



Hazard Communication Program

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INTRODUCTION

The Hazard Communication Standard, also known as the Right-to-Know Act, was first enacted on November 25, 1983 by the Occupational Safety and Health Administration (OSHA). The standard was later modified with minor changes and technical amendments in March 1994 and most recently March 2012, revised to align with the Globally Harmonized System of Classification and Labelling of Chemicals, commonly known as GHS. The standard is referenced by title 29 Code of Federal Regulations (CFR) 1910.1200

The purpose of the standard is to insure that chemical hazards in the work place are identified and evaluated and that information concerning these hazards is communicated to technicians and employees. This transfer of information is to be accomplished by means of a comprehensive Hazard Communication Program (HCP). The HCP includes container labeling requirements, hazardous material warnings, Safety Data Sheets (SDS), and employee training. The standard is comprised of six major categories:

- *Hazard Determination*
- *Safety Data Sheets*
- *Chemical Labeling*
- *Technician/Employee Training*
- *The Written Program*
- *Trade Secrets*

The first category, **Hazard Determination** (29 CFR 1910.1200(d)), requires identification and evaluation of all hazardous materials used in the work place. This evaluation is based on two hazard categories, *listed* and *defined*.

Listed hazards are those included in one of the following references: Occupational Safety and Health Administration's (OSHA) *29 CFR 1910.1000 Z tables*, American Conference of Governmental Industrial Hygienist's (ACGIH) *Threshold Limit Values (TLV)*, the National Toxicology Program; or the International Agency for Research on Cancer.

Defined hazards are those specified by OSHA as physical or health hazards. Hazardous materials such as combustible liquids, oxidizers, corrosives, reproductive toxins, and non-toxins are considered physical and/or health hazards under the *Defined* hazards category.

The second category focuses on the **Safety Data Sheet** (29 CFR 1910.1200(g)). After the hazardous materials have been evaluated and identified, a SDS for each item must be obtained. Colors On Parade issues a SDS catalog containing data sheets for hazardous materials approved for use by Colors On Parade's Technical Department and Colors On Parade's Franchisee Advisory Committee. The

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SDS catalog is included with each van set-up. These SDS sheets contain specific chemical hazard information such as physical hazards, health hazards, physical routes of entry, exposure limits, precautions for safe handling, proper use, clean-up procedures after accidental spillage, personal protective equipment, emergency and first aid procedures, and the name address and telephone number of the responsible party to contact for additional information. All information on a SDS must be in English and be available to technicians and employees working with or near the hazardous materials. The SDS may also be in a second language at the discretion of the employer based on the request of technicians.

The third category, **Chemical Labeling** (29 CFR 1910.1200(f)), requires labels on all materials in the work place. The label should contain the identity of the material, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. Other appropriate warning information, such as pictures and/or symbols, may be used in conjunction with the hazard information. Labels must be legible and in English.

The fourth category, **Technician/Employee Training** (29 CFR 1910.1200(h)), requires that technicians and employees be provided with effective information and training on hazardous materials in their work area. This information and training must be provided at the time of the franchisee's or technician's initial assignment or whenever a new health hazard is introduced into the Colors on Parade system. The information and training shall include: Physical and health hazards, protective measures, labeling, and an explanation of Material Safety Data Sheets.

The fifth category, **The Written Program** (29 CFR 1910.1200(e)), requires full documentation of the actions taken to comply with all of the provisions of the standard and to list the responsible person(s) for each area of the program. Upon request, a copy of the written program must be made available to any franchisee, technician, employee, or OSHA official.

The sixth and final category of Hazard Communication involves manufacturer **Trade Secrets** (29 CFR 1910.1200(1)). The chemical manufacturer may withhold the chemical identity, including the chemical name and other specific information, from the MSDS. However under special conditions, this secret information may be obtained by health care professionals.

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OVERVIEW

In order to comply with 29 CFR 1910.1200 the following written Hazard Communication Program (HCP) is to be implemented for Franchisees, technicians, and Colors On Parade corporate personnel. To assist in establishing a comprehensive compliance program, the following individual has been placed in charge of the HCP.

Technical Training Instructor/Safety Officer
Contact Between 8:00am and 5:00pm Monday - Friday
(843)347-8818

If accidental spillage or over exposure occurs while handling hazardous materials sold by PPG or ART, please call the following 24 hour emergency hot line number:

PPG Industries, Inc.
One PPG Place
Pittsburgh, PA 15272
(412)434-4515 (U.S.)

The Corporate Safety Officer is responsible for being informed of both federal and state regulations pertaining to employee hazard communication. He or she establishes procedures to ensure that Colors On Parade is in compliance, and that this compliance is maintained. Original sign-off sheets designating that all employees and franchisees have read and understand the HCP will be kept on file by the Colors On Parade Corporate Safety Officer at the Conway, SC Corporate Office. A copy of the sign-off sheet will be filed by each respective Area Manager. This program must be followed by all Franchisees.

The Corporate Technical Department is responsible for ensuring that information contained in this program is current and enforced. A copy of this program is provided to all technicians and employees upon assignment, and a copy will be supplied to any technician and employee upon request. The Corporate Safety Officer can be contacted to request a copy of the program documentation. The program will be continually updated as new materials or hazards are introduced into the working environment or when OSHA regulations are modified. The HCP will be reviewed quarterly to ensure that it is current.

Members of the technical department will check all chemical purchases authorized by Colors on Parade, and verify that a Material Safety Data Sheet is received with each chemical *approved* for use in the Colors on Parade system. If a hazardous material is purchased from any vendor that does not include a SDS as part of the packaging, it is your right and responsibility to immediately notify the vendor and request the SDS. Every vendor is obligated by law to provide the SDS with every hazardous material purchase.

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CONTAINER LABELING

Franchisees and technicians are responsible for maintaining proper labeling on all containers of hazardous materials in their Colors On Parade mobile or stationary units. Area Manager Franchisees are responsible for monitoring compliance within their designated marketing area and reporting any violations to the Corporate Technical Department. A label is defined as any written, printed, or graphic material, such as a tag or a marking, that is displayed on or affixed to containers of hazardous materials. The following specific information is required on each label:

1. The identity of the chemical
2. Appropriate hazard warnings including both health and physical hazards.
3. Name and address of manufacturer or responsible party.

No chemical will be used as part of the Colors On Parade system until it has been approved by Colors On Parade's Corporate Technical Department. Colors On Parade's Technical and Distribution Departments make sure that all containers are properly labeled when a Franchisee accepts the initial operating unit set-up. Upon receipt and legal transfer of the initial operating unit set-up, the Franchisee becomes solely responsible for maintaining correct container labeling on the operating unit.

If materials are to be transferred to a separate or new container, the Franchisee must ensure that the new container is properly labeled, and that all secondary containers are labeled. Secondary labels can be an extra copy of the manufacturer's label or a generic label. All secondary labels must also list the material's identity, all hazard warnings, and the manufacturer or responsible party. To obtain assistance concerning the labeling of hazardous material containers contact the Corporate Safety Officer. The Corporate Safety Officer along with members of the technical department will review the labeling system annually to ensure the labeling program meets and/or exceeds the requirements in CFR 29 1910.1200 (1) trade secret.

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SAFETY DATA SHEETS (SDS)

The Corporate Safety Officer is responsible for maintaining and updating the SDS catalog of all hazardous materials in the Colors On Parade product line and included in the Franchisees' initial operating unit set-up. Franchisees are responsible for updating their SDS catalogs for any hazardous materials they carry, regardless of the source. Additionally, after receipt of initial operating unit set-up with the SDS catalog, Franchisees are responsible for updating the SDS catalog when purchasing hazardous materials. An SDS catalog must be available for each work area where hazardous materials are carried or stored. The SDS catalog must not be locked away where employees do not have immediate access during their work shifts.

The Corporate Safety Officer will also review incoming data sheets for new and significant health and/or safety information. The Corporate Safety Officer and Area Managers will ensure that this information is provided to all Franchisees and Corporate Employees. In turn, Franchisees are responsible for providing all updated information to their employees. Copies of all approved SDSs will be stored by the Corporate Safety Officer in a SDS manual at the Conway Corporate office, and by Franchisees at their office location and in every Colors On Parade operating unit. Each SDS catalogue must be reviewed quarterly for accuracy and completeness. The SDS system includes:

1. A current master inventory list of all SDS. The list will be indexed by number to the SDS referenced on the inventory list.
2. The chemical identity listed on each SDS shall be the same as used on the container label.
3. The chemical and common name of all ingredients determined to present a hazard shall appear on all SDS sheets.

The information on each SDS must include:

1. The physical and chemical characteristics of the chemical, including vapor pressure, flash point, etc.
2. The fire explosion and reactivity hazard(s) of the chemical, including the boiling point, flash point, and auto-ignition temperature.
3. Health hazards of the chemical mixture including signs and symptoms of exposure, medical conditions recognized as aggravated by exposure, and primary routes of entry.

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4. Permissible Exposure Limit (PEL) or any other exposure limit used or recommended by the manufacturer or importer.
5. Whether the chemical is listed as a carcinogen by the National Toxicology Program (NTP) or has been found to be a potential carcinogen by the American Conference of Government Industrial Hygienists (ACGIH) or OSHA.
6. The control measures for the chemical, including fire, engineering and personal protective equipment.
7. General precautions for safe handling and use, including protective measures during repair and maintenance of equipment involving the chemical.
8. Procedures for cleanup of spills and leaks.
9. Emergency first aid procedures.
10. Date the SDS was prepared or revised.
11. Name, address, and telephone number of manufacturer, importer, or responsible party to call in emergency situations.

The SDS originals in an SDS catalog must be kept on file by the Corporate Safety Officer, and by each Franchisee at their office and on each Colors On Parade operating unit. The SDS catalog is a critical component of the HCP and must be properly maintained by every member of the Colors on Parade organization. Again, each franchisee and technician must ensure that a current, up-to-date SDS catalog is located in every Colors on Parade operating unit. A new hazardous material may not be used as part of the Colors on Parade system until:

1. The product has been approved by the Corporate Technical Department.
2. A SDS has been obtained and is placed in the MSDS catalog located on each operating unit.

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HOW TO READ AND UNDERSTAND A SAFETY DATA SHEET (SDS)

Overview

The Safety Data Sheet (SDS) is the primary document in hazard communication. OSHA standards require manufacturers and importers to provide a SDS with each of the chemicals they ship. OSHA standards also require employers to have a SDS for each hazardous chemical they use.

The importance of the SDS can't be overstated. This form contains all known hazard and protection information on a hazardous chemical. The SDS is a guide to safety. OSHA has developed a sample Material Safety Data Sheet form that many companies are using. Although the agency doesn't insist that everyone use OSHA's form, OSHA does expect all SDS listings to include the same basic information. A Safety Data Sheet should include information on these topics:

HAZARD COMMUNICATION STANDARD: Safety Data Sheets

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., fire-fighting). This information should be helpful to those that need to get the information quickly. Section 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.

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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 responsible party and emergency 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).

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:

The hazard classification of the chemical (e.g., flammable liquid, category).

Signal word

Hazard statement(s)

Pictograms (the pictograms or hazard symbols may be presented as graphical reproductions of the symbols in black and white or be a description of the name of the symbol (e.g., skull and crossbones, flame).

Precautionary statement(s)

Description of any hazards not otherwise classified

For a mixture that contains an ingredient(s) with unknown toxicity, a statement describing how much (percentage) of the mixture consists of ingredient(s) with unknown acute toxicity. Please note that this is a total percentage of the mixture and not tied to the individual ingredient(s).

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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 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.

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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).

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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).

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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
- 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.

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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:

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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 9 (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 following 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 (K_{ow}) 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).

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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 landfills 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)
- UN proper shipping names
- Transport hazard class(es)
- Packing group number, if applicable, based on the degree of hazard
- 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 73/78 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).

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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.

Employer Responsibilities

Employers must ensure that the SDSs are readily accessible to employees for all hazardous chemicals in their workplace. This may be done in many ways. For example, employers may keep the SDSs in a binder or on computers as long as the employees have immediate access to the information without leaving their work area when needed and a back-up is available for rapid access to the SDS in the case of a power outage or other emergency. Furthermore, employers may want to designate a person(s) responsible for obtaining and maintaining the SDSs. If the employer does not have an SDS the employer or designated person(s) should contact the manufacturer or obtain one.

References

OSHA, 29 CFR 1910.1200(g) and Appendix D. United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS), third revised edition, United Nations, 2009. These references and other information related to the revised Hazard Communication Standard can be found on OSHA's Hazard Communication Safety and Health Topics page, located at: <http://www.osha.gov/dsg/hazcom/index.html>.

Disclaimer: This brief provides a general overview of the safety data sheet requirements in the Hazard Communication Standard (see 29 CFR 1910.1200(g) and Appendix D of 29 CFR 1910.1200). It does not alter or determine compliance responsibilities in the standard or the Occupational Safety and Health Act of 1970. Since interpretations and enforcement policy may change over time, the reader should consult current OSHA interpretations and decisions by the Occupational Safety and Health Review Commission and the courts for additional guidance on OSHA compliance requirements.

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Please note that states with OSHA-approved state plans may have additional requirements for chemical safety data sheets, outside of those outlined above. For more information on those standards, please visit: <http://osha.gov/dcsp/osp/statestandards.html>

This is one in a series of informational briefs highlighting OSHA programs, policies or standards. It does not impose any new compliance requirements. For a comprehensive list of compliance requirements of OSHA standards or regulations, refer to Title 29 of the Code of Federal Regulations. This information will be made available to sensory-impaired individuals upon request. The voice phone is (202)693-1999; teletypewriter (TTY) number: (877)889-5627.

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EMPLOYEE INFORMATION AND TRAINING

Each Franchisee must review the HCP and the SDS catalog with every new technician or employee before they may begin operations as a Colors On Parade technician. Additionally, before any new hazardous material is used on a Colors On Parade operating unit, each Franchisee must train technicians and employees on its' proper use. This training will include instruction on how to safely use the material and the potential hazards of using the new material. Specific training methods may include:

1. Classroom lecture
2. Handouts
3. Videos
4. Physical demonstration

All technicians and employees will attend additional training as needed to review the HCP and SDS. The minimum orientation and training for a new technician or employee under the Colors On Parade Hazard Communication must include:

1. An overview of the requirements contained in the Hazard Communication Standard, 29 CFR 1910.1200.
2. A review of hazardous materials used in Colors on Parade operations.
3. The location and availability of the Colors on Parade Hazard Communications Program.
4. The physical and health effects of the hazardous materials used by the Colors on Parade system.
5. Methods and observation techniques used to determine the presence or release of hazardous materials in the work area. (Transportation and Air Emissions Compliance Book).
6. How to lessen or prevent exposure to these hazardous materials through usage of control and work practices and personal protective equipment.
7. Steps taken by Colors on Parade to lessen or prevent exposure to the materials listed on the inventory list.

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8. Location of the SDS catalog.
9. Location of the hazardous material inventory list.
10. How to read labels and review SDS listings to obtain information

Before a new hazardous material is introduced into the workplace, each technician and employee will be informed and trained by the methods outlined in the Employee Training Guidelines established in the HCP. Additionally, technicians and employees will sign a form to verify that the written HCP was/is made available for review and that they understand the content of the HCP.

The Corporate Safety Officer and Area Manager are responsible for ensuring that the SDS on each new hazardous material approved by Colors On Parade is made available prior to the use of the material during daily operations. Each Franchisee is responsible for updating the SDS catalog on each of their Colors On Parade operating units. After training, each technician and employee will sign a form to verify that they attended the training.

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TECHNICIAN AND EMPLOYEE TRAINING GUIDELINES

I. Training objectives:

- A. Focus on safety attitudes.
- B. Increase awareness of the hazardous materials.
- C. How to prevent over exposure to hazardous materials.
- D. How to read and understand labels and MSDS listings.

II. Scope of training program:

- A. Hazardous materials in the work environment.
- B. Identifying hazardous materials.
- C. Avoiding over exposure to hazardous materials.
- D. Avoiding the release of hazardous materials into the environment.
- E. First aid procedures and practices involving hazardous materials.
- F. Using personal protective equipment.
- G. Review of the Hazard Communication Standard, 29 CFR 1910.1200.

III. Tools during the training program:

- A. Handout materials.
- B. Audio and visual aids.
- C. Demonstration of protective equipment and containers.
- D. Attendance record.

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E. Class discussion.

IV. Assessing effectiveness of training.

- A. Use a questionnaire to determine if training objectives were met.
- B. Determine if part of the training program may need to be revised.
- C. Seek verbal feedback to determine if there were any unanswered questions.
- D. Review training materials to ensure completeness.
- E. Determine how often technicians need repeat training.
- F. Use group participation to determine what the technicians learned.
- G. Verbally quiz the group to ensure technicians can read and understand the MSDS.

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HAZARD COMMUNICATION PROGRAM ACKNOWLEDGMENT

I have read and understand the contents of the Colors On Parade HCP. I have also been informed about the health risks associated with the improper handling of hazardous materials and agree to abide by the procedures and guidelines provided in the HCP and in training received from Colors On Parade's Corporate Technical Training Department. Furthermore, I understand that I am responsible for maintaining an updated master Material Safety Data Sheet (SDS) catalog on my operating unit) and for following proper procedures while handling Hazardous Materials as defined in the SDS. I understand that I am responsible for having all SDS listings on all required substances, no matter the source of the material. I agree to abide by the HCP and will direct any questions to the Corporate Safety Officer.

Technicians Name (Print) _____ (Seal)

Technicians Name (Signature) _____ (Seal)

(DATE) _____

Witness Name (Print) _____ (Seal)

Witness Name (Signature) _____ (Seal)

(DATE) _____