

## WRITTEN HAZARD COMMUNICATION PROGRAM

The California Occupational Safety and Health Administration (Cal/OSHA) Hazard Communication Standard (HCS) calls for the development of a Hazard Communication Program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. Cal/OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The written Hazard Communication Program will include the required elements of the Globally Harmonized System (GHS).

To enhance our employees' health and safety, Ultimate Internet Access, Inc. has developed, implemented, and maintains a Hazard Communication Program that ensures effective communication about associated hazards of some of the substances in our workplace, and the control of these hazards through a comprehensive Hazard Communication Program that includes the elements listed below. The Hazard Communication manager, John Burke-Zuber, has full authority and responsibility for implementing and maintaining this program.

### LIST OF HAZARDOUS SUBSTANCES

John Burke-Zuber will prepare and keep current an inventory list of all known hazardous substances present in our workplace. Specific information on each noted hazardous substance can be obtained by reviewing the SDS (see Attachment, "Hazardous Substance Inventory List").

### PROPOSITION 65 LIST OF CHEMICALS

John Burke-Zuber is responsible for obtaining updates of Proposition 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Proposition 65 list, the necessary warning will take effect 12 months from the date of listing.

### SAFETY DATA SHEETS (SDS)

John Burke-Zuber is responsible for obtaining the SDS, reviewing them for completeness, and maintaining the data sheet system for our company. In the review of incoming data sheets, if new and significant health/safety information becomes available, this new information is passed on immediately to the affected employees by additional training sessions, posting of memos, and other means of communication.

Legible SDS copies for all hazardous substances to which employees of this company may be exposed are kept in \_\_\_\_\_.

(List each location)

SDS are readily available for review to all employees in their work area and during each work shift. If SDS are missing or new hazardous substance(s) in use do not have SDS, or if an SDS is obviously incomplete, please contact John Burke-Zuber immediately, and a new SDS will be requested from the manufacturer. If we are unable to obtain the SDS from the vendor within 25 calendar days of the request, we will either call our local Cal/OSHA compliance office or write to:

Division of Occupational Safety and Health  
Deputy Chief of Health and Engineering Services  
P. O. Box 420603  
San Francisco, CA 94142-0603

If anyone has a specific question or needs additional information on an SDS, please call John Burke-Zuber.

Electronic SDS: If we use alternatives to paper SDS, computer or microfiche machines with printers or fax machines we will make sure that employees have ready access to and know how to operate these devices for retrieval and printing of legible hard copies. Our backup system in the event of failure of the primary SDS retrieval system will be \_\_\_\_\_

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## LABELS AND OTHER FORMS OF WARNING

Before hazardous substance containers are released to the work area, it is the policy of our company that John Burke-Zuber will verify that all primary and secondary containers (Note: Supervisors will be the ones relied upon to ensure that the secondary containers are properly labeled).

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

Ultimate Internet Access, Inc. will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)

To address exposures to Proposition 65 chemicals, John Burke-Zuber will provide clear and reasonable warnings to individuals prior to exposure by means of posting signs conspicuously, labeling consumer products, and training employees.

If necessary, John Burke-Zuber will arrange for labels, signs, and other warnings to be printed in other languages.

## EMPLOYEE INFORMATION AND TRAINING

Employees are to attend a health and safety training session set up by John Burke-Zuber prior to starting work. This training session will provide information on the following:

- The requirements of the hazard communication regulation, including the employees' rights under the regulation
- The location and availability of the written Hazard Communication Program
- Any operation in their work area, including non-routine tasks, where hazardous substances or Proposition 65 carcinogens/reproductive toxins are present and exposures are likely to occur
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area

- Protective practices prescribed to minimize or prevent exposure to these substances
- How to read labels and review SDS to obtain hazard information
- Physical and health effects of the hazardous substances, particularly when it comes to use of grease and similar cleaners
- Symptoms of overexposure
- Measures employees need to put into practice to reduce or prevent exposure to these hazardous substances by engineering controls, work practices, and use of Personal Protective Equipment
- Emergency and First Aid procedures to follow if employees are exposed to hazardous substances, grease and similar cleaners in particular
- The location and interpretation, if needed, of warning signs or placards to communicate that a chemical known to cause cancer or reproductive toxicity is used in the workplace

Employees will receive additional training when a new hazard is introduced into the workplace or whenever employees might be exposed to hazards at another employer's work site.

## HAZARDOUS NON-ROUTINE TASKS

Periodically, our employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees will be given information by their supervisor on hazards to which they may be exposed during such an activity.

This information will cover:

- Specific hazards
- Measures taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program, and establishing emergency procedures
- Required protective/safety measures

Non-routine tasks performed/hazardous chemicals used by employees of this company are given below.

Non-routine Task	Hazardous Substance

## LABELED/UNLABELED PIPES (If applicable)

Above-ground pipes transporting hazardous substances (gases, vapors, liquids, semi-liquids, or plastics) shall be identified in accordance with T8 CCR, Section 3321, and "Identification of Piping".

Other above-ground pipes that do not contain hazardous substances but may have associated hazards if disturbed or cut (e.g., steam lines, oxygen lines) shall be addressed as follows:

Before employees enter the area and initiate work, John Burke-Zuber will inform them of:

- The location of the pipe or piping system or other known safety hazard
- The substance in the pipe
- Potential hazards
- Safety precautions



