

Hazard Communication Program

Nanogate North America

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SECTION 1: Introduction

The management of Nanogate North America is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules. Under this program employees are informed of the contents of the OSHA Hazard Communications Standard ([29 CFR 1910.1200](#)), the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals. These chemical hazards may be physical or health-related. This written hazard communication plan is available at the following location for review by all employees: [Nanogate training web page](#).

SECTION 2: Identifying Hazardous Chemicals

A list that identifies all hazardous chemicals with a potential for employee exposure is located in the front of the SDS books. SDS are located on the Plex system under shop floor page. Detailed information about the physical, health, and other hazards of each chemical is included in a Safety Data Sheet (SDS); the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet.

SECTION 3: Identifying Containers of Hazardous Chemicals

The labeling system to be used by Nanogate North America will follow the requirements in the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements. All hazardous chemical containers used at this workplace will have:

1. The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party
2. A label with the appropriate label elements just described
3. Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the chemical hazards.



Example Label

The shipping/warehouse supervisor will ensure that all containers are appropriately labeled. Workplace labels must be legible and in English.

SECTION 4: Keeping Safety Data Sheets

The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a specified format. The distributor or supplier of the chemical is required to provide this SDS to the purchaser.

SDS sheets are obtained from the manufacturers/suppliers for all chemicals and materials prior to their use at this facility. Any employee receiving an SDS shall forward it to the EHS Department, to insure that it is properly entered and maintained for access and communication with affected employees.

SDS's are readily available to all employees during their work shifts. Employees can review SDS for all hazardous chemicals used at this workplace. SDS's are available on the Plex system under the shop floor page.

The SDS's are updated and managed by the EH&S Department. If a SDS is not immediately available for a hazardous chemical, employees can obtain the required information by calling the EH&S Department at 419-521-0367.

Note: Obsolete chemical SDS's are to be kept for 30 years in an obsolete SDS file. If a revised SDS is provided, but the chemical formulation has not changed, then the old SDS can be discarded ([29 CFR 1910.1020 – Access to employee exposure and medical records](#)).

SECTION 5: Training Employees about Chemical Hazards

Before they start their jobs or are exposed to new hazardous chemicals, employees must attend a hazard communication training that covers the following topics:

- An overview of the requirements in OSHA's Hazard Communication Standard.
- Hazardous chemicals present in their workplace.
- Any operations in their work area where hazardous chemicals are used.
- The location of the written hazard communication plan and where it may be reviewed.
- How to understand and use the information on labels and in Safety Data Sheets.
- Physical and health hazards of the chemicals in their work areas.
- Methods used to detect the presence or release of hazardous chemicals in the work area.
- Steps we have taken to prevent or reduce exposure to these chemicals.
- How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and personal protective equipment.
- An explanation of any special labeling present in the workplace.
 - What are pictograms (see Figure 1 at the end of this program)?
 - What are the signal words?
 - What are the hazard statements?
 - What are the precautionary statements?
- Emergency procedures to follow if an employee is exposed to these chemicals.
- HMIS label PPE Categories.

The EH&S Department is responsible to ensure that employees receive this training. After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to our hazard communication plan.

Prior to introducing a new chemical hazard into any department, each employee in that department will be given information and training as outlined above for the new chemical hazard.

SECTION 6: Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisors will inform them about the chemicals' hazards. Their supervisors also will inform them about how to control exposure and what to do in an emergency. The employer will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment all additional training as required.

Examples of special tasks that may expose employees to hazardous chemicals include the following: (No non-routine tasks are known to exist at the time of preparation of this program.)










SECTION 7: Informing Contractors and Other Employers about Our Hazardous Chemicals

If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site) It is the responsibility of the Maintenance manager to provide contractors and their employees with the following information:

- The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

The Maintenance Manager will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace.

Figure 1: HCS Pictograms and Hazards

<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>Corrosive</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)