

HAZARD COMMUNICATION PROGRAM

July 2024

This program applies to all work operations in E Light, where you may be exposed to a hazardous substance under normal occupational conditions, or during emergency situations.

The program will be available at each job site and a master file will be kept in the main office. Each Superintendent is acting as the representative of E Light and has the overall responsibility for maintaining and updating the program as necessary. Any employee can obtain a copy of the Hazard Communications Program or any part of it from site Superintendent during normal working hours.

This program is written with the intention of compliance with OSHA, 29 CFR 1910.1200(g) and Appendix D. United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

All employees are required to complete Hazard Communications Program 2016 training annually. The program will be made available by online access.

HAZARD DETERMINATION

It will be the policy of E-Light not to evaluate hazardous chemicals purchased from suppliers or manufacturers. The suppliers and manufacturers will be relied upon to supply the information needed to satisfy standard requirements. The SDS will be reviewed for completeness and additional information from the manufacturer will be requested if needed.

SDS (Safety Data Sheets)

The Superintendent of each site is responsible for obtaining necessary SDS's for hazardous materials, so a comprehensive SDS file can be maintained. The SDS shall include only those items on site at the project and shall be verified by comparison to the chemical and item inventory once per month to ensure accuracy. A SDS log shall be maintained on site and kept in a location that is accessible to employees. E Light projects will not provide SDS sheets on a project for items that are not on that site.

The SDS inventory log shall include the approximate quantity on site and the location of storage.

All employees will be informed of the location of the written program and all Safety Data Sheets (SDS's).

- Copies of the SDS's for all hazardous chemicals to which E Light employees may be exposed on the project will be kept by the supervisor and in the job trailer at each site. The SDS's will be kept in the order they appear on the SDS log and will be available for review to all employees during normal working hours.
- All vendors shall be required to supply an SDS sheet with all orders and the superintendent shall be responsible for ensuring the SDS on site are accurate and up to date. Do not accept delivery of hazardous classified material without a copy of the

current SDS attached to the delivery. Ensure the new SDS is entered into the log on site and placed with the log.

- All sub-contractors working on any job site for E Light are required to bring a copy of their hazard communications program to the site before working with any hazardous chemicals. Upon leaving the job site and taking all hazardous materials with them, they may take their copy of the hazard communications program with them.
- The site Superintendent will recommend to all employees, in case of an emergency take a copy of the applicable SDS's to the medical facility, if the emergency is caused by a chemical exposure.
- Field and Service employees can call the office and have any SDS's faxed, emailed to their location. In case of emergency faxed to the doctor's office.

Safety Data Sheets shall conform to the following:

The Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards. The information contained in the SDS is largely the same as the MSDS, except now the SDSs are required to be presented in a consistent user-friendly, 16-section format. This brief provides guidance to help workers who handle hazardous chemicals to become familiar with the format and understand the contents of the SDSs.

The SDS includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. The information contained in the SDS must be in English (although it may be in other languages as well). In addition, OSHA requires that SDS preparers provide specific minimum information as detailed in Appendix D of 29 CFR 1910.1200. The SDS preparers may also include additional information in various section(s).

Sections 1 through 8 contain general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures (e.g., firefighting). This information should be helpful to those that need to get the information quickly. Sections 9 through 11 and 16 contain other technical and scientific information, such as physical and chemical properties, stability and reactivity information, toxicological information, exposure control information, and other information including the date of preparation or last revision. The SDS must also state that no applicable information was found when the preparer does not find relevant information for any required element.

The SDS must also contain Sections 12 through 15, to be consistent with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS), but OSHA will not enforce the content of these sections because they concern matters handled by other agencies.

A description of all 16 sections of the SDS, along with their contents, is presented below:

Section 1: Identification

This section identifies the chemical on the SDS as well as the recommended uses. It also provides the essential contact information of the supplier. The required information consists of:

- Product identifier used on the label and any other common names or synonyms by which the substance is known.
- Name, address, phone number of the manufacturer, importer, or other responsible party, and emergency phone number.
- Recommended use of the chemical (e.g., a brief description of what it actually does, such as flame retardant) and any restrictions on use (including recommendations given by the supplier). 1

Section 2: Hazard(s) Identification

This section identifies the hazards of the chemical presented on the SDS and the appropriate warning information associated with those hazards. The required information consists of:

Section 3: Composition/Information on Ingredients

This section identifies the ingredient(s) contained in the product indicated on the SDS, including impurities and stabilizing additives. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed. The required information consists of:

Substances

- Chemical name.
- Common name and synonyms.
- Chemical Abstracts Service (CAS) number and other unique identifiers.
- Impurities and stabilizing additives, which are themselves classified and which contribute to the classification of the chemical.

Mixtures

- Same information required for substances.
- The chemical name and concentration (i.e., exact percentage) of all ingredients which are classified as health hazards and are:
 - Present above their cut-off/concentration limits or
 - Present a health risk below the cut-off/concentration limits.
- The concentration (exact percentages) of each ingredient must be specified except concentration ranges may be used in the following situations:
 - A trade secret claim is made,
 - There is batch-to-batch variation, or
 - The SDS is used for a group of substantially similar mixtures.

Chemicals where a trade secret is claimed.

- A statement that the specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret is required.

Section 4: First-Aid Measures

This section describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical. The required information consists of:

- Necessary first-aid instructions by relevant routes of exposure (inhalation, skin and eye contact, and ingestion).
- Description of the most important symptoms or effects, and any symptoms that are acute or delayed.
- Recommendations for immediate medical care and special treatment needed, when necessary.

Section 5: Fire-Fighting Measures

This section provides recommendations for fighting a fire caused by the chemical. The required information consists of:

- Recommendations of suitable extinguishing equipment, and information about extinguishing equipment that is not appropriate for a particular situation.
- Advice on specific hazards that develop from the chemical during the fire, such as any hazardous combustion products created when the chemical burns.
- Recommendations on special protective equipment or precautions for firefighters.

Section 6: Accidental Release Measures

This section provides recommendations on the appropriate response to spills, leaks, or releases, including containment and cleanup practices to prevent or minimize exposure to people, properties, or the environment. It may also include recommendations distinguishing between responses for large and small spills where the spill volume has a significant impact on the hazard.

The required information may consist of recommendations for:

- Use of personal precautions (such as removal of ignition sources or providing sufficient ventilation) and protective equipment to prevent the contamination of skin, eyes, and clothing.
- Emergency procedures, including instructions for evacuations, consulting experts when needed, and appropriate protective clothing.
- Methods and materials used for containment (e.g., covering the drains and capping procedures).
- Cleanup procedures (e.g., appropriate techniques for neutralization, decontamination, cleaning, or vacuuming; adsorbent materials; and/or equipment required for containment/clean up)

Section 7: Handling and Storage

This section provides guidance on the safe handling practices and conditions for safe storage of chemicals. The required information consists of:

- Precautions for safe handling, including recommendations for handling incompatible chemicals, minimizing the release of the chemical into the environment, and providing

advice on general hygiene practices (e.g., eating, drinking, and smoking in work areas is prohibited).

- Recommendations on the conditions for safe storage, including any incompatibilities. Provide advice on specific storage requirements (e.g., ventilation requirements)

Section 8: Exposure Controls/Personal Protection

This section indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure. The required information consists of:

- OSHA Permissible Exposure Limits (PELs), American Conference of

Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the safety data sheet, where available.

- Appropriate engineering controls (e.g., use local exhaust ventilation, or use only in an enclosed system).
- Recommendations for personal protective measures to prevent illness or injury from exposure to chemicals, such as personal protective equipment (PPE) (e.g., appropriate types of eye, face, skin or respiratory protection needed based on hazards and potential exposure).
- Any special requirements for PPE, protective clothing, or respirators (e.g., type of glove material, such as PVC or nitrile rubber gloves; and breakthrough time of the glove material).

Section 9: Physical and Chemical Properties

This section identifies physical and chemical properties associated with the substance or mixture. The minimum required information consists of:

- Appearance (physical state, color, etc.).
- Upper/lower flammability or explosive limits.
- Odor.
- Vapor pressure.
- Odor threshold.
- Vapor density.
- pH.
- Relative density.
- Melting point/freezing point.
- Solubility(ies).
- Initial boiling point and boiling range.
- Flash point.
- Evaporation rate.
- Flammability (solid, gas).
- Partition coefficient: n-octanol/water.
- Auto-ignition temperature.
- Decomposition temperature; and
- Viscosity.

The SDS may not contain every item on the above list because information may not be relevant or is not available. When this occurs, a notation to that effect must be made for that chemical property. Manufacturers may also add other relevant properties, such as the dust deflagration index (Kst) for combustible dust, used to evaluate a dust's explosive potential.

Section 10: Stability and Reactivity

This section describes the reactivity hazards of the chemical and the chemical stability information. This section is broken into three parts: reactivity, chemical stability, and other. The required information consists of:

Reactivity

- Description of the specific test data for the chemical(s). This data can be for a class or family of the chemical if such data adequately represent the anticipated hazard of the chemical(s), where available.

Chemical Stability

- Indication of whether the chemical is stable or unstable under normal ambient temperature and conditions while in storage and being handled.
- Description of any stabilizers that may be needed to maintain chemical stability.
- Indication of any safety issues that may arise should the product change in physical appearance.

Other

- Indication of the possibility of hazardous reactions, including a statement whether the chemical will react or polymerize, which could release excess pressure or heat, or create other hazardous conditions. Also, a description of the conditions under which hazardous reactions may occur.
- List of all conditions that should be avoided (e.g., static discharge, shock, vibrations, or environmental conditions that may lead to hazardous conditions).
- List of all classes of incompatible materials (e.g., classes of chemicals or specific substances) with which the chemical could react to produce a hazardous situation.
- List of any known or anticipated hazardous decomposition products that could be produced because of use, storage, or heating. (Hazardous combustion products should also be included in Section 5 (Fire-Fighting Measures) of the SDS.)

Section 11: Toxicological Information

This section identifies toxicological and health effects information or indicates that such data are not available. The required information consists of:

- Information on the likely routes of exposure (inhalation, ingestion, skin and eye contact). The SDS should indicate if the information is unknown.
- Description of the delayed, immediate, or chronic effects from short- and long-term exposure.

- The numerical measures of toxicity (e.g., acute toxicity estimates such as the LD50 (median lethal dose)) - the estimated amount [of a substance] expected to kill 50% of test animals in a single dose.
- Description of the symptoms. This description includes the symptoms associated with exposure to the chemical including symptoms from the lowest to the most severe exposure.
- Indication of whether the chemical is listed in the National Toxicology Program (NTP) Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in the International Agency for Research on Cancer (IARC) Monographs (latest editions) or found to be a potential carcinogen by OSHA.

Section 12: Ecological Information (non-mandatory)

This section provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment. The information may include:

- Data from toxicity tests performed on aquatic and/or terrestrial organisms, where available (e.g., acute, or chronic aquatic toxicity data for fish, algae, crustaceans, and other plants; toxicity data on birds, bees, plants).
- Whether there is a potential for the chemical to persist and degrade in the environment either through biodegradation or other processes, such as oxidation or hydrolysis.
- Results of tests of bioaccumulation potential, making reference to the octanol- water partition coefficient (Kow) and the bioconcentration factor (BCF), where available.
- The potential for a substance to move from the soil to the groundwater (indicate results from adsorption studies or leaching studies).
- Other adverse effects (e.g., environmental fate, ozone layer depletion potential, photochemical ozone creation potential, endocrine disrupting potential, and/or global warming potential).

Section 13: Disposal Considerations (non-mandatory)

This section provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices. To minimize exposure, this section should also refer the reader to Section 8 (Exposure Controls/Personal Protection) of the SDS. The information may include:

- Description of appropriate disposal containers to use.
- Recommendations of appropriate disposal methods to employ.
- Description of the physical and chemical properties that may affect disposal activities.
- Language discouraging sewage disposal.
- Any special precautions for landfill or incineration activities

Section 14: Transport Information (non-mandatory)

This section provides guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea. The information may include:

- UN number (i.e., four-figure identification number of the substance)¹.
- UN proper shipping name¹.

- Transport hazard class(es)1.
- Packing group number, if applicable, based on the degree of hazard2.
- Environmental hazards (e.g., identify if it is a marine pollutant according to the International Maritime Dangerous Goods Code (IMDG Code)).
- Guidance on transport in bulk (according to Annex II of MARPOL 73/783 and the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (International Bulk Chemical Code (IBC Code))).
- Any special precautions which an employee should be aware of or needs to comply with, in connection with transport or conveyance either within or outside their premises (indicate when information is not available).

Section 15: Regulatory Information (non-mandatory)

This section identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS. The information may include:

- Any national and/or regional regulatory information of the chemical or mixtures (including any OSHA, Department of Transportation, Environmental Protection Agency, or Consumer Product Safety Commission regulations)

Section 16: Other Information

This section indicates when the SDS was prepared or when the last known revision was made. The SDS may also state where the changes have been made to the previous version. You may wish to contact the supplier for an explanation of the changes. Other useful information also may be included here.

TRAINING

Training is to be formal, at orientation and on-the-job, presented prior to any exposure to hazardous materials, periodically throughout the year during safety meetings. Any time new substances, processes, procedures, or equipment is introduced to the work environment; affected employees must be trained in the new hazards.

Training must include:

- Methods of protection
- Physical hazards
- Where to obtain more personal protection information
- Emergency phone numbers
- Location of Haz Comm Program
- Details about the Program
- Labeling and markings
- Methods of detection

Employees must be instructed if they are asked to handle or use a hazardous material. If they have not been trained on the hazardous material, and are asked to handle, or use it, they must inform the supervisor for needed training.

Safety inspections must be performed periodically and whenever new hazards are presented, or when new substances, processes, procedures, or equipment are introduced to the work environment.

NON-ROUTINE TASKS

Since many tasks are not done on a routine basis, they will be handled through the specific training. It will be the supervisor's responsibility to provide training to his employees, on the performance of specific or specialized hazardous non-routine tasks.

However, if the product is a common product used routinely at home or for work on and off the job and it is not part of a specific task, no SDS or specific training will be required on common products.

ARTICLES

Are manufactured items, which is formed to a specific shape or design during manufacturing, which has end-use function dependent in whole, or part upon its shape or design during end use and which does not release or otherwise result in exposure to hazardous chemicals under normal use, such as ballasts, capacitors, conduit, most wire, j-boxes etc.

SUB-CONTRACTORS

E Light will inform the sub-contractor entering the job site of the written hazard communications program, and where to locate any SDS's. It will be the sole responsibility of the sub-contractor to properly train their employees according to the hazard communications program. Any sub-contractor that will be using a hazardous chemical that may or will expose different contractor's employees MUST immediately notify that contractor of the hazards, avoidance, PPE required and emergency procedures for the hazardous material that will be used.










CONTAINER LABELING

The Superintendent for each site has the responsibility to ensure all containers on the site are labeled as to what they contain and note the appropriate hazard warnings and part of body effected. Labeling shall be done in accordance with the new SDS system as detailed below and shall have the new Hazard Communication Pictograms. Labels shall include:

- Name, Address and Telephone Number
- Product Identifier
- Signal Word
- Hazard Statement(s)
- Precautionary Statement(s)
- Pictogram(s)

No container will be released for use until the above data is verified. Labels can be in common name, trade name, and actual name. Example: Window Wash, Window Cleaner, Windex. E Light will rely on manufacturers applied labels whenever possible and will ensure that these labels are maintained and not removed or defaced.

HCS Pictograms and Hazards

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