

	Health, Safety & Environmental Hazard Communication			Page 1 of 5
	Approved By M. Miller	Issue Date 09/01/2019	Revision Date	Revision Number 0

1 Purpose

To fully inform employees of any hazardous chemicals used in their workplace and to comply with OSHA 29 CFR 1910.1200, Hazard Communication, Silver Eagle Distributors Houston, LLC (Silver Eagle Houston) has established the following written Hazard Communication (HazCom) standard. The standard will be implemented and maintained at all company workplaces. The written standard is available for employee review at any time by contacting the HSE Department. The HSE Department is responsible for the implementation and ongoing compliance with the standard.

2 Standard Objectives

- Establish a written hazard communication standard in accordance with 29 CFR 1926.1200.
- Inventory any hazardous chemicals used at Silver Eagle Houston facilities.
- Obtain Safety Data Sheets (SDS) on all chemicals purchased or used in the workplace.
- Development of SDS on in-house chemical mixtures.
- Provide specific information to employees including making SDS available.
- Ensure all containers are labeled.
- Train all employees.

3 Hazard Communications Requirements

3.1 The HSE Department is responsible for ensuring that:

- A complete list of all chemicals used in Silver Eagle Houston's workplaces is available
- SDS are accessible for each chemical used and updated when new chemicals are added.
- SDS are available for review to all employees their designated representatives, and OSHA representatives.
- Manufacturers and suppliers provide SDS that contain mandatory and suggested information as required by regulation (Appendix D to 29 CFR 1910.1200):
 - **Section 1—Identification:** Product identifier, manufacturer or distributor name, address, phone number, emergency phone number, recommended use, and restrictions on use.
 - **Section 2—Hazard(s) identification:** All hazards regarding the chemical and required label elements.
 - **Section 3—Composition/Information on ingredients:** Information on chemical ingredients and trade secret claims.
 - **Section 4—First-aid measures:** Required first aid treatment for exposure to a chemical and the symptoms (immediate or delayed) of exposure.
 - **Section 5—Fire-fighting measures:** The techniques and equipment recommended for extinguishing a fire involving the chemical and hazards that may be created during combustion.

	Health, Safety & Environmental Hazard Communication			Page 2 of 5
Approved By M. Miller	Issue Date 09/01/2019	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-024

- **Section 6—Accidental release measures:** Steps to take in the event of a spill or release involving the chemical. Includes: emergency procedures, protective equipment and proper methods of containment and cleanup.
 - **Section 7—Handling and storage:** Precautions for safe handling and storage, including incompatibilities.
 - **Section 8—Exposure controls/Personal protection:** OSHA’s permissible exposure limits (PELs), threshold limit values (TLVs), appropriate engineering controls, and personal protective equipment (PPE).
 - **Section 9—Physical and chemical properties:** The chemical’s characteristics.
 - **Section 10—Stability and reactivity:** Chemical stability and possible hazardous reactions.
 - **Section 11—Toxicological information:** Routes of exposure (inhalation, ingestion, or absorption contact), symptoms, acute and chronic effects, and numerical measures of toxicity.
 - **Section 12—Ecological information:** How the chemical might affect the environment and the duration of the effect. (Suggested)
 - **Section 13—Disposal considerations**—describes safe handling of wastes and methods of disposal, including the disposal of any contaminated packaging. (Suggested)
 - **Section 14—Transportation information**—includes packing, marking, and labeling requirements for hazardous chemical shipments. (Suggested)
 - **Section 15—Regulatory information**—indicates regulations that apply to chemical. (Suggested)
 - **Section 16—Other information**—includes date of preparation or last revision.
- 3.2 Under the HSE Department’s management, Silver Eagle Houston will follow these steps when receiving hazardous chemicals:
- 3.2.1 Containers received and used must include the safety data sheets and labels with:
- Appropriate hazard warnings.
 - Name and address of the manufacturer.
- 3.2.2 The HSE Department is notified whenever a new chemical is introduced into the company.
- 3.2.3 No containers will be released for use until the above data is verified.
- 3.2.4 Containers into which hazardous chemicals are transferred will be properly labeled, tagged, or marked with the chemical identity/ hazardous warning unless the container is for immediate use.

		Health, Safety & Environmental Hazard Communication		Page 3 of 5
Approved By M. Miller	Issue Date 09/01/2019	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-024

3.3 Chemical Inventory and Safety Data Sheets

OSHA requires that suppliers and/or manufacturers of any hazardous substances will evaluate any hazardous chemicals used by the company and will determine necessary hazard information. That information is provided to the company through Safety Data Sheets (SDS) and standardized labels.

Silver Eagle Houston will maintain an inventory of all hazardous chemicals to which employees may be exposed and ensure that it has SDS that match each of the hazardous chemicals. SDS for each hazardous chemical used in a workplace will be fully and immediately accessible via Silver Eagle Houston's SDS management service, MSDSONline.

3.4 Container Labeling










No container or hazardous substances will be released for use unless the container is correctly labeled and the label is legible.

3.4.1 All chemicals in bags, drums, barrels, bottles, boxes, cans, cylinders, storage tanks, or the like will be checked to ensure the manufacturer's label is intact, is legible, and has not been damaged in any manner during shipment. Any containers found to have damaged labels will be quarantined until a new label has been installed.

3.4.2 Chemical manufacturers and importers must provide a label that includes a product identifier; signal word; hazard statement(s); pictogram(s); precautionary statement(s); and name, address, and telephone number of the chemical manufacturer, importer or other responsible party.

3.4.3 Labels must use OSHA-required Hazard Communications System Pictograms and Hazards:

HCS Pictograms and Hazards

Health Hazard  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	Flame  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	Exclamation Mark  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	Corrosion  <ul style="list-style-type: none"> ▪ Skin Corrosion/ Burns ▪ Eye Damage ▪ Corrosive to Metals 	Exploding Bomb  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
Flame Over Circle  <ul style="list-style-type: none"> ▪ Oxidizers 	Environment (Non-Mandatory)  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	Skull and Crossbones  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)

	Health, Safety & Environmental Hazard Communication			Page 4 of 5
	Approved By M. Miller	Issue Date 09/01/2019	Revision Date	Revision Number 0

3.4.4 If a chemical is transferred to a new container for use in the workplace, that secondary container must be labeled. The information must include details of all chemicals that are in the container.

4 Standard Review

Silver Eagle Houston will review and evaluate its Hazard Communication standard:

- On an annual basis.
- When changes occur to governing regulatory sources that require revision.
- When changes occur to related company procedures that require a revision.
- When facility operational changes occur that require a revision.
- When there is an incident or near miss that relates to this area of safety.
- Anytime the control measures in this standard fail.

5 Training

Silver Eagle Houston shall provide the following information and training to employees before working in areas where hazardous chemicals exist. The company will provide updated information to employees whenever a new hazardous chemical that may present a new physical or health hazard is introduced into the workplace.

5.1 Minimum Information Provided:

- All operations and locations in the work area where hazardous chemicals are present.
- The location and availability of the written Hazard Communication standard, including list(s) of hazardous chemicals used and related safety data sheets.
- The method the company will use to inform employees of potential hazards of non-routine tasks (jobs that are not routine for an individual because of infrequency, location or type.)
- Where employees must travel between workplaces during a work shift (multi job sites), the written standard may be kept at a primary job site. If there is no primary job site, then the standard should be sent with employees.

5.1.1 Informing Contractors

5.1.1.1 As necessary, the HSE Department or Department Manager will provide contractors with the following information:

- Details of the company Hazardous Communications standard, including location of SDS.
- Hazardous chemicals which may be present at the worksite.
- Measures the employees may take to lessen the possibility of exposure.
- Steps the company has taken to lessen the risks.
- Steps to follow if they are exposed.
- Location of spill kits and how to use them.

	Health, Safety & Environmental Hazard Communication			Page 5 of 5
	Approved By M. Miller	Issue Date 09/01/2019	Revision Date	Revision Number 0

- Emergency response requirements and telephone numbers.

5.1.1.2 Contractor Responsibilities

- Contractors entering a company workplace shall supply Silver Eagle Houston with SDS for any hazardous chemicals they may bring on site.
- Contractors shall limit quantities of hazardous chemicals brought into Silver Eagle Houston facilities to those necessary for daily consumption and any remaining hazardous chemicals shall be removed at the end of the workday. Deviation from this rule shall require permission from Silver Eagle Houston management.

5.2 Minimum Training Provided:

Training must be conducted at the time of hire, when a new chemical is introduced, when an employee changes duties that involve new chemicals and on an annual basis. All training must be documented and kept on file. Training topics shall include:

- An overview of the requirements contained in the Hazard Communication Standard, including:
 - Work practices, emergencies, and care, use, and maintenance of protective equipment.
 - How to read and understand safety data sheets and labeling.
- The physical and health hazards of chemicals in the assigned work area.
- Control/work practices and personal protective equipment, including the types of PPE, to be used for specific chemicals.
- Hazards related to nonroutine tasks, such as the cleaning of vessels or lines.
- Hazards associated with chemicals contained in unlabeled pipes in their work areas.

6 References

OSHA 29 CFR 1910.1200

7 Document Revision Register

Revision #	Section #	Date	Revision Description
0		09/01/2019	Initial Issue