communication." Its purpose is to ensure that the hazards of all chemicals used on site are evaluated, and that information concerning the hazards is transmitted to employees. Employers are required by law to provide information to employees about the hazardous chemicals known to be present in the workplace under normal conditions of use or in a foreseeable emergency. This information is to be communicated through labeling and other forms of warning, Material Safety Data Sheets/Safety Data Sheets (MSDSs/SDSs), information distributed to employees, and training.

NOTE

DM is in the process of complying with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

Requirements to comply with the GHS system for distributors are in effect in 2015 and for employers by June 1, 2016. DM will meet the employers' deadline.

NOTE

This section applies to all M&O contractor employees and subcontractor personnel working at an SPR facility under direct DM supervision. All contractors working on the SPR facilities are required to submit MSDSs/SDSs to DM Environmental and to DM Safety and Health for review for any chemical they bring on site that is not on the Qualified Products List (QPL). MSDSs/SDSs **must** be submitted, reviewed, and approved for use prior to bringing the chemical on site.

23.2. REQUIREMENTS OF THE HAZARD COMMUNICATION STANDARD

23.2.1. Written Hazard Communication Program

This section is a written program established to provide information on container labeling, obtaining and using MSDSs, and the employee information and training program. In addition, the "Hazard Communication Program" requires that documentation be maintained for the following:

- a. A chemical inventory listing chemicals known to be present using an identity that is referenced on the appropriate MSDS in each work area.
- b. The procedures used and hazards involved with nonroutine tasks, such as confined space entry or pigging operations.
- c. The hazards associated with chemicals in unlabeled pipes.
- d. How the M&O contractor informs subcontractors of:
 1. Any precautionary measures needed and taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies,
 2. The labeling system used in the workplace, and
 3. The location of the MSDS/SDS for the chemicals used by the M&O contractor that employees may be exposed to while working.
- e. The "Hazard Communication Program" is made available to M&O contractor employees or their designated representatives and DOE.

NOTE

All contractors working on SPR facilities are required to submit MSDSs/SDSs to DM ES&H for review for any chemicals they bring on site that are not already on the QPL. MSDSs/SDSs are reviewed by S&H and Environmental and either approved or disapproved for use.

23.2.2. Hazard Determination

- a. The M&O contractor will evaluate the chemicals in their workplace to determine if the chemicals are hazardous. Each chemical is evaluated for its potential to cause adverse health effects, physical hazards, or both.
- b. When evaluating chemicals, the M&O contractor consults the latest edition of the following references to establish whether a chemical is hazardous or not:
 1. "Toxic and Hazardous Substances," 29CFR1910, subpart Z, and
 2. "Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices," ACGIH.
- c. When evaluating chemicals, the M&O contractor consults the latest edition of the following sources to establish if a chemical is a carcinogen or potential carcinogen:
 1. National Toxicology Program (NTP), Annual Report on Carcinogens,
 2. International Agency for Research on Cancer (IARC) monographs on the evaluation of Carcinogenic Risks to Humans,
 3. 29CFR1910, Subpart Z, Toxic and Hazardous Substances.
- d. If a mixture has been evaluated as a whole (new chemical), the results are used to determine if the mixture is hazardous as a whole.
- e. If a mixture has not been evaluated as a whole, it is assumed to present the same hazards as components comprising one percent or greater of the mixture's weight or volume. (For

example, if carcinogenic components comprise 1% percent or greater of the mixture's weight or volume, the mixture is assumed to present a carcinogenic hazard.)

- f. Employers are not required to evaluate chemicals or mixtures unless they choose not to rely on the evaluation by the chemical manufacturer or importer. The M&O contractor relies on the evaluations of the chemical manufacturer or importer in establishing its Hazard Communication Program.

23.2.3. Labeling

- a. The M&O contractor is responsible for ensuring that each container of chemicals used in the workplace is labeled in the GHS format by 2015 and after in compliance with the OSHA requirement. This format will include: with the product identifier, signal word(s), hazard statement, pictogram (with red border), precautionary statement, and the name and the address of the chemical manufacturer, importer, or other responsible party.
- b. Vendors/suppliers of purchased materials must ensure that appropriate content and warning labels are attached to containers in order for the contracted purchase to be deemed payable. Note: The shipment may be returned unless this requirement is met.
- c. M&O Property ensures that the labels or other forms of warning are legible and prominently displayed on the incoming containers of hazardous chemicals and ensures that labeling updates are provided to user departments.
 1. Proper container labeling in the workplace is audited by site management, employees, and the Site Safety Specialist on an informal, day-to-day basis and during formal assessments.
- d. Each employee who transfers materials from labeled containers to unlabeled containers is responsible for properly labeling the unmarked container in the GHS format as to its contents and associated hazard when a hazard exists.
- e. Labeling is not required on portable containers into which hazardous chemicals are transferred from labeled containers and that are intended only for the immediate use (that is, during the same shift) by the same employee performing the transfer.

23.2.4. Material Safety Data Sheets/Safety Data Sheets

The M&O contractor will have a MSDS/SDS for each hazardous chemical on site.

- a. The MSDS/SDS will contain at least the following information:
 1. The identity used on the label.
 2. The chemical and common names of all ingredients that have been determined to be health or physical hazards and comprise one percent or greater of the composition, except if carcinogens. (Note: Carcinogens will be listed if the concentrations are 0.1 percent or greater.)
 3. The physical and chemical characteristics of the hazardous chemical, such as vapor pressure and flash point.
 4. The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions that are generally recognized as being aggravated by exposure to the chemical.
 5. The primary routes of entry to the human body (inhalation or absorption, for example).
 6. The OSHA permissible exposure limit, ACGIH Threshold Limit Value, and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the MSDS/SDS, where that information is available.
 7. Whether the hazardous chemical is listed as a carcinogen or potential carcinogen.

8. Any generally applicable precautions for safe handling and use that are known to the chemical manufacturer, importer, or employer preparing the MSDS/SDS, including appropriate hygiene practices, protective measures during repair and maintenance of contaminated equipment, and procedures for cleanup of spills and leaks.
 9. Any generally applicable control measures that are known to the chemical manufacturer, importer, or employer preparing the MSDS/SDS, such as appropriate engineering controls, work practices, or personal protective equipment.
 10. Emergency and first aid procedures or instructions.
 11. The date of preparation of the MSDS/SDS or the latest change to it.
 12. The name, address, and telephone number of the chemical manufacturer, importer, employer, or other responsible party preparing or distributing the MSDS/SDS, who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.
- b. DM shall ensure that:
1. Copies of the MSDS/SDS for each hazardous chemical in the workplace are accessible to employees during each work shift.
 2. A list is kept of all hazardous chemicals for which there must be an MSDS/SDS.
 3. Copies of the MSDS/SDS s are made available, upon request, to the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, and the Director of NIOSH, U.S. Department of Health and Human Services, or their designees.

NOTE

Appropriate MSDSs must be maintained for all chemicals on site. For example, if one bottle of the chemical is on the shelf for which the MSDS is on file and a second bottle is purchased and there has been a change on the MSDS, copies of both MSDSs must be on file until the first bottle is emptied and discarded.

23.2.5. Employee Information and Training**23.2.5.1. Initial Training and Information**

- a. The M&O contractor provides all employees with information and training on the hazardous chemicals in their work area at the time of their initial assignment. There is an available training course that satisfies this requirement. This information includes the following data:
 1. The existence of 29CFR1910.1200 and its requirements.
 2. Any operations in their work area where hazardous chemicals are present or used.
 3. The location and availability of the "Hazard Communication Program," including the required list of hazardous chemicals and their corresponding MSDS/SDS s.
- b. Employee training shall include (minimally) the following information:
 1. Methods and observations, such as monitoring conducted by the M&O contractor, continuous monitoring devices, visual appearance, or odor of hazardous chemicals when being released, that can be used to detect the presence or release of a hazardous chemical in the work area.
 2. Physical and health hazards of the hazardous chemicals in the work area.
 3. Measures employees can take to protect themselves from the hazards, including appropriate PPE and specific procedures that the M&O contractor has implemented to protect employees from exposure to hazardous chemicals.

4. Details of the "Hazard Communication Program," including an explanation of how to read and interpret information on the labels and MSDS/SDSs, and how employees can obtain and use the available hazard information.

23.2.5.2. Employee Information and Training on a New Hazard

- a. The M&O contractor shall provide employees with training whenever a new hazard is introduced into their work area.
 1. The employee will also be trained on his duties as outlined in this section.
 2. Training may be included in the monthly supervisor's safety meeting.

23.2.6. Hazards of Non-routine Tasks

- a. Non-routine tasks are generally performed by subcontractor employees. The subcontractor's responsibilities under 29CFR1910.1200 are covered by a contract clause as detailed in Table 23.1 and an approved hazard communication plan.
- b. Hazards associated with non-routine tasks performed by M&O employees are incorporated in the written procedures for the task (examples: confined space entry and pigging operations).

23.2.7. Trade Secrets

- a. 29CFR1910.1200 provides limited trade secret disclosure to health professionals who are providing medical or other occupational health services to exposed employees.
- b. The chemical manufacturer, importer, or employer must immediately provide the identity of a hazardous chemical to a treating physician or nurse when the information is needed to determine emergency or first aid treatment. (Note: After the emergency is abated, the requester must complete a written statement of need and a confidentiality agreement.)
- c. In non-emergency situations, the chemical manufacturer, importer, or employer is required to disclose the withheld specific chemical identity to health professionals who need the information for the following purposes:
 1. To assess the hazards of the chemicals to which employees will be exposed,
 2. To conduct sampling of the workplace atmosphere to determine employee exposure levels,
 3. To conduct pre-assignment or periodic medical surveillance of exposed employees,
 4. To provide medical treatment to exposed employees,
 5. To select or assess appropriate personal protective equipment for exposed employees,
 6. To design or assess engineering controls or other protective measures for exposed employees, and
 7. To conduct studies to determine the health effects of exposure.
- d. Requests for withheld information must be in writing and must describe with reasonable detail one or more of the needs outlined above. It must also provide a description of the procedures to be used to maintain confidentiality of the disclosed information and state that trade secret information will not be used for any purpose other than the health needs asserted.

23.2.8. Carcinogen Control

This applies to all activities conducted at the SPR where use of a carcinogen creates potential for exposure.

- a. The NO Safety and Health department will identify carcinogenic materials associated with specific job activities. Whenever possible non-carcinogenic material will be substituted.

- b. Based on workplace observations and review of MSDS/SDSs, employee exposure monitoring will be conducted to quantify employee exposures to carcinogenic materials. The monitoring results will dictate specific control measures that will be taken to reduce employee exposures to as low as reasonably achievable.
- c. Implementation plans for detectable carcinogen exposures include:
 - 1. Eliminate use of the material.
 - 2. Replace the material with a less toxic material.
 - 3. Develop specific operating procedures that will address:
 - a) Additional engineering controls
 - b) Additional personal protective equipment
 - c) Employee education
 - d) Medical monitoring
 - e) Setup of regulated areas.

23.3. TABLES: HAZARD COMMUNICATION PROGRAM

TABLE 23.1. HAZARD COMMUNICATION PROGRAM RESPONSIBILITIES	
Position or Department	Responsibility
Site Property/New Orleans Warehouse	<ul style="list-style-type: none"> a. Verify that a Material Data Safety Sheet (MSDS/SDS) is received with the initial shipment of all hazardous chemicals. If an MSDS/SDS is not received, initially contact the supplier by telephone, and if the MSDS/SDS is not immediately faxed or mailed, then initiate a Report of Discrepancy (ROD), in accordance with the procedure in the Property Management Manual, citing the missing MSDS/SDS. Keep documentation of the attempts to find the MSDS/SDS. The New Orleans Safety or Environmental departments or Site Safety Specialist may provide assistance if efforts to obtain the MSDS/SDS through the ROD action fail. Material will not be issued for use without an accompanying MSDS/SDS. b. Obtain an MSDS/SDS from an MSDS/SDS database for all hazardous chemicals procured through GSA, if the MSDS/SDS is not received with the shipment directly from GSA or from a GSA federal supply service contractor. c. Send a copy of each MSDS/SDS, including updates, to the user department, the site technical data center, and the New Orleans Safety and Health department. Verify the chemical is on the approved products list, Qualified Products List (QPL), which is available on the ES&H website. Do not issue the product until officially approved. d. Upon receiving each shipment of hazardous chemicals, verify that a label is affixed to each container with information about its identity, hazard warnings, and the name and address of the manufacturer or responsible party. The shipment of hazardous chemicals shall not occur unless a proper label is affixed to each container. Provide updated labeling information to the user department when received. e. Inventory of all hazardous chemicals held in storage within the Property department according to ASI 5400.15 (Environmental Instruction Manual).

TABLE 23.1. HAZARD COMMUNICATION PROGRAM RESPONSIBILITIES

Position or Department	Responsibility
	<ul style="list-style-type: none"> f. Develop an MSDS/SDS work station handbook for Property that has the current Chemical Inventory Form, and the corresponding current MSDS/SDSs placed in the handbook in a retrievable manner. Quarterly, remove from the handbook MSDS/SDSs for hazardous chemicals that are no longer in the current chemical inventory. Employees must be aware that this section of the APM is in Sharepoint/Technical Data Library and will be made available upon request. g. Provide hazard communication information/training to Property employees prior to assigning them tasks involving hazardous chemicals. h. Review the MSDS/SDS for any hazardous chemical received at the monthly supervisor's safety meeting. i. Ensure MSDS/SDSs for chemicals no longer on site are sent to RIDS.
Operations	<ul style="list-style-type: none"> a. Inventory all hazardous chemicals issued to or stored within the Operations department according to ASI 5400.15, Environmental Instruction Manual. b. Develop an MSDS/SDS work station handbook for Operations that has the current Chemical Inventory Form, and the corresponding current MSDS/SDS s placed in the handbook in a retrievable manner. Quarterly, remove from the handbook MSDS/SDS s for hazardous chemicals that are no longer in the current chemical inventory. Employees must be aware that this section is in Sharepoint/Technical Data Library and will be made available upon request. c. Provide ready access to the MSDS/SDS Work Station Handbook for all Operations employees during all shifts. d. Provide new or transfer employees with hazard communication information/training prior to assignment to tasks involving hazardous chemicals until formal training is provided. e. Ensure that Operations employees attend formal hazard communication training, follow safe work practices, use the proper personal protective equipment during operations involving hazardous chemicals, and are aware of the procedures to follow in case of an emergency involving hazardous chemicals. f. Verify that the labels on all containers of hazardous chemicals are legible and prominently displayed. g. Ensure that MSDS/SDSs for chemicals no longer on site are sent to RIDS. h. Ensure that before starting the work, all Operations subcontractors are provided with a safety orientation on the hazards to which their employees may be exposed at the site, the M&O contractor labeling system, and the location where MSDS/SDSs for hazardous chemicals used by the M&O contractor are available. i. Review the MSDS/SDS for any new hazardous chemicals received at the monthly supervisor's safety meeting.
Maintenance	<ul style="list-style-type: none"> a. Inventory all hazardous chemicals issued to or stored in Maintenance according to ASI 5400.15, Environmental Instruction Manual.

TABLE 23.1. HAZARD COMMUNICATION PROGRAM RESPONSIBILITIES

Position or Department	Responsibility
	<ul style="list-style-type: none"> b. Develop an MSDS/SDS work station for Maintenance that has the current Chemical Inventory Form and the corresponding current MSDS/SDS s placed in a handbook in a retrievable manner. Quarterly, remove from the handbook MSDS/SDSs for hazardous chemicals that are no longer in the current chemical inventory. Employees must be aware that this section of the APM is in Sharepoint/Technical Data Library and will be made available upon request. c. Provide ready access to the MSDS/SDS Handbook for all Maintenance employees during all shifts. d. Provide new or transfer employees with hazard communication information training prior to assigning tasks involving hazardous chemicals until formal training has been provided. e. Ensure that Maintenance employees attend formal hazard communication training, follow safe work practices, use the proper personal protective equipment during operations involving hazardous chemicals, and are aware of the procedures to follow in case of an emergency involving hazardous chemicals. f. Verify that the labels on all containers of hazardous chemicals used for maintenance are legible and prominently displayed. g. Ensure that all Maintenance subcontractors, before starting work, are provided with a safety orientation on the hazards to which their employees may be exposed at the site, the M&O contractor labeling system, and the location where MSDS/SDSs for hazardous chemicals used are available. h. Review the MSDS/SDS for any new hazardous chemicals received at the supervisor's monthly safety meeting. i. Ensure that MSDS/SDSs for chemicals no longer on site are sent to RIDS.
DM Subcontract Manager's Technical Representatives	<ul style="list-style-type: none"> a. Ensure that all DM subcontractors are provided with a safety orientation on the hazards to which their employees may be exposed at the site, the DM labeling system, and the location where MSDS/SDSs for hazardous chemicals used by DM are available before starting the work. b. Ensure that the contract submittal described in the subcontract is obtained for all subcontractors. c. Ensure that subcontractors furnish a Chemical Inventory and that corresponding MSDS/SDS s for all chemicals to be used are maintained in an MSDS/SDS handbook and updated as changes in chemicals and contracts require. This book shall be readily accessible and centrally located for Emergency Response Team (ERT) responses. d. Ensure that contractor chemical inventory data is submitted to the site inventory focal point using the SPR computerized chemical automated inventory database. e. Ensure that all subcontractors submit a list of chemicals to be used on site to DM Environmental to verify listing on the QPL or to authorize

TABLE 23.1. HAZARD COMMUNICATION PROGRAM RESPONSIBILITIES

Position or Department	Responsibility
Site Laboratories/Site ES&H	<p>use on the SPR.</p> <ul style="list-style-type: none"> a. Inventory all hazardous chemicals stored within the lab according to ASI 5400.15, Environmental Instruction Manual. b. Develop an MSDS/SDS work station handbook for the laboratory that has the current Chemical Inventory Form, and that the corresponding current MSDS/SDSs are placed in the handbook in a retrievable manner. Quarterly, remove MSDS/SDSs for hazardous chemicals that are no longer in the current chemical inventory from the handbook. Employees working in the laboratory must be aware that this section of the APM is in Sharepoint/Technical Data Library and will be made available upon request. c. Verify that the labels on all containers of hazardous chemicals within the lab are legible and prominently displayed. d. Provide new or transfer employees with hazard communication information/training prior to assignment to tasks involving hazardous chemicals until formal training is provided. e. Ensure that personnel attend formal hazard communication training. f. Review at the monthly supervisor's safety meeting the MSDS/SDS for any new hazardous chemical received. g. Ensure that MSDS/SDSs for chemicals no longer on site are sent to RIDS.
Graphics Department	<ul style="list-style-type: none"> a. Inventory all hazardous chemicals stored in the Graphics department according to ASI 5400.15, Environmental Instruction Manual. b. Develop an MSDS/SDS work station for Graphics that has the current Chemical Inventory Form and the corresponding current MSDS/SDS s placed in a handbook in a retrievable manner. Quarterly, remove MSDS/SDSs for hazardous chemicals that are no longer in the current chemical inventory from the handbook. Employees must be aware that this section of the APM is in Sharepoint/Technical Data Library and will be made available upon request. c. Verify that the labels on the containers of hazardous chemicals within Graphics department are legible and prominently displayed. d. Provide new or transfer employees with hazard communication information/training prior to assignment to tasks involving hazardous chemicals until formal training is provided. e. Ensure Graphics personnel attend formal hazard communication training. f. Review at the quarterly supervisor's safety meeting the MSDS/SDS for any new hazardous chemicals received. g. Ensure that MSDS/SDSs for chemicals no longer site are sent to RIDS.
All Departments (Note Contractual Information.)	<ul style="list-style-type: none"> a. Ensure that all DM subcontracts include the following information: <ul style="list-style-type: none"> 1. This subcontract is subject to the provisions of 29CFR1910.1200 and/or 29CFR1926.59, as applicable. Compliance with these requirements is mandatory and any lower-tier subcontracts shall also include the requirement for compliance to these regulations. 2. Each subcontractor is required to provide an inventory and the

TABLE 23.1. HAZARD COMMUNICATION PROGRAM RESPONSIBILITIES

Position or Department	Responsibility
	<p>corresponding MSDS/SDSs of all hazardous chemicals that are used or stored on SPR property to the SMTR. No hazardous chemical is allowed on site unless it has been previously approved in writing by DM. The SMTR is responsible for maintaining the MSDS/SDSs in a handbook accessible in a central location for ERT response.</p> <ol style="list-style-type: none"> 3. Each subcontractor must ensure that any lower-tier subcontracts entered into also include this requirement. The initial inventory and corresponding MSDS/SDSs shall be submitted before the materials are brought on site. An update is submitted by the 15th of each month. b. Ensure that all purchase requests and petty cash or credit card purchases for hazardous chemicals include a requirement that the chemical manufacturer, distributor, or importer provide the following items: <ol style="list-style-type: none"> 1. An MSDS/SDS for the hazardous chemical. 2. A label affixed to each hazardous chemical container with information about the identity of the hazardous chemicals, the appropriate hazard warnings, and the name and address of the chemical manufacturer, importer, or other responsible party.
New Orleans Safety and Health	<ol style="list-style-type: none"> a. Maintain a hazard communication training package that meets the requirements of 29CFR1910.1200. b. Review departmental MSDS/SDS handbooks and DM and subcontractor work and storage areas to ensure compliance with the requirements of 29CFR1910.1200 and 29CFR1926.54 during annual Organizational Audits. c. Review subcontracts and purchase requests to ensure items listed in this table under Site Laboratories/Site ES&H, a and b, are included. d. Conduct employee exposure monitoring to quantify employee exposures to carcinogens and other hazardous chemicals. e. Review new chemicals that are not on the Qualified Product List to ensure that products do not contain unacceptable hazardous ingredients. f. Review the hazard communication training package, <u>when determined by the SME</u>, to ensure it is up to date with requirements of 29CFR1910.1200.
Site Safety Specialist	<ol style="list-style-type: none"> a. Provide hazard communication training to personnel. b. Perform and document random audits of departmental MSDS/SDS Handbooks and subcontractor work and storage areas to ensure compliance with the requirements of 29CFR1910.1200 and 29CFR1926.54. Random audits will also include all subcontractors.
Employees	<ol style="list-style-type: none"> a. Use hazardous chemicals only as according to the precautions listed on the MSDS/SDS and as instructed by site supervision and New Orleans Safety & Health. b. Review the hazard communication program and applicable MSDS/SDSs in the MSDS/SDS Handbook before using non-routine hazardous chemicals.

TABLE 23.1. HAZARD COMMUNICATION PROGRAM RESPONSIBILITIES

Position or Department	Responsibility
	c. Request any additional information or training needed on a hazardous chemical from your supervisor or safety administrator. d. Inform the supervisor when a new chemical or hazard is introduced to the job site. e. Read and comply with the provisions of the DM Hazard Communication Program. f. Label any unmarked container with its contents and associated hazards when transferring from a labeled to unlabeled container if it will be used by another employee or during another shift. g. Before procuring chemicals for site use, ensure that the specific chemical is on the QPL or contact DM Environmental for approval to use.
Site Director	a. Ensure that there is a master MSDS/SDS file for all chemicals on site for emergency use.
Site Cavern Engineer	a. Provide a safety orientation on the hazards workers may be exposed to before starting the work. Include information on the DM labeling system and the location where MSDS/SDSs for hazardous chemicals are available. b. Ensure that the contract submittal described in this table under Site Laboratories/Site ES&H, point a., is obtained for all subcontractors. c. Ensure that subcontractors furnish a Chemical Inventory and corresponding MSDS/SDSs for all chemicals to be used. These shall be maintained in an MSDS/SDS handbook and updated as changes in chemicals and contracts require. This book shall be readily accessible and centrally located for Emergency Response Team (ERT) responses. d. Ensure that contractor chemical inventory data is submitted to the site inventory focal point using the SPR Computerized Chemical Inventory Database.
Contractor/Subcontractor	a. Provide an MSDS/SDS for any chemical that will be used in the course of work that is not on the QPL to DM Environmental and Safety & Health for review and approval. Do not bring any chemical on a SPR site that is not on the QPL. b. Have MSDS/SDSs in the workplace for all chemicals being used on the job. c. Have an approved Hazard Communication Program. d. Ensure that all chemicals being used are approved for use and properly labeled.