

# CHAPTER 1 – HAZARDS COMMUNICATIONS

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## 1.1 Introduction

OSHA has determined the construction industry to have high hazard' risk. Subsequently, employers like JA Rosa must implement and maintain a written Health and Safety Program (HASP) and a copy must be maintained at each workplace or at a central worksite if the employer has non-fixed worksites. This program establishes minimum job-site safety requirements for on-site personnel and is developed in accordance with 29CFR1926 and 29CFR1910.1200. Additional regulations applicable to procedures outlined in this plan may include other elements from 29 Code of Federal Regulations:

- Responsibility
- Compliance
- Communication
- Hazard Assessment
- Accident/Exposure Investigation
- Hazard Correction
- Training and Instruction
- Recordkeeping

This program has been prepared for use by J.A. Rosa Construction LLC for its employees, contractors, and associated engineers. This program must be maintained and reviewed by JA Rosa and the Responsible Safety Officer periodically (minimum annually) to be effective.

## 1.2 Health and Safety Program Responsibility

The Health and Safety Program (HASP) administrator, also known as the Responsible Safety Officer – “RSO” is the Program Administrator, and has the authority and responsibility for implementing the provisions of this program for J.A. Rosa Construction.

All managers and supervisors are responsible for implementing and maintaining the HASP in their work locations and for answering worker questions about the plan. A copy of this plan must be available from each manager and supervisor.

## 1.3 Compliance

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe work environment. Our system of ensuring that all workers comply with the rules and maintain a safe work environment includes:

- Informing workers of the provisions of our HASP.
- Evaluating the safety performance of all workers.
- Recognizing employees who perform safe work practices.
- Providing training to workers whose safety performance is deficient; and
- Disciplining workers for failure to comply with safe work practices.

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable should consist of one or more of the following:

- New worker orientation includes a discussion of safety and health policies and procedures.
- Review of our Health & Safety Program.
- On-site workplace safety training.
- Regularly scheduled safety meetings.
- Effective communication of safety concerns.
- A system for workers to anonymously report workplace hazards.
- Communicates with and instructs employees orally about general safe work practices and with respect to hazards unique to each employee's job assignment.

### 1.4 Hazard Assessment

Periodic inspections to identify and evaluate workplace hazards shall be performed by the following competent person(s) in the following areas of our workplace:

Competent Observer	Area

Periodic inspections and reviews are performed or when the following circumstances occur:

- When we initially established our HAS Program.
- When new substances, processes, procedures, or equipment which present potential new hazards are introduced into our workplace.
- When new, previously unidentified hazards are recognized.
- When occupational injuries and illnesses occur; and
- Whenever workplace conditions warrant.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist and any other effective methods to identify and evaluate workplace hazards.

## 1.5 Accident / Exposure Investigations

Procedures for investigating workplace accidents and hazardous substance exposures include:

- Visiting the accident scene as soon as possible.
- Interviewing injured workers and witnesses.
- Examining the workplace for factors associated with the accident/exposure.
- Determining the cause of the accident/exposure.
- Taking corrective action to prevent the accident from reoccurring; and

## 1.6 Accident / Exposure Report

Record the following information:

Date & Time of Accident:

Location: (provide as much detail as possible)

Employees Involved: (name, phone)

Witnesses: (name, phone, last four of SS# date hired)

Equipment in use:

Tasks being performed during accident.

Accident Description: (provide as much detail as possible)

Injuries sustained:

Loss of limb, eye, consciousness hospitalization:

Are injuries OSHA Reportable?

Property Damaged:

Preventive Action Recommendations:

Corrective Actions Taken:

Manager Responsible:

Date Completed:

## 1.7 Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers need to correct the hazardous condition shall be provided with the necessary protection; and

- All such actions taken and dates they are completed shall be documented on the appropriate forms.

## 1.8 Training and Instruction

OSHA standards require employers to provide employees with safety training. All Rosa employees will receive safety training that is applicable to their job functions. Employees will receive new employee safety training upon hire and refresher safety training throughout their employment.

Training and instruction shall be provided as follows:

- When the HASP is first established.
- To all new workers.
- To all workers given new job assignments for which training has not been previously provided.
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard.
- Whenever the employer is made aware of a new or previously unrecognized hazard.

## 1.9 Recordkeeping

Our establishment is on a designated high hazard industry list. We have taken the following steps to implement and maintain our HASP:

1. Records of hazard assessment inspections, including the person(s) or persons conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form; and
2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on a worker training and instruction form. We also include the records relating to worker training provided by a construction industry occupational safety and health program approved by OSHA.

Inspection records and training documentation will be maintained according to the following checked schedule:

- For three years, except for training records of employees who have worked for less than one year which are provided to the worker upon termination of employment; or
- Since we have less than ten workers, including managers and supervisors, we maintain inspection records only until the hazard is corrected and only maintain a log of instructions to workers with respect to worker job assignments when they are first hired or assigned new duties.

### 1.10 List of Training Subjects

We may train our workers about any of the following training subjects:

	Superintendent	Foreman	Field Employees
Employee Safety Responsibilities	Z	Z	Z
Accident / Near Miss Reporting Guidelines	Z	Z	Z
Ergonomic Hazards	Z	Z	Z
Blood Borne Pathogens	Z	Z	Z
Disciplinary Policy	Z	Z	Z
Personal Protective Equipment	Z	Z	Z
Fall Protection	Z	Z	Z
Excavation Safety	Z	Z	Z
Hazard Communication	Z	Z	Z
Confined Spaces	Z	Z	Z
Ladder Safety Training	Z	Z	Z
Scaffold Awareness	Z	Z	Z
Electrical Safety	Z	Z	Z
Material Handling & Safe Lifting Procedures	Z	Z	Z
Hand and Power Tools	Z	Z	Z
Lock-out/tag-out procedures	Z	Z	Z
Material Storage	Z	Z	Z
Fire Prevention & Protection	Z	Z	Z
Defensive Driver Training			Z
Forklift Training			Z
HAZWOPER			

## Hazard Assessment and Correction Record

Date of Inspection: \_\_\_\_\_ Person Conducting Inspection: \_\_\_\_\_

Unsafe Condition or Work Practice:

Corrective Action Taken:

### 1.11 SAFETY DATA SHEETS (SDS)

The SDS is divided into SIXTEEN sections:

1. Identification of the Substance
  2. Hazards Identification
  3. Composition/Information on Ingredients Substance
  4. First Aid Measures
  5. Firefighting Measures
  6. Accidental Release Measures
  7. Handling and Storage
  8. Exposure Controls/Personal Protection.
  9. Physical and Chemical Properties
- Plus SEVEN More

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.

Sections 1 through 8 contain general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures (e.g., firefighting). This information should be helpful to those that need to get the information quickly.

Sections 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.

All our SDSs can be viewed and printed from our on-line portal, or the SDS book kept on the job site. Employees are trained annually and the training is reinforced daily.

### 1.12 Labels

Product labels and secondary containers must have labels designed by the GHS. These labels must contain the following:

Chemical Name,  
Signal Word,  
Pictogram(s),  
Hazard Statement,  
Precautionary  
Statement, and  
Manufacturer

**EPICHLOROHYDRIN** <sup>1</sup>

UN No. 2023  
CAS No. 106-89-8


<sup>2</sup> **DANGER**

<sup>4</sup> Flammable liquid and vapor. Toxic if swallowed. Toxic in contact with skin. Causes severe skin burns and eye damage. May cause an allergic skin reaction. May cause cancer.

<sup>5</sup> Do not breathe dust/fume/gas/mist/vapors/spray. Wear protective gloves/protective clothing/eye protection.

Fill Weight: 18.52 lbs.      Lot Number: A0323111323  
Gross Weight: 20 lbs      Fill Date: 1/15/2012  
Expiration Date: 1/15/2018

<sup>6</sup> JACKSON CHEMICAL COMPANY - City of Industry, Los Angeles, California, USA (800)-444-456-8989



## 1.13 Hazard Assessment

JA Rosa Construction uses Job Safety Analysis to identify hazards associated with job tasks. To aid in the review process, the JSA lists the job steps, the hazards associated with those steps, and what is necessary to mitigate those hazards. The employees play a key role in helping identify job steps and hazards. Observing an employee performing the job, or “walking through” the operation step by step may give additional insight into potential hazards. Here are the components of each of the three parts of a Job Safety Analysis:

**SEQUENCE OF BASIC JOB STEPS:** Examining a specific job by breaking it down into a series of steps or tasks will enable you to discover potential hazards that may be encountered.

**POTENTIAL HAZARDS:** The purpose of the Job Safety Analysis is to identify ALL hazards – both those produced by environmental conditions and those connected with the job steps.

**RECOMMENDED ACTION OR PROCEDURE:** Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or mitigate the hazards that could lead to an accident, injury, or occupational illness.