



## Section 10: Hazard Communication Program

### 1. General Information

- 1.1 Contractors must establish and maintain a written, comprehensive hazard communication program that complies with applicable federal and state law and includes:
  - A. A list of hazardous materials in the workplace
  - B. Material safety data sheets
  - C. Provisions for container labeling
  - D. An employee training program
- 1.2 Contact the EQ representative or the site EHS manager for specific hazard communication concerns relevant to the location and department where work is being performed.
- 1.3 Refer to the DOT *Emergency Response Guidebook* for information about hazardous material spills.

### 2. Hazardous Materials List

- 2.1 Contractors must prepare a hazardous materials list before the materials arrive on site.
- 2.2 The hazardous materials lists must contain:
  - A. The chemical name and common name used on the MSDS or container label.
  - B. The quantity of the chemical that will be stored on site.
  - C. The area where the hazardous material is stored.
  - D. The expected length of time the chemical will be stored on site.
- 2.3 The hazardous materials list must be prepared for each work area and updated within 30 days of the addition or removal of a hazardous material, or when the quantity stored changes significantly. The entire hazardous materials list must be updated annually.
- 2.4 Contractors may be requested to submit hard copies of the hazardous materials list and material safety data sheets to the EQ representative before the hazardous materials are brought on site.
- 2.5 The EQ representative will forward a copy of the list to the site EHS manager who will retain the copy for their files.
- 2.6 By receiving and forwarding this information, EQ does not imply acceptance of responsibility or guarantee completeness or accuracy of contractor submittals.
- 2.7 The use of hazardous materials at an EQ facility requires consultation with the site EHS manager.
- 2.8 Hazardous materials may not be stored on site without consent from the site EHS manager.

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### **3. Material Safety Data Sheets**

- 3.1 Contractors must maintain the most current material safety data sheets provided by the manufacturers and distributors of the material. If the contractor does not receive an MSDS from the manufacturer or distributor, the contractor should request one. As a general guideline, an MSDS dated 3 years earlier than the submission date should not be submitted to EQ without verification that it is the latest version of the document.
- 3.2 Beyond the identity information, the MSDS must provide information in the areas required by OSHA in 29 CFR 1910.1200(g) (2).
- 3.3 A copy of each MSDS must be maintained at the work site. The copy must be easily accessible to contractors, employees, and EQ personnel.

### **4. Container Labels**

- 4.1 Contractors must ensure that labels on incoming containers are not removed or defaced, and that containers are easily marked.
- 4.2 Each container must be labeled, logged, or marked with the identity of the hazardous chemical it contains, and it must show appropriate hazard warnings for employee protection. The hazard warning can be messages, words, pictures, or symbols used to convey the hazard. Labels must be legible, in English (plus any other language required), prominently displayed, and meet OSHA and DOT requirements.

### **5. Hazard Communications**

- 5.1 Contractors must have a means of informing employees of the hazardous materials associated with the work they perform, and communicating information on hazards in the EQ facilities at which they are working.
- 5.2 Contractors must train employees to recognize and avoid hazards and train them in the use of personal protective equipment to be used when working with hazardous materials.
- 5.3 Employee Information and Training
  - A. Contractors must establish a training and information program for employees potentially exposed to hazardous materials in their work area at the time of initial assignment, and whenever a new hazard is introduced to their work area. The discussion topics must include at a minimum:
    - 1. Existence of the hazard communication standard and its requirements.
    - 2. Operations in the work area where hazardous materials are present.
    - 3. Where the contractor will keep the written hazard evaluation procedures, communications program, hazardous materials list, and the required MSDSs.
  - B. Training must comply with OSHA standards and, at a minimum, focus on the following:

***Contractor Environmental, Health & Safety Manual***

1. How the hazard communication program is implemented on site, how to read and interpret information on labels and MSDSs, and how employees can obtain and use the available hazard information.
  2. Hazards of the materials in the workplace.
  3. Measures employees can take to protect themselves from hazards.
  4. Specific procedures put into effect by the contractor to provide protection, such as work practices and using personal protective equipment.
  5. Methods and observations, such as appearance or smell, workers can use to detect the presence of a hazardous material to which they may be exposed.
- C. Where necessary, EQ will provide training on the unique hazards that contractors may encounter at EQ facilities.
- D. For further information, contractors not familiar with the applicable State's hazard communication program are encouraged to contact the Department of Labor in the State where the site is located.
- E. Contractors must report any illness or injury known or suspected to be associated with hazardous material use or potential exposure while in EQ premises to the EQ representative.

5.4 Hazardous Materials

- A. Contractors are responsible for the safe use, storage, transportation, and disposal, in accordance with applicable laws, of chemicals or hazardous material used in the performance of their work.
- B. Contractors must have available for EQ a list of chemicals or materials used in the performance of their work and a copy of the MSDS for each material. The receipt of the list or MSDS by EQ does not relieve the contractor from requiring employees and other persons performing work to assume responsibility for the safe use, storage, and disposal of hazardous materials.
- C. Contractors must require their suppliers, agents, and employees of other persons performing work to use an approved substitute chemical or material in the place of a chemical or material that EQ requests not be used for the work.
- D. Chemicals or materials brought on site by employees and other persons performing work must bear a label stating the identity of the chemical or material, hazards associated with it, and the name of the responsible party bringing the chemical or material onto the site.
- E. Waste resulting from the work must be properly disposed of by the responsible contractor in accordance with local, State, and Federal regulations. If uncertain about proper waste disposal, contact the EQ EHS manager. Do not dispose of waste in site dumpsters.
- F. Hazardous materials, pollutants, and contaminants encountered or generated from soils or facilities in place prior to commencement of work, or from portions of the contract already completed by other contractors, are the responsibility of EQ. These will be disposed of as directed by the site EHS manager in accordance with applicable laws. The contractor must immediately notify EQ if unexpected

***Contractor Environmental, Health & Safety Manual***

hazardous substances, pollutants, and contaminants are encountered at the work site.

- G. Contractors are required to keep accurate records of the types and quantities of waste, including hazardous waste, and the facilities in which the wastes are treated, incinerated, or disposed. The contractor must provide EQ with copies of these records. Liquids (including muddy water) or chemicals should not be pumped or allowed to flow into a sewer. Do not clean equipment or change lubrication or pneumatic fluids in areas that are not equipped with spill containment and control facilities.