

Title: Hazard Communication Program – S04
Date: May 2016
Approval: Safety Committee

1.0 Purpose

Mount Snow is committed to the education of chemical use in the workplace and to the prevention of chemical incidents that could result in injury and/or illness to any employees of Mount Snow.

Employees have both a need and a “right to know” about the hazards of any chemicals they work with during the course of their employment. Employees also need to know what protective measures are available to prevent chemical exposures and how to avoid adverse health effects.

This written Hazard Communication program is intended to comply with the provisions of 29 CFR 1910.1200. Copies of this program will be available on MSINFO or at the Human Resources office for review by any interested employees.

2.0 Scope and Applicability

This program is intended for those employees whose job requires them to use or work around hazardous chemicals.

Each department manager is responsible for ensuring that members of his/her staff are trained in hazard communication.

3.0 Reference

This Hazard Communication Program addresses the requirements of the Hazard Communication standard as described in 29 CFR 1900.1200.

4.0 Policy Statement

Mount Snow strives to provide a place of employment that is free from recognized hazards. This will be accomplished through proper training and education of its employees and by eliminating hazards as possible from the jobsite.

It is the policy of Mount Snow to require that an employee be protected from hazardous chemicals by providing appropriate training, having Safety Data Sheets readily accessible, and providing proper personal protective equipment.

Employees are expected to follow all safety rules and procedures as described in this program and all other safety programs of Mount Snow.

5.0 Specific Responsibilities

5.1 Program Manager

It shall be the responsibility of the Safety Committee and Risk Manager to maintain this program.

Any changes to this Hazard Communication Program shall be reviewed by the Safety Committee and approved by the Risk Manager.

5.2 Department Manager

Each department manager is responsible ensuring compliance with this written Hazard Communication Program, conducting respective training, and maintaining appropriate training records. Training documents and attendance sheets can be found on MSINFO on the Safety Page.

Any questions shall be directed to the Risk Manager.

5.3 Department Supervisors

Supervisors are responsible for ensuring staff have appropriate training prior to using or being exposed to any hazardous chemical.

Additionally, supervisors are responsible for monitoring compliance, conducting training, monitoring container labeling requirements, and enforcement of proper handling and use of hazardous chemicals.

5.4 Employees

Employees have the primary responsibility for referencing Safety Data Sheets prior to using any chemical which they are unfamiliar. Additionally, employees are responsible for using personal protective equipment, in accordance with the Safety Data Sheet, in the manner which they were trained. Finally, employees are responsible for reporting hazardous conditions or concerns to their supervisor or manager immediately, prior to performing any task which they are unfamiliar or uncomfortable with.

Upon completion of training on the Hazardous Communication program, it is the employees' responsibility to comply with all procedures and rules as described

herein.

6.0 General Provisions

6.1 Global Harmonization Standard

The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) includes criteria for the classification of health, physical and environmental hazards, as well as specifying what information should be included on labels of hazardous chemicals and safety data sheets.

6.2 Container Labeling

Container labels at Mount Snow should have a complete label. The labeling requirements depend on whether the container came from the manufacturer (Manufacturer's label) or whether the chemical was transferred from a bulk container (e.g. 55-gallon drum) to a more manageable container (secondary container). The supervisor for each work area will verify that all products have proper labeling in accordance with 29 CFR 1920.1200(f)

Labels on shipped containers should contain:

- 1) Product Identifier (name)
- 2) Signal word
- 3) Hazard statement(s);
- 4) Pictogram(s);
- 5) Precautionary statement(s); and,
- 6) Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

Secondary Container labeling or Workplace labeling should contain:

- All information as described in 1 through 5 under "labels on shipped containers" or;
- Product identifier (name) and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical [1910.1200(f)(6)(ii)].
- Furthermore, all workplace labels or other forms of warning must be legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift.
- No label is required if the chemicals are transferred from a labeled container to a portable container that is only intended for immediate use by the employee who performs the transfer and the chemical is completely used within that shift.

The supervisor for each work area will ensure that secondary containers, such as spray bottles, have complete labels. This can be accomplished by placing a copy of the original manufacturer's label on the secondary container, or (2) the information in the first bullet above should be placed on the container.

6.2.1 Haz Com Standard/GHS Pictograms

Pictograms are graphic symbols used to communicate specific information about the hazards of a chemical. On hazardous chemicals being shipped or transported from a manufacturer, importer or distributor, the required pictograms consist of a red square frame set at a point with a black hazard symbol on a white background, sufficiently wide to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label.

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

6.2.2 Warning Verbiage & Symbols

Signal Words

A signal word is a prompt that alerts users about the degree or level of hazard of the product. There are only two signal words used:

“Danger” – is used for high risk hazards

“Warning” – is used for less severe hazards

Hazard Statements

Describe the nature of the hazard(s) of a chemical, including where appropriate, the degree of hazard. Example: “Causes damage to kidneys through prolonged or repeated exposure.”

Precautionary Statements

Describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statement: prevention, response, storage, and disposal. Example: “Do not breathe dust/fume/gas/mist. Get medical advice if you feel unwell. Dispose of contents in accordance with local/regional/national and international regulations” or “keep away from heat.”

6.2.3 Example Secondary Container Label – Putting it all together!

PRODUCT IDENTIFIER
Should match the product identifier used on the Safety Data Sheets.

SIGNAL WORD
Indicates the relative level of the hazard's severity. "Danger" and "Warning" are the GHS signal words.

PICTOGRAMS
Graphics intended to convey specific hazard information.

Acetone
Danger!
Highly flammable liquid vapor.
Causes severe eye irritation.

Keep away from heat, sparks and flame—No smoking. Take precautionary measures against static discharge. Keep from direct sunlight. Keep container closed when not in use. Store in a cool/low temperature, well-ventilated place away from heat and ignition sources. Use only in a well-ventilated area. Avoid contact with eyes, skin and clothing. Wear appropriate personal protective equipment, avoid direct contact.

IF CONTACT WITH EYES: Flush eyes with water for at least 15 minutes while holding eyelids open.
In case of fire, use water spray, fog or mist. Dry chemicals. Halon. Powder, foam or CO2.
See Safety Data Sheet for further details regarding safe use of this product.
ABC Company, Main Street, Anytown, CA 00000 Tel: 012.345.6789

HAZARD STATEMENTS
A phrase assigned to a hazard class and category that describes the nature of the product hazards.

PRECAUTIONARY STATEMENTS
Describes recommended measures to minimize or prevent adverse effects resulting from exposure.

SUPPLIER IDENTIFICATION
The Supplier Identification is the name, address and telephone number of the manufacturer or supplier.

6.3 Safety Data Sheets (SDS)

Copies of SDS's for all hazardous chemicals to which employees at Mount Snow may be exposed will be kept in each work area or available electronically. Employees are encouraged to read SDS's for the chemicals they use. SDS's will be available to all employees during all shifts. If an SDS is missing, or if a new product arrives without an SDS, immediately inform your supervisor. The supervisor of each work area must ensure that the SDS binder or electronic version is maintained, up-to-date, and readily available for reference.

Safety Data Sheets shall be retained for the duration of chemical use plus 30 years. SDS's for chemicals no longer in use shall be filed with the Risk Manager.

6.3.1 Hazardous Chemicals List

The supervisor for each work area must compile a list of all the chemicals and products routinely used in his or her work area. This list is kept in the front of the SDS binder for the respective work area. Each chemical entry on the inventory list has a corresponding SDS available which provides specific information regarding that chemical. This list will be updated annually to remove chemicals that are no longer in use in the work area.

6.3.2 Safety Data Sheet Overview

The Safety Data Sheet is provided by the manufacturer, importer, or distributor. It provides a catalog of information relating to the chemical and is divided into a standard 16 section format. Each section of the SDS provides critical information to the end user. The SDS should be the first source of information regarding a chemical used in the workplace.

Section 1 – Identification identifies the chemical on the SDS as well as the recommended uses. It also provides the essential contact information of the supplier.

Section 2 – Hazard(s) Identification includes the hazards of the chemical and the appropriate warning information associated with those hazards.

Section 3 – Composition/Information on ingredients 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.

Section 4 – First-Aid Measures describe the initial care that should be given by untrained responders to an individual who has been exposed to the chemical.

Section 5 – Fire-Fighting Measures list recommendations for fighting a fire caused by the chemical, including suitable extinguishing techniques, equipment, and chemical hazards from fire.

Section 6 – Accidental Release Measures provide 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.

Section 7 – Handling and Storage provides guidance on the safe handling practices and conditions for safe storage of chemicals, including incompatibilities.

Section 8 – Exposure Controls/Personal Protection indicates the exposure limits, engineering controls, and personal protective equipment (PPE) measures that can be used to minimize worker exposure.

Section 9 – Physical and Chemical Properties identify physical and chemical properties associated with the substance or mixture.

Section 10 – Stability and Reactivity describes the reactivity hazards of the chemical and the chemical stability information. This section is broken into 3 parts: reactivity, chemical stability, and other.

Section 11 – Toxicological Information identifies toxicological and health effects information or indicates that such data are not available. This includes routes of exposure, related symptoms, acute and chronic effects, and numerical measures of toxicity.

Section 12 – Ecological Information provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment.

Section 13 – Disposal Considerations provide 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.

Section 14 – Transport Information includes guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea.

Section 15 – Regulatory Information identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS.

Section 16 – Other Information 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 change.

7.0 Employee Information and Training

Each new employee will receive information and training by his or her supervisor on the following:

- Chemicals present at Mount Snow that they will utilize for their assigned tasks
- Location and availability of our written hazard communication program as well as the location of SDS's for the employees' respective workplace.
- How to read labels and review safety data sheets to obtain appropriate information
- How to reduce or prevent exposure to these hazardous chemicals by using engineering controls, work practices and personal protective equipment (PPE).
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- Location, use and limitations of pertinent personal protective equipment.
- Location and use of first aid equipment.
- Proper emergency reporting procedures
 - Reference Emergency Reporting SOG.

7.1 Training Process

Supervisors are responsible for conducting job specific training on chemicals used by their employees *before exposure to these products*. Training shall be repeated whenever a new chemical or a new hazard is introduced in the work area.

Employee training records shall be maintained for the duration of employment.

7.2 Hazardous Non-Routine Tasks

Occasionally, a Mount Snow employee may be asked to perform a task that is not part of their normal job. Before taking on a new task, the affected employee will be given information by their supervisor about any hazardous chemicals that might be used during the activity.

This information will include:

- Specific chemical hazards;
- Protective measures employees can take; and
- Measures Mount Snow has taken to reduce the hazards, which might include ventilation, personal protective equipment, use of the buddy system, and emergency procedures.

7.3 Informing Contractors

Mount Snow will assist contractors with the following information:

- Hazardous chemicals to which they may be exposed while working at Mount Snow and the procedure for obtaining SDS's

The contractor will be responsible for training their employees in accordance with 29 CFR 1910.1200 and for obtaining, providing, and storing SDS's for the chemicals they use while performing work on Mount Snow property.

8.0 Audit and Review

This plan shall be reviewed by the Risk Manager and Safety Committee on an annual basis. It will be determined if any additional practices, procedures, or training needs to be implemented. Staff shall be notified and trained, as necessary, regarding revisions to this program.

9.0 Personnel Action

9.1 Enforcement

Constant awareness of and respect for chemicals in the workplace, and compliance with all safety rules, are considered conditions of employment. The team leader, supervisor, manager, director or Risk Manager, or their designee, reserve the right to issue disciplinary warnings to staff, up to and including termination, for failure to follow the guidelines of this program.

9.2 Discipline

As a condition of employment, all Mount Snow employees are required to actively participate in safety programs and follow established health and safety-related policies, procedures, guidelines, instructions, and/or rules. Disciplinary action, in some instances up to and including dismissal, may be taken in cases where it is determined that disregard for safety and health has occurred.

