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BRYANT GROUP, INC. HAZARD COMMUNICATION SDS PROGRAM

COMPANY: Bryant GROUP, INC.
LOCATION: 7891 Beechcraft Ave, Gaithersburg, MD 20879

Hazard Communication Program Coordinator Manager: Firstline Safety Management 540-723-6412
Gus Jaramillo 240-353-5680

The following responsibilities include coordinating chemical lists, hazard evaluations, and SDS acquisition, organizing training, and administering the program.

This program is effective as of August 5th, 2009.

Key Areas or **Key Groups** have been designated and are listed in **Appendix A**.

Chemical Lists: A chemical list has been compiled for all materials present in each Key Area for all materials. Chemical lists will be updated whenever there is a change in the process or supplier.

Gus Jaramillo is responsible for making chemical lists and keeping them updated for each Key Area/Group. Copies of the chemical lists are attached as **Appendix B**. Chemical lists will be updated annually or sooner if and as conditions warrant.


Employees will not be allowed to bring chemicals, including consumer products, into the facility. All requests for chemical purchases must go through the purchasing process. John Challenger is responsible for enforcing this.

Hazard Evaluations: A hazard determination for each Key Area/Group has been done for each chemical to which employees are potentially exposed. This evaluation includes identification of processes/jobs where the chemicals are used or can occur, as well as what concentrations are involved. Production Managers will be responsible for performing Hazard Evaluations for each Key Area/Group. These evaluations will be reviewed by the Senior Management Team.

All chemicals in use or stored in the work areas have been listed. An evaluation of whether these chemicals posed a health and/or physical hazard was done by determining if:

- They were exempted by the standard.
- Assigned an ACGIH TLV (which would include chemicals with OSHA PEL's).
- Listed in the RTECS as a carcinogen or having significant hazards.
- Described on an SDS or label as presenting a physical or human health hazard.
- They were on an OSHA list (*in some states*).

Chemicals which were determined not to present a hazard were indicated with N/A in the "Hazard" column of the Hazard Evaluation form and/or N/A in the "SDS" column. Protective measures, warning signs and air sampling data, if available, have also been accumulated for each of these substances. Copies of Hazard Evaluations are attached as **Appendix F**.

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Any additional chemicals present in the work areas as a result of operations have also been documented through these hazard evaluations and are indicated as **Chemicals in the Work Area (Other than Raw Materials)** on an attached form as **Appendix C**.

Non-routine Hazards and Emergencies: Non-routine jobs/situations and types of emergencies where exposure to hazardous chemicals might occur have been identified for each Key Area/Group during the Hazard Evaluation surveys and are also listed in Appendix F. Where these jobs require different chemicals, employees, work areas, work times, than those normally used in the workplace, a separate Chemical List (Appendix B) and Hazard Evaluation (Appendix C) forms have been filled out. Key Area/Group designation have been identified.

Written guidelines describing special procedures and emergency plans for these situations have been developed by N/A. **Appendix D**.

Pipelines containing hazardous chemicals or covered with asbestos insulation have been identified and the following action(s) has been taken N/A Bryant Group Inc works in new home construction only, no large containers of chemicals are ever present on the jobsite.

Safety Data Sheets (SDS): SDS's have been requested for all chemicals purchased by BGI by John Challenger, Purchasing Manager.

All chemical purchases will initially require an SDS unless they are included in the exceptions to the Hazard Communication Standard. These exceptions are:


- Hazardous waste.
- Tobacco or tobacco products.
- Wood or wood products.
- Articles, foods, drugs, or cosmetics intended for personal consumption by employees while in the workplace.
- Consumer products packaged for distribution to, and use by, the general public (*in some states*).

All SDS's will be sent to the Hazard Communication Program Coordinator and will be reviewed when received by Gus Jaramillo to determine whether SDS's are adequate using the **Bryant Group Inc SDS Guidelines**. If inadequate, vendors will be contacted and requested to improve the SDS's. This will be the responsibility of Gus Jaramillo. If SDS's are not available, and a substitute chemical cannot be obtained, equivalent information will be assembled by 'Chemical will not be used' using the **Bryant Group Inc SDS Guidelines** and reference materials mentioned in the Hazard Communication Standard.

Gus Jaramillo is responsible for providing copies of SDS and other chemical safety data to employees upon request. Employees have been informed of this during training.

Labeling: A labeling system has been developed by each Bryant Group Inc location to make sure that both manufacturers' containers and in-house containers are appropriately labeled. The BGI Location Labeling System consists of the following:

- All containers of raw materials furnished by vendors are inspected to determine if they contain the manufacturer's name and address, chemical (or trade) name and a hazard warning.

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- The chemical name on the container is cross-checked with the identity on the SDS to assure they are the same.
- Manufacturers of containers with inadequate labels are contacted and requested to update them.
- Other in-house containers of chemicals, which are used by more than one employee and last for more than one work shift, have been labeled with the chemical name and a hazard warning.

John Challenger is responsible and contacting vendors whose containers have inadequate labels. Labels for in-house containers will be obtained from the manufacturer. Employees will not be allowed to use unlabeled containers. Management will be responsible for enforcing this.

Site Employers: Bryant Group provides an SDS chemical list in binder form to all of our Contractors as well as an App on the BGI vehicles that gives BGI's SDS information from the BGI website. This way the employees in the field will be informed of the chemicals that are used in the field by BGI employees.

Subcontractors: Production Managers and the Senior Management Team will assure that subcontractors are informed of any potential chemical hazards in areas where they work prior to beginning the work. This will be done by providing them with an SDS book covering the chemicals used by Bryant Group Inc.

Employee Training: All Bryant Group Inc employees will be provided with Hazard Communication training during their safety orientation. The required training areas of the Hazard Communication Standard will be covered and documented as per BGI's general training guidelines.

An opportunity for employees to discuss written and audiovisual information and ask questions will be provided during the training presentation. New employees will be trained within thirty (30) days of starting their employment with BGI.


Program Organization: Program effectiveness will be evaluated through regular inspections of each Key Area. Firstline Safety Management will be responsible for evaluations.

Binders containing a copy of the Bryant Group Inc Written Program, Chemical Lists and SDS's have been put in specific locations for each Key Area/Group. A supervisor or other person has been designated for each of these to be responsible for furnishing copies of SDS to employees upon request, keeping Key Area/Group binders updated, and updating employee training as new chemicals come into use. These locations are included in **Appendix A**, the list of Key Areas/Groups.

A complete binder of all SDS Hazard Communication materials will be kept in all BGI vehicles, the office and in the Warehouse of each BGI location. The Safety Coordinator Manager is responsible for maintaining these files.

The records include:

- Written Hazard Communication Program.
- The Chemical Lists, Hazard Evaluation forms and other Appendices.
- Copies of SDS's for each Key Area/Group.
Training outlines.
- Signed pages from the "Hazard Communication – A Review of the Standard" handout.

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State Standards “Right to Know”: OSHA gives workers and their representatives the right to see information that employers collect on hazards in the workplace. Workers have the right to know what hazards are present in the workplace and how to protect themselves.

Many OSHA standards require various methods that employers must use to inform their employees, such as warning signs, color-coding, signals, and training. Workers must receive their normal rate of pay to attend training that is required by OSHA standards and rules. The training must be in a language and vocabulary that workers can understand.

Right to Know about Chemical Hazards

The Hazard Communication standard, known as the “right-to-know” standard, requires employers to inform and train workers about hazardous chemicals and substances in the workplace.

Employers must provide workers with effective information and training on hazardous chemicals in their work area. This training must be in a language and vocabulary that workers can understand.



Appendix A

Hazard Communication Program

Key Areas/Groups

KEY AREAS/GROUPS	BINDER LOCATION	SUPERVISOR
All Productions Managers, the Safety Coordinator, Firstline Safety Management & the field employees.	Company vehicles. Company warehouse locations.	BGI Production Managers & Superintendents.



Appendix B

Hazard Communication Program



Chemical List and Labeling Inventory for Raw Materials

KEY AREA/GROUP: _____ N/A _____ REGION: _____ N/A _____

DATE: _____ LOCATION: _____

SDS (√)	CHEMICAL NAME	MANUFACTURER	TYPE, SIZE, NUMBER OF CONTAINERS	Verify Labels includes:		
				Chemical Name (√)	Chemical Mfr. Name & Address (√)	Hazard Warning (√)
	NO RAW CHEMICALS ARE USED ON JOB SITES					

Chemical Labeling Inventory Done By: Safety Coordinator Manager



Appendix C

Hazard Communication Program

Chemicals in the Work Area (Other than Raw Materials)

KEY AREAS/GROUPS	CHEMICAL NAME	SOURCE/OPERATION	SUBSTITUTE CHEMICAL DATA OR SOURCE OF SDS	RTECS (√)
JOBSITES	GLUE, PRIMER GASOLINE OIL SAKCRETE MIX	INSTALLATION OF PVC PIPE, CPVC WATER PIPING, GENERATORS, BEDDING FOR LARGE TUBS	SDS BINDER IN VEHICLE	



Appendix D

Hazard Communication Program

N/

Non-Routine Hazards and Emergencies

KEY AREAS/GROUPS AFFECTED	NON-ROUTINE HAZARD / TYPE OF EMERGENCY	CHEMICAL HAZARD	WRITTEN PROCEDURES/ EMERGENCY PLAN ATTACHED (✓)
N/A	N/A	N/A	N/A



Appendix E

Hazard Communication Program

State Regulations

STATE REQUIRMENT	ACTION TAKEN FOR BGI PROGRAM	DOCUMENTATION ATTACHED (√)
<p>COPY OF SDS TABLE OF CONTENTS SENT TO: MARYLAND DEPT. OF ENVIRONMENT, TECHNICAL AND REGULATROY SERVICES ADMINSTRATION COMMUNITY RIGHT TO KNOW PROGRAM 1800 WASHINGTON BLVD, SUITE 540 BALTIMORE, MD 21230 ATTN: MR A BALRAM</p>		



Appendix F

Hazard Communication Program

The Hazard Evaluation Survey

FILL OUT A FORM FOR EACH KEY AREA/GROUP

CHEMICAL NAME – Enter either the name from the container or the abbreviation used by the employees. Make sure there is a way of identifying this chemical with the one on the chemical list and the SDS.

SOURCE/OPERATION*-- Choose the option which best explains what task this chemical is associated with. List all uses/operations/jobs for a given Key Area/Group. Put an asterisk (*) next to the listing if it is associated with a nonroutine hazard such as cleaning out the glue tank or bag house, spill cleanup, or repair of hydraulic lines.

HOW HANDLED OR POTENTIALLY OCCURRING** -- This will include physical manipulations such as “poured from bag” or sprayed, as well as by-products of the process (e.g., formaldehyde released from a plywood press), and related operations (e.g., carbon monoxide released from forklifts). Also include any chemical changes, which occur (e.g., melting solder results in a lead fume). Emergency situations such as chlorine tank leaks gets double asterisks (**) and often require written procedures.

CONCENTRATION USED – Designate whether dilute or concentrated. Try to include exact percentages and what the compound is diluted with.

HOW DETECTED – Describe any warning signs associated with the chemicals. These include a description of the odor (and odor threshold if known), irritating properties, physical form (solid, liquid, gas) and color. If odorless or colorless, indicate as such. For information on odor thresholds and descriptions, see the **Hazard Evaluation Section** in the *RSG Hazardous Materials Handbook*.

AIR SAMPLING RESULTS – If the chemical is not likely to become airborne, of low volatility such as oils or in a closed system, so indicate. If air sampling has been done, put the range of levels, which were measured at that job. Indicate the TLV (or PEL) if it exists for the chemical. If a mixture, select the most hazardous or predominant compound and indicate its TLV or list components with their separate TLVs. If none exist, indicate “N/A.” For a list of chemicals and their TLV’s, see the **Hazard Evaluation Section** of the *RSG Hazardous Materials Handbook*.

PROTECTIVE MEASURES – List controls in effect at that job or operation. These might include personal protective equipment, local exhaust, closed systems, written procedures and/or automatic monitoring alarms. Also indicate what precautions have been taken (e.g., special storage containers or other special handling), if the chemical is flammable, reactive or explosive.

SDS – When SDS’s are received, make a check in the column. If the material is exempted, put “N/A.” If chemical data is used in lieu of an SDS (e.g., acetone, formaldehyde, chlorine, caustic), indicate “CD.”

HAZARD: HEALTH, PHYSICAL – Using SDS’s and other sources of chemical data, determine if the material poses a health (H) and/or physical (P) hazard and insert an H and/or a P to indicate. See the sheet on **Sources of Chemical Information** for a list of chemical references.



Where Quality and The Environment Comes Together

Appendix F
Hazard Communication Program

KEY

AREA/GROUP _____ REGION _____

Hazard Evaluation

DATE: _____

LOCATION: _____

SDS (√)	HAZARD: HEALTH (H) PHYSICAL (P)	CHEMICAL NAME	SOURCE/ OPERATION*	HOW HANDLED OR POTENTIALLY OCCURRING **	CONCENTRATION USED	HOW DETECTED



*INDICATES NONROUTINE USE/HAZARD

**INDICATES EMERGENCY SITUATION

By: _____

Hazard Evaluation Done