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## Document: Hazard Communication

### I. PURPOSE

This policy establishes the requirements for Escanaba Mill and its employees for the Hazard Communication (Employee Right-to-Know) Program (MIOSHA Part 92). The goal of this policy is to provide all employees with necessary information such as labels, Safety Data Sheets (SDSs), and training that will aid in preventing illness and injury which might result from exposure to hazardous materials under normal conditions of use or in an emergency. Personal Protective Equipment that affords an appropriate level of protection from chemicals to which team members may be exposed will be provided.

### II. RESPONSIBILITY

It is the responsibility of the Safety Department to maintain the Hazard Communication Program that incorporates the following elements:

Inventory of Hazardous Materials	SDS Locations & Maintenance
Labeling	Training
Hazard Determination	Non-Routine Tasks
Provision for Contractors	

The written program shall be updated whenever changes are made and shall be reviewed at least annually.

### III. EXECUTION

#### A. Inventory of Hazardous Materials

The Safety Department is responsible for maintaining the inventory of hazardous materials. Hazardous materials known to be present include hazardous components of raw materials; materials produced in the process and finished products. This inventory is a part of the hazard communication program, and a copy of the current inventory shall remain with the hard copy of the SDSs at the Loss Prevention front gate.

#### B. SDS Locations & Maintenance

The most current SDSs for hazardous materials are available electronically on all Escanaba computers. To access, visit the Escanaba *Insight* page, then select the Sphera SDS Link.

Most systems have 24-hour availability for accessing the SDSs, and a hard copy at the front gate is also available 24-hours a day.

The Safety Department is responsible for maintaining and updating the SDS system. Receiving and Purchasing are responsible for forwarding the SDSs of hazardous materials to the Safety Department for review and input into the SDS books and inventory. No hazardous material shall be brought on-site until it has

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been approved through the Material Request and Approval Process (MRAP). Chemicals can be initiated into MRAP through the Purchasing Department.

SDSs for hazardous materials that are no longer present in the workplace shall be retained for at least thirty years after use of the hazardous material is discontinued. The inventories of hazardous materials shall also be retained in order to document when a hazardous material was used. When an SDS is superseded by a newer version, the previous SDS shall also be retained. The Safety Department will retain obsolete SDSs and inventories.

**C. Labeling**

Employees are prohibited from removing or defacing the labels on containers of hazardous materials as received until the container(s) are completely empty. For more details on empty containers refer contact the Safety Department.

1. Labeling will comply with the OSHA Hazard Communication requirements including mandatory revisions associated with those sections of the Globally Harmonized System recently adopted by OSHA. All labels on mill sites will be maintained in a readable condition. These labels must contain the product identifier, signal word, hazard statements, and precautions.
2. Hazard Warnings - An appropriate hazard warning shall include both a statement of potential health and physical hazards present and a statement of the target organ(s) potentially affected. An appropriate hazard warning shall appear on the label. Also, the material identity on the label shall be the same as the material identity provided on the SDS.
3. Primary Containers - All containers of hazardous materials shall be properly labeled with the material identity, and an appropriate hazard warning. Shipments of raw materials must not be accepted unless the proper label is present. For materials which are received in multiple unit packages, i.e., pallets, an appropriate label shall appear on each individual unit before it is released into the workplace. This label may be placed by the manufacturer or by Escanaba employees.
4. Secondary Containers - Secondary containers with chemicals that are not intended for immediate usage by the employee who performed the transfer must be properly labeled. Hazardous materials which are transferred from one container to another must also be labeled with the material identity, and the appropriate hazard warning on the new container.
5. Vessels - Tanks, silos, and other permanently fixed vessels storing hazardous materials must be labeled with the mills standard NFPA labeling which includes product name, hazards, confined space warning and emergency phone number. If the area requires signage, contact the Safety Department.



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6. Pipes - Pipes, which contain a hazardous material, will be labeled with the material identity, as a minimum. Contact the Safety Department for more information.

### D. Training

#### 1. Content of Training

All employees shall receive training prior to assignment in an area where there is a potential for exposure to a hazardous material. The specific elements to be covered in hazard communication training include:

- a. The requirements of the MIOSHA/OSHA Standards
- b. The availability of Escanaba's written program
- c. Access to the inventory of hazardous materials
- d. Access to Safety Data Sheets, including electronic version(s)
- e. An explanation of the information in an SDS
- f. An explanation of the labeling system
- g. Specific information regarding the health hazards and physical hazards of the hazardous materials to which the employee may be exposed
- h. Signs and symptoms of exposure to these hazardous materials
- i. Specific work practices and procedures to follow for personal protection

#### 2. New Hires/Transfers

For new hires/transfers, training in all the above elements must be completed, but as part of new employee orientation, this will not be completed by the Safety Department. It is the responsibility of the Area to cover parts (g.), (h.) and (i.) listed above before the employee may come in contact with any hazardous materials.

#### 3. All Employees

For all employees training in the above listed elements must be completed at least every two years. Whenever a new hazard is introduced into the workplace, training on the specific physical or health hazards, signs and symptoms of exposure, and the specific work practices and procedures to follow for personal protection must be provided to all potentially exposed employees.

#### 4. Documentation

Documentation of training shall include the following information:

- a. Name of each employee
- b. Date of training
- d. Instructor's name
- e. An outline of topics discussed

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### E. Hazard Determination

1. Purchased Hazardous Materials  
Escanaba's Hazard Communication Program shall rely on the hazard determinations, labels, and SDSs provided by the manufacturers of hazardous materials.
2. By-Products Produced On-Site  
Escanaba will perform the hazard determination and develop the appropriate labels and SDSs as necessary.

### F. Non-routine Tasks

Employee training in the hazards of materials to which they are potentially exposed shall focus on those materials which the employee uses in normal work situations. However, when a non-routine task presents the potential for an employee to be exposed to a different hazardous material exhibiting different hazardous properties, additional training dealing with the specific hazards of this material shall be provided before the non-routine task begins.

Non-routine tasks may include activities such as maintenance, cleaning, or using a trial ingredient in an existing process.

As part of the training program, employees should understand the need to avoid using hazardous materials if they are not familiar with the physical or health hazards of the material or if they have not received training in understanding the label or the SDS for the material.

### G. Provisions for Contractors

Contractors will have access to our written program, inventories, SDSs and all labels. Contractors must have Hazard Communication training before coming on to Escanaba property. Each hiring area is responsible for communicating the following to all its Contractors:

1. Providing Contractors access to the written program, SDSs, the inventory of hazardous materials to which the contractors may be exposed, and a description of the labeling system.
2. Informing the contractor of restricted work areas and emergency plans including alarms, evacuation routes, and assembly points in the work areas where the contractor employees may visit.
3. Request and receive from the Contractor the SDSs and the inventory of hazardous materials which the Contractor may bring into the workplace, and a description of the labeling system used by the Contractor.

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### Appendix A

#### Hazard Communication Standard Labels

As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown below. Supplemental information may also be provided on the label as needed.



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**SAMPLE LABEL**

**PRODUCT IDENTIFIER**

**CODE**

**Product Name**

**SUPPLIER IDENTIFICATION**

**Company Name**

Street Address

City State

Postal Code Country

Emergency Phone Number

**PRECAUTIONARY STATEMENTS**

Keep container tightly closed. Store in cool, well ventilated place that is locked.

Keep away from heat/sparks/open flame. No smoking.

Only use non-sparking tools.

Use explosion-proof electrical equipment.

Take precautionary measure against static discharge.

Ground and bond container and receiving equipment.

Do not breathe vapors.

Wear Protective gloves.

Do not eat, drink or smoke when using this product.

Wash hands thoroughly after handling.

Dispose of in accordance with local, regional, national, international regulations as specified.

**In Case of Fire:** use dry chemical (BC) or Carbon dioxide (CO<sub>2</sub>) fire extinguisher to extinguish.

**First Aid**

If exposed call Poison Center.

If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

**HAZARD PICTOGRAMS**

**SIGNAL WORD**

**Danger**

**HAZARD STATEMENT**

**Highly flammable liquid and vapor.**

**May cause liver and kidney damage.**

**SUPPLEMENTAL INFORMATION**

**Directions for use**

Fill weight: Lot Number

Gross weight: Fill Date:



Expiration Date:

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### HCS Pictograms and Hazards

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

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