	Hazard Communication				
Control number:	HSE-P-16	Revision date:	8/15/2024	Rev #:	0
Approved by:	Derrick Landry	Revised by:	Madison Myers	MOC#:	N/A

PURPOSE


The purpose of this program is to communicate to employees and visitors the occupational exposures and safeguards of hazardous chemicals in the workplace.

1.0 GENERAL INFORMATION

- A. Peak NDT Solutions will rely on the evaluation performed by chemical manufacturers and importers regarding specific chemical identity and the hazards associated with that chemical.
- B. Peak NDT Solutions will consider a chemical or solid, a physical hazard, based upon scientific study, if it is a combustible liquid, a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable, or water reactive.


2.0 CHEMICAL INVENTORY

- A. Peak NDT Solutions shall maintain an inventory of all hazardous chemicals being used including a corresponding Safety Data Sheet (SDS). Peak NDT Solutions will keep this inventory current with regard to purchases and storage of chemicals and will make such listing readily available and accessible to employees and others who wish to resource it.
- B. Any sub-contractor used by Peak NDT Solutions will be required to supply Safety Data Sheets for respective chemicals brought to the job site by their employees. Peak NDT Solutions will add such chemicals to its own listing prior to presenting it to the customer representative.
- C. Peak NDT Solutions will add newly acquired chemicals to its existing inventory list while deleting those no longer in use by Peak NDT Solutions.
- D. The chemical inventory listing will be evaluated at least annually.



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3.0 CONTAINER LABELING


- A. Company personnel will ensure that each shipment of chemicals delivered displays proper labeling, or it will not be accepted. Labeling shall be in English, and in such instances as an employee of Peak NDT Solutions does not speak or understand the English language; efforts will be made by Peak NDT Solutions to have such applicable documents communicated to the employee in the language of his origin. When the employee is that of the customer or other contractor, Peak NDT Solutions shall reasonably expect such customer or contractor to assist in providing such accommodations.
- B. All chemicals employees will use, except for small amounts placed in other containers(s) for immediate use, will be labeled. No unmarked container of any size will be left in the work area unattended. Chemicals designated for immediate use should be returned to the original container when the employee is finished with its use. Chemicals that will remain in the container for subsequent work periods will result in the container being labeled for that particular chemical, and then only that chemical will be placed into that container until it is properly disposed of.
- C. Peak NDT Solutions will rely on manufacturer applied labels whenever possible, and will ensure that these labels are maintained. Containers where the contents are known and which display no label, or on which the manufacturer's label has been removed, will be re-labeled either by writing directly onto the container with a weather-resistant marker or applying an adhesive label for proper identification.
- D. Employees are strictly prohibited from dispensing chemicals from an unknown container into another container for immediate use. Additionally, Peak NDT Solutions will require all contractors to restrict its employee from exercising the same practice while on customer property.
- E. In accordance with OSHA requirements, Peak NDT Solutions will require that each container of hazardous chemicals or other hazardous substances in the workplace, be marked, tagged, or labeled with the following:
 - Product identifier; signal word; hazard statement(s); pictogram(s); precautionary statement(s); and name, address, and telephone number of the chemical manufacturer, importer or other responsible party.

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- Sample Label:

SAMPLE LABEL	
<p>PRODUCT IDENTIFIER</p> <p>CODE _____</p> <p>Product Name _____</p> <p>SUPPLIER IDENTIFICATION</p> <p>Company Name _____</p> <p>Street Address _____</p> <p>City _____ State _____</p> <p>Postal Code _____ Country _____</p> <p>Emergency Phone Number _____</p> <p>PRECAUTIONARY STATEMENTS</p> <p>Keep container tightly closed. Store in cool, well ventilated place that is locked.</p> <p>Keep away from heat/sparks/open flame. No smoking.</p> <p>Only use non-sparking tools.</p> <p>Use explosion-proof electrical equipment.</p> <p>Take precautionary measure against static discharge.</p> <p>Ground and bond container and receiving equipment.</p> <p>Do not breathe vapors.</p> <p>Wear Protective gloves.</p> <p>Do not eat, drink or smoke when using this product.</p> <p>Wash hands thoroughly after handling.</p> <p>Dispose of in accordance with local, regional, national, international regulations as specified.</p> <p>In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO₂) fire extinguisher to extinguish.</p> <p>First Aid</p> <p>If exposed call Poison Center.</p> <p>If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.</p>	<p>HAZARD PICTOGRAMS</p> <div style="display: flex; justify-content: space-around;">   </div> <p>SIGNAL WORD</p> <p>Danger</p> <p>HAZARD STATEMENT</p> <p>Highly flammable liquid and vapor. May cause liver and kidney damage.</p> <p>SUPPLEMENTAL INFORMATION</p> <p>Directions for use</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Fill weight: _____ Lot Number _____</p> <p>Gross weight: _____ Fill Date: _____</p> <p>Expiration Date: _____</p>

- F. Containers found in the workplace which does not display appropriate hazard warnings or labels, will be marked "Do Not Use until Properly Labeled", by the employee. Such container will then be isolated to prevent the inadvertent use of its contents by an unsuspecting employee.

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G. When shipping any container or piece of equipment, the person who signs the shipping papers is responsible for ensuring that the container is properly labeled and clearly marked.

H. The HSE Manager will conduct periodic inspections to ensure that the use & care of labels and other forms of warnings are not defaced or removed. The information on labels may differ from manufacturer to manufacturer, but all labels should provide the following information, at a minimum, prior to acceptance into the warehouse or on a temporary job site:

1. Chemical Name;
2. Health Hazards;
3. Physical hazard;
4. Reactivity;


4.0 SAFETY DATA SHEETS (SDS)

A. Chemical manufacturers are responsible for developing SDSs. Peak NDT Solutions shall maintain an SDS for each chemical used. Should a container arrive to Peak NDT Solutions or a temporary job site without the SDS, the Purchasing Agent will contact the respective manufacturer or distributor to request appropriate Safety Data Sheets.

B. SDSs can be maintained at the primary work site, but shall also be readily accessible in each work area in case of an emergency. SDS must be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director.

C. Peak NDT Solutions will consider an SDS acceptable when it contains the following information, at a minimum:


1. The chemical and common name(s) of all ingredients, which make up the chemical or other hazardous substance.
2. Physical and chemical characteristics of the hazardous chemical (such as vapor pressure and flashpoint).
3. The physical hazards of the hazardous chemical including the potential for fire, explosion and reactivity.

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4. The health hazards of the hazardous chemical including signs and symptoms of exposure, and any medical condition which is generally recognized as being aggravated by exposure to the chemical.
5. The primary routes of exposure.
6. The OSHA permissible exposure limit.
7. Whether the chemical or substance is a potential carcinogen.
8. Applicable precautions for safe handling and use, as known by the chemical manufacturer, importer, employer of chemist who mixed the solution and what to do if chemical is spilled.
9. Control measures for safe use, such as appropriate safe work practices, engineering controls, and personal protective equipment.
10. Emergency and first aid procedures.
11. The date of preparation of the Safety Data Sheet, or the last change made to it.
12. The name, address and telephone number of the chemical manufacturer or importer.

5.0 EMERGENCY ACTIONS


- A. Employees, who witness or are involved in an overexposure incident or exposure to any hazardous substance in the workplace, should notify the following:
 1. The HSE Manager,
 2. The Customer Representative, and
 3. The local emergency response telephone number
- B. When an employee experiences a chemical contact to their eyes, he/she must be taken to an eye wash station immediately and should rinse both eyes with clean running water for at least 15 minutes.
- C. An employee who has skin exposure should flush the affected area with clean running water for at least 15 minutes.

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- D. Employees who are conscious and have been exposed to a chemical or other hazardous substance should be taken immediately to a source of clean fresh air/water.
- E. Administering personnel should make every attempt to keep an unconscious employee's airway open, and "Rescue Breathing" should be started for the employee until normal respiration begins or trained medical personnel arrive.
- F. Supervisory personnel should always have assembly areas designated so as to take head count of all individuals in the work crew, in the event of an emergency.

6.0 COMMUNICATION OF HAZARDS

- A. During pre-job Safety Meetings & the Job Safety Analysis, Peak NDT Solutions's Onsite Supervisor will communicate and provide employees as well as other employers access to safety data sheets for each hazardous chemical that personnel may be exposed to while working, precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and any foreseeable emergencies. Additionally, Safety Meetings & JSAs shall communicate the hazards of non-routine tasks being performed that might expose personnel to chemical hazards contained in unlabeled containers, vessels and/or piping.
- B. Consult with process operators when on temporary job sites, in order to obtain specific information concerning process hazards. Such information may be related to:
 1. Applicable Lockout/Tagout provisions (29 CFR 1910.147),
 2. Operating temperatures on equipment and surrounding piping systems (29 CFR 1910.119),
 3. Facility emergency actions and alarms (29 CFR 1910.38),
 4. Required personal protective equipment for the area (29 CFR 1910.132), and
 5. Valves, switches and other controls, which are "off limits" to outside personnel (29 CFR 1910.119).


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7.0 MANAGEMENT RESPONSIBILITIES

- A. The HSE Manager will have the responsibility of implementing, revising and maintaining a written Hazard Communication program at each workplace that describes how safety data sheets, labels, other forms of warning & employee information will be met. Upon request, this program shall be made available to employees, their designated representatives, other employers and the Assistant Secretary & the Director.
- B. Additionally, Peak NDT Solutions will provide Client Representatives & 3rd Party personnel with information concerning hazardous chemicals at job sites including Safety Data Sheets, precautionary measures to be taken & information on labeling systems. When employees travel between multi job sites, Peak NDT Solutions's written program shall be kept at a primary job site. If there is no primary, then the program should be sent with employees.
- C. Peak NDT Solutions also will have the additional responsibility to ensure that the program is current and that all information is communicated to employees on a consistent basis.
- D. Peak NDT Solutions will ensure that employees have the appropriate personal protective equipment required to protect the employee from known hazards, supplied at no cost to the employee.

8.0 EMPLOYEE RESPONSIBILITIES


- A. Employees have the responsibility to learn and understand the provisions of Peak NDT Solutions's "Hazard Communication Program".
- B. Employees should understand how to access the resource materials safety data sheets (SDS), and should know how to seek help for clarification when necessary.
- C. Employees should understand Peak NDT Solutions's labeling requirements as well as its policy concerning the use and storage of chemicals.
- D. Employees are responsible for evaluating their respective work areas and obtaining a real familiarity with the location of fixed obstructions, which can be potential lower leg, and above head hazards.

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- E. Supervisory personnel are to complete a Job Safety Analysis Report (JSA) prior to the start of each and every temporary job site activity. For the purpose of this policy, Peak NDT Solutions will consider the JSA as the primary hazard communication instrument the supervisor can use while on the job site. JSA's are to be submitted immediately upon job completion.
- F. Employees are responsible for conducting themselves professionally, and in a manner indicative of someone who has concern for the safety not only of themselves, but also of others. Behavior detrimental to the overall safe completion of any Company-authorized activity will result in the individual's immediate removal from the job site, and subsequent disciplinary action.
- G. New employees have the responsibility for maintaining a close and inquisitive relationship with supervisory personnel and other more experienced employees. The first few days of an employee's employment will be critical to the overall safety efforts of Peak NDT Solutions and to the employee's acclimatization to prescribed work procedures.
- H. All employees are responsible for reviewing Station Bills on offshore rigs/crew boats, and becoming familiar with their respective roles and assignments in emergency situations. Employees are to be orientated to the elements of the respective customer's Safety Manual, prior to deployment. A signed acknowledgement shall be filed on each employee who has received this orientation.

9.0 EMPLOYEE TRAINING

- A. Peak NDT Solutions shall ensure employees are provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Chemical-specific information must always be available through labels and safety data sheets.
- B. The following topics will be covered, at a minimum:
 - 1. An explanation of the requirements contained in the Hazard Communication Standard (29 CFR 1910.1200);
 - 2. Operational training specific to their work area where hazardous chemicals are present;

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3. Location and availability of Peak NDT Solutions's written program;
4. Physical and health effects of hazardous chemicals;
5. Information and training shall be designed to cover the following categories of hazards:
 - Explosives,
 - Gases,
 - Flammable Liquids,
 - Flammable Solids,
 - Oxidizers,
 - Organic Peroxides,
 - Poisons,
 - Corrosives
 - Miscellaneous
6. Specific chemical information including labels and safety data sheets shall be available for the following:
 - WD40 Aerosol,
 - CITGO No. 2 Diesel Fuel, Low Sulfur,
 - NAPA® Premium HD SAE 30 Motor Oil, &
 - Industrial Purple Cleaner & Degreaser Concentrate
7. Use of engineering controls, appropriate work practices and protective measures to be utilized to prevent exposure;
8. How to address exposure incidents and emergencies;
9. Location and availability of SDS, and how to read and understand SDSs;
10. Details of the hazard communication program including the use, handling and storage of Hazardous Materials;
11. Danger of confined and enclosed spaces;
12. Proper PPE to be used; and
13. Explanation of the labeling system.

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10.0 RECORDKEEPING

Peak NDT Solutions will maintain all records pertaining to this program including:

1. Employee Training Records: Duration of employment plus three (3) years;
2. Job Safety Analysis Reports (JSA's): Not less than three (3) years;
3. Safety Meeting Records: Not less than three (3) years;
4. Safety Data Sheets (SDS) for current chemicals in use; and
5. Injury Reports: Not less than fifteen (15) years.

REVISION INFORMATION

This is applicable to changes made to the current version of the preceding document.

Revision Number	Description