



**HAZARD COMMUNICATION
PROGRAM**

SHENANDOAH STEEL LLC

Hazard Communication Program

COMPANY POLICY

To ensure that information regarding the dangers of all hazardous chemicals used by Shenandoah Steel by all affected employees, the following hazardous information program has been established.

All work units of the company will participate in the Hazard Communication Program. This written program will be available in the Carrollton office for review by any interested party.

CONTAINER LABELING

The General Superintendent, Safety Manager, or job-site foreman will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning and list the name and address of the manufacturer.

The General Superintendent, Safety Manager, or job-site foreman will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels that have the identity and the appropriate hazard warning. For assistance with labeling, see the General Superintendent, Safety Manager, or job-site foreman.

The General Superintendent and Safety Manager will provide Labeling Container information to all contractors.

The General Superintendent and Safety Manager will review the company labeling procedures annually and update as required.

MATERIAL SAFETY DATA SHEETS (MSDS)

The General Superintendent and Safety Manager are responsible for establishing and monitoring the company MSDS program. They will make sure procedures are developed to obtain the necessary MSDSs and will review incoming MSDSs for new or significant health and safety information. They will see that any new information is passed on to affected employees.

Copies of MSDSs for all hazardous chemicals in use will be kept on the current job-site. MSDSs will be available to all employees during each work shift. If an MSDS is not available, immediately contact the General Superintendent, Safety Manager, or job-site foreman.

EMPLOYEE TRAINING AND INFORMATION

The General Superintendent and Safety Manager are responsible for the company employee training program. They will ensure that all program elements specified below are carried out. Prior to starting work, each new employee of Linden Steel will receive the following information and training:

An overview of the requirements contained in the Hazard Communication Standard.

Hazardous chemicals present at his/her workplaces.

Physical and health risks of the hazardous chemicals.

The symptoms of overexposure.

How to determine the presence of release of hazardous chemicals in his/her workplace.

How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment.

Steps the company has taken to reduce or prevent exposure to hazardous chemicals.

Procedures to follow if employees are overexposed to hazardous chemicals.

How to read labels and review MSDSs to obtain hazard information.

Location of the MSDS file and written hazard communication program.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform hazardous non-routine tasks. Some examples of non-routine are: confined space entry, tank cleaning and painting reactor vessels. Prior to starting work on such projects, each affected employee will be given information by the General Superintendent, Safety Manager, or job-site foreman about hazardous chemicals he/she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use and steps the company is using to reduce the hazards, including ventilation, respirators, presence of another employee and emergency procedures.

EMPLOYEE TRAINING AND INFORMATION

Required personnel protective equipment is available from the General Superintendent, Safety Manager or job-site foreman. Any employee found in violation of personnel protective equipment requirements may be subject to disciplinary actions up to and including discharge.

EMERGENCY RESPONSE

Any incident of overexposure or spill of a hazardous chemical/substance must be reported to the job-site foreman, General Superintendent or Safety Manager at once.

The General Superintendent, Safety Manager, or job-site foreman will be responsible for insuring that proper emergency response actions are taken in leak/spill situations.

RECORD KEEPING

Records of employee training and employment acknowledgment copies. Records of any employee accidental over exposure to a hazard. Records of any environmental testing.

INFORMING CONTRACTORS

It is the responsibility of the General Superintendent or job-site foreman to provide contractors with information about hazardous chemicals their employees may be exposed to on a job-site and suggested precautions for the contractor's employees.

It is the responsibility of the General Superintendent or job-site foreman to provide contractors with information about Container Labeling for hazardous chemicals. All contractors will be provided with a copy of the company's Hazard Communication Program and all applicable MSDSs. The General Superintendent and the job-site foreman will be responsible for obtaining copies of Hazard Communication Programs from all on-site employers/subcontractors. This information will be made available to all Linden Steel employees through the job-site foreman.

LIST OF HAZARDOUS CHEMICALS

The only known hazardous chemicals used by our employees are Oxygen, Acetylene, Aerosol Paint, Diesel Fuel, Hydraulic Fluid, Gasoline, Welding Rods, Carbon and Alloy Steels, Portland Cement and Propane.

Shenandoah Steel LLC

Bonnie Mendelson
President

Listing of Hazardous Chemicals

- (AA) Oxygen
- (BB) Acetylene
- (CC) Aerosol Paint
- (DD) Diesel Fuel
- (EE) Hydraulic Fluid
- (FF) Gasoline
- (GG) Welding Electrodes
- (HH) Carbon and Alloy Steel
- (II) Portland Cement (Concrete)
- (JJ) Propane Gas

JOB HAZARD ANALYSIS

Contract No: Major Portion of Work: Reinforcing Steel	Project: Date: Estimated Start Date:		
Item	Phases of Work	Safety Hazard	Precautionary Action Taken
Rebar	Drilled Shafts	Weight of cage being built Cutting cage to length Lifting bars up on horse	Use cross bars that will support the weight. Use safety goggles. Use proper lifting methods. Lift with legs.
Rebar	Grade Beams	Back strain Hand Injuries	Do not lift, unless you are directly over the load. Be sure to wear leather gloves.
Rebar	S.O.G.	Back strain Eye injuries Hand injuries	Use proper lifting methods, don't overload. Use burning goggles when using torches. Use care when using bolt cutters.
Rebar Safety	Structural Slabs & Walls	Falling Overhead hoisting Tripping hazards	Make sure handrails are in place. Use belts. Always be 100% tied off above 6' when working on walls or columns or any other area that requires you to be above 6'. Do not stand under loads, wear hardhats, use tag lines. Pick up all bundle wire and trash.
<u>Contractor (Signature & Date)</u> Shenandoah Steel LLC			
Report discussed with Contractor/Superintendent on			
Project Engineer (Signature)			