

# **OPS-SH-0011**

## **Hazard Communication Policy**

| <b>Revision History</b>                                                                                                                                                                                            |             |                       |                    |                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------------|--------------------|------------------------------------------------|
| <b>Rev</b>                                                                                                                                                                                                         | <b>Date</b> | <b>Document Owner</b> | <b>Approved By</b> | <b>Issue Purpose</b>                           |
| 0                                                                                                                                                                                                                  | 09/12/2022  | R. Courtney           | JC                 | Create new policy                              |
| 1                                                                                                                                                                                                                  | 07/29/2026  | R. Strahan            | NR, RS, RG         | Update policy to separate by topic and content |
|                                                                                                                                                                                                                    |             |                       |                    |                                                |
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## **1 Purpose**

The purpose of this policy is to establish Ampirical's management system requirements for identifying, communicating, and controlling hazards associated with chemicals used, stored, or encountered during company work. This policy defines the minimum requirements for maintaining a written Hazard Communication Program, chemical inventory, container labeling system, Safety Data Sheet access, employee communication, and contractor coordination in accordance with OSHA Hazard Communication requirements.

## **2 Scope**

This policy applies to Ampirical employees, temporary workers, and contractors who may use, store, handle, transport, or otherwise be exposed to hazardous chemicals during work activities. It applies to office, shop, warehouse, field, project, and client-controlled work locations where hazardous chemicals are present under normal conditions of use or in foreseeable emergencies.

When Ampirical performs work at a client-owned or client-controlled location, the client's written hazard communication requirements shall be followed when they are more stringent or site-specific. Ampirical requirements remain applicable to Ampirical-controlled work activities, employees, subcontractors, chemical approvals, SDS access, labeling expectations, and training unless superseded by a more protective client requirement.

## **3 Introduction**

- Ampirical maintains this Hazard Communication policy as part of its corporate safety management system. The policy is intended to translate regulatory requirements into clear work expectations that can be assigned, verified, and enforced across company operations.
- The policy establishes how Ampirical identifies hazardous chemicals, maintains the chemical inventory, obtains and controls Safety Data Sheets, verifies container labeling, communicates chemical hazards, and trains affected employees before exposure occurs.
- Compliance with this policy is mandatory. Managers, supervisors, employees, and contractors shall implement requirements applicable to their work and shall correct or escalate deficiencies when chemical hazard information, labeling, SDS access, training, or work controls are incomplete. Implementation of this policy includes the following requirements:
  - Each work location shall maintain chemical controls consistent with this policy and any applicable client or site-specific requirements.
  - The written Hazard Communication Policy, chemical inventory, and SDS information shall be made available to employees, designated representatives, and regulatory officials upon request.
  - Chemical hazard information shall be current, accessible during the work shift, and communicated before employees perform work involving hazardous chemicals.

- Employees have the right and responsibility to review labels, SDSs, chemical inventory information, and applicable work instructions before using or being exposed to hazardous chemicals.
- Work shall not proceed when required hazard communication information or protective measures are missing, unclear, or not understood.

## 4 Definitions

### 4.1 Hazard Communication Standard (HAZCOM/HCS)

- OSHA's requirement for communicating chemical hazards to employees through a written program, container labels and other warnings, Safety Data Sheets, employee information and training, and methods for communicating hazards during non-routine tasks and multi-employer work.

### 4.2 Safety Data Sheets (SDS)

- A standardized document prepared by the chemical manufacturer, importer, or distributor that describes the chemical's hazards, required precautions, emergency response information, exposure controls, storage requirements, and other information needed for safe use.

### 4.3 Globally Harmonized System (GHS)

- A hazard classification and communication framework used to standardize chemical labels, pictograms, signal words, hazard statements, precautionary statements, and SDS format so chemical hazard information is presented consistently.

### 4.4 Hazard Communication Program (HCP)

- A written, workplace-specific system describing how Ampirical implements chemical inventory control, labeling, SDS access, employee information and training, non-routine task communication, and multi-employer coordination for hazardous chemicals.

## 5 Responsibility

### 5.1 Supervisors/Managers

- Ensure this policy is implemented within their areas of responsibility, and that chemical-related work is planned, supervised, and performed in accordance with applicable controls.
- Ensure hazardous chemicals are identified before use and included on the applicable chemical inventory.
- Ensure SDSs are available for hazardous chemicals before they are introduced to the workplace.
- Verify that primary and secondary containers are labeled, tagged, or otherwise marked in accordance with this policy.
- Confirm affected employees receive required hazard communication training before assignment and when new chemical hazards are introduced.
- Review non-routine tasks for chemical exposure potential and communicate required precautions before work begins.

- Coordinate with contractors, host employers, and client representatives to exchange chemical hazard information, SDS access methods, labeling systems, and protective measures.
- Correct deficiencies identified through inspections, observations, audits, incident reviews, or employee reports and escalate unresolved issues to safety leadership.

## 5.2 Employees

- Follow this policy, training, SDS instructions, labels, work plans, and supervisor direction when working with or around hazardous chemicals.
- Review the SDS and label information before using a chemical for the first time or when unfamiliar hazards are present.
- Use required engineering controls, administrative controls, safe work practices, and personal protective equipment.
- Label secondary containers unless the material is transferred for immediate use by the employee performing the transfer.
- Stop work and notify supervision when a container is unlabeled, a label is damaged or illegible, an SDS is unavailable, or required controls are not in place.
- Report spills, releases, exposures, damaged containers, or other chemical-related concerns immediately.
- Participate in required training and ask questions when chemical hazards or protective measures are not understood.

# 6 Procedure

## 6.1 Chemical Inventory

- Each applicable work location shall maintain a current list of hazardous chemicals known to be present. The chemical name or product identifier on the inventory shall match the corresponding SDS and container label where practicable.
- The chemical inventory shall be reviewed when new chemicals are introduced, chemicals are removed from service, work locations change, or at least annually. Chemicals shall not be purchased, brought on site, or placed into use until required SDS information is available and the chemical has been reviewed under the applicable approval process.

## 6.2 Safety Data Sheets (SDS)

- An SDS shall be maintained for each hazardous chemical used or stored by Ampirical. SDSs shall be accessible to employees during their work shift through the approved safety management system, site SDS station, project file, or other approved method that provides timely access without barriers.
- Purchasing or accepting a hazardous chemical without an available SDS is prohibited unless reviewed and approved by Safety or responsible management before use. Additional monitoring shall be performed whenever changes in equipment, processes, work activities, or site conditions may affect employee noise exposure levels or hearing protection effectiveness.

- Employees shall be informed of how to access SDSs for the chemicals in their work area. Supervisors shall verify that electronic SDS access remains available during the shift or that an alternate method is provided when electronic access is not practical.
- SDS records shall be retained in the SDS library for as long as the chemical is used or stored and shall be updated when revised SDSs are received or when chemical information changes.

### 6.3 Non-Routine Tasks

- Before employees perform a non-routine task that may involve hazardous chemical exposure, the supervisor or responsible person shall evaluate the task and communicate the chemical hazards, SDS information, required controls, PPE, spill or release response expectations, waste handling requirements, and emergency policies. Work shall not begin until affected employees understand the hazards and controls.

### 6.4 Labeling

- All hazardous chemical containers shall be labeled, tagged, or otherwise marked so employees can identify the material and understand the associated hazards. Manufacturer labels shall not be removed, defaced, or covered unless immediately replaced with required information. At a minimum, shipped container labels shall include:
  - Product identifier (name).
  - Signal word (danger or warning).
  - Hazard statement(s).
  - Pictogram(s).
  - Precautionary statement(s).
  - Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- Supervisors and employees are responsible for verifying that containers in their work area remain properly labeled and legible. Damaged, missing, or incomplete labels shall be corrected before the chemical is used.
- Secondary containers shall be labeled with the product identifier and appropriate hazard information unless the container is intended only for immediate use by the employee who performs the transfer during the same work shift.
- Workplace labels or other forms of warning shall be legible, in English, and prominently displayed on the container or readily available in the work area throughout each work shift.
- Additional languages may be used when needed for employee understanding, provided the required information is also presented in English.
- Ampirical shall use a GHS-consistent labeling approach for secondary containers unless another approved site-specific labeling system communicates the required hazard information.
- Portable containers do not require a label only when the material is transferred from a labeled container and remain under the immediate control and immediate use of the employee who performed the transfer.

- If a portable or secondary container will be used by more than one employee, left unattended, stored, or used beyond the immediate task or shift, it shall be labeled before use continues.
- Containers received from vendors without required labels, with unreadable labels, or with labels that do not match the product shall be rejected, quarantined, or otherwise controlled until corrected.

## 6.5 Pictograms and Hazards

|                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Health Hazard</b><br><br><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> | <b>Flame</b><br><br><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> | <b>Exclamation Mark</b><br><br><ul style="list-style-type: none"> <li>• Irritant (skin and eye)</li> <li>• Skin Sensitizer</li> <li>• Acute Toxicity (harmful)</li> <li>• Narcotic Effects</li> <li>• Respiratory Tract Irritant</li> <li>• Hazardous to Ozone Layer (Non-Mandatory)</li> </ul> |
| <b>Gas Cylinder</b><br><br><ul style="list-style-type: none"> <li>• Gases Under Pressure</li> </ul>                                                                                                                                                  | <b>Corrosion</b><br><br><ul style="list-style-type: none"> <li>• Skin Corrosion/ Burns</li> <li>• Eye Damage</li> <li>• Corrosive to Metals</li> </ul>                                                                 | <b>Exploding Bomb</b><br><br><ul style="list-style-type: none"> <li>• Explosives</li> <li>• Self-Reactives</li> <li>• Organic Peroxides</li> </ul>                                                                                                                                             |
| <b>Flame Over Circle</b><br><br><ul style="list-style-type: none"> <li>• Oxidizers</li> </ul>                                                                                                                                                       | <b>Environment (Non-Mandatory)</b><br><br><ul style="list-style-type: none"> <li>• Aquatic Toxicity</li> </ul>                                                                                                        | <b>Skull and Crossbones</b><br><br><ul style="list-style-type: none"> <li>• Acute Toxicity (fatal or toxic)</li> </ul>                                                                                                                                                                        |

## 6.6 Example Label

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>HS05<br/>Batch number: 85L6543</p> <p></p> <p><b>Warning</b><br/>Harmful if swallowed</p> <p>Wash hands and face thoroughly after handling. Do not eat, drink or smoke when using this product. Dispose of contents/container in accordance with local, state and federal regulations.</p> <p><b>First aid:</b><br/>If swallowed: Call a doctor if you feel unwell. Rinse mouth.</p> <p>GHS Example Company, 123 Global Circle, Anyville, NY 130XX<br/>Telephone (888) 888-8888</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 6.7 Multi-Employer Job Sites and Multi-Worksite Coordination

- When Ampirical employees, contractors, clients, or other employers may be affected by hazardous chemicals at a shared work location, responsible supervision shall coordinate hazard communication before work begins. The coordination shall include, as applicable:
  - How SDSs will be shared or accessed.
  - Precautionary measures which are required to protect employees during normal operations, non-routine tasks, and foreseeable emergencies.
  - The labeling system used at the work location and any site-specific requirements that apply.

## 7 Training

- Ampirical shall provide Hazard Communication training before employees are assigned work involving hazardous chemicals, when new chemical hazards are introduced, and when changes to work activities, labeling, SDS access, or controls require additional instruction.
- Training shall be delivered by a qualified person using an approved method, such as instructor-led training, electronic training, site orientation, toolbox discussion, or task-specific briefing, and shall be documented.
- Training shall be job-specific and cover, at a minimum, the following:
  - OSHA Hazard Communication requirements and this policy.
  - Chemical hazards present in the employee's work area or assigned tasks.
  - Location and access to this policy, the chemical inventory, SDSs, and site-specific information.
  - How to recognize chemical presence, release, leaks, spills, alarms, or other warning signs.
  - Applicable physical, health, and other chemical hazards.
  - How to read and use labels, pictograms, signal words, hazard statements, precautionary statements, and SDSs.
  - Required controls, PPE, safe work practices, storage, spill response, first aid, emergency response, secondary container labeling, non-routine task requirements, and multi-employer or client-site communication.
- Employees who handle, store, transfer, apply, dispose of, or otherwise manage hazardous chemicals or chemical waste shall receive task-specific instruction before performing the work.
- Managers and supervisors shall verify training completion before assignment and ensure records identify the employee, topic, completion date, delivery method, and any site- or task-specific content.

## 8 References

29 CFR 1910.1200  
29 CFR 1910.120