HAZARD COMMUNICATION PROGRAM

The Occupational Safety and Health Administration (OSHA), established a standard known as the Hazard Communication Standard (HCS), which is based on a simple concept - that employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working.

The Hazard Communication Standard can be found in the Code of Federal Regulations at ' 1910.1200. A copy of the standard is provided in the hard copy of the Loss Prevention Manual on property.

To better understand the terminology in this section, please review the following definitions:

1) **Chemical -** means any element, chemical compound or mixture of elements and/or compounds.

2) **Container -** means any bag, bottle, box, can, cylinder, etc. that contains a hazardous chemical.

3) **Exposure or Exposed -** means that an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential exposure. ASubjected@ in terms of health hazards includes any route of entry, e.g. inhalation, ingestion, skin contact or absorption.

4) **Hazardous Chemical -** means any chemical that is a physical hazard or a health hazard.

5) **Label -** means any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

6) **Material Safety Data Sheets (MSDS) -** means written or printed material concerning a hazardous chemical which is prepared for the purpose of informing what a material=s components are, its dangers, and how to work with it safely.

The OSHA Hazard Communication Standard requires that all chemicals used in Island Hospitality managed hotels be evaluated for possible physical or health hazards. Furthermore, the standard requires that all information relating to the chemicals and hazards be made available at all times to all employees. The standard covers anyone who comes in contact with hazardous chemicals while at

the workplace. All employees must be informed about the chemicals they will be working with and how to protect themselves from possible hazards.

The HCS refers to specific topics to include:

1) Hazardous chemical determination
2) Material safety data sheets
3) Labels and labeling
4) Written hazard communication program
5) Employee information and training

SECTION ONE - IDENTIFY HAZARDOUS CHEMICALS:

The standard requires a list of hazardous chemicals in the workplace as part of the written hazcom program. The list will serve as an inventory for everything for which a material safety data sheet must be maintained. The inventory will be maintained on an Island Hospitality Chemical Inventory form.

When conducting an inventory, keep in mind that the HCS covers chemicals in all physical forms, liquids, solids, gasses, vapors, etc. whether they are contained or not. Once all of the hazardous chemicals have been identified, you must make sure that there are corresponding material safety data sheets on property.

SECTION TWO - MATERIAL SAFETY DATA SHEETS (MSDS):

Chemical manufacturers and importers are required to obtain or develop an MSDS for each hazardous chemical they produce or import. Employers must have a MSDS on property for each hazardous chemical they use.

The MSDS must be in English and contain information such as the physical and chemical properties, physical and health hazards, routes of exposure, precautions for safe handling and use, emergency and first aid procedures and control measures.

If a hazardous chemical is purchased at a store and an MSDS is not available, you are still responsible for obtaining one. Normally, on the back of the container on the label, there will be a telephone number from which you can order an MSDS. Many times the MSDS can be faxed.

The MSDS for ALL hazardous chemicals must be available to all employees at all times.

SECTION THREE - LABELS AND LABELING:

Containers of hazardous chemicals must be labeled, tagged, or marked with the identity of the material and appropriate hazard warnings. The labels must be in English; however, information may also be printed in other languages. The labels are required to identify the chemical, list appropriate hazard warnings, and list the name and address of the manufacturer, importer, or other responsible party.

All chemical spray bottles must be properly labeled and buckets containing chemical solutions should have a label identifying the chemical being used or stored in that container.

SECTION FOUR - WRITTEN HAZCOM PROGRAM:

All Island Hospitality managed properties, regardless of brand, are required to formulate and implement a written hazard communication program. The HAZCOM program will cover the following topics:

1) Hotel HAZCOM compliance officer=s duties
2) Chemical inventory
3) Purchasing procedures
4) MSDS information
5) Container labeling procedures
6) Employee training schedules and methods
7) Non routine hazards
8) Informing outside contractors

THE WRITTEN HAZCOM PROGRAM SHOULD BE ACCESSIBLE TO ALL EMPLOYEES ALL OF THE TIME.

SECTION FIVE - EMPLOYEE INFORMATION AND TRAINING:

According to the HCS, each employee who may be Aexposed@ to hazardous chemicals when working, must be provided information and trained PRIOR to initial assignment to work with a hazardous chemical, and whenever the hazard changes. Employees will have at their disposal information on possible chemical related hazards through labels and material safety data sheets; however, they must be trained on how to read and understand such information.

1) INTRODUCTION:

Purpose: To inform employees of the Hazard Communication Program (HAZCOM) in effect at their hotel. The program includes the following:

a) The hotel hazard communication compliance officer=s duties.
b) Chemical inventory.
c) Purchasing procedures.
d) Material safety data sheets (MSDS) information.
e) Container labeling procedures.
f) Employee training schedules and methods.
g) Non-routine hazards.
h) Informing outside contractors.

The name of the compliance officer and general contents of this program should be posted on the employee bulletin board at the beginning of the year or whenever there are changes that effect the program. In addition, the employees may see this written program at any time upon request.

2) HOTEL COMPLIANCE OFFICER:

The compliance officer for this hotel is (insert name here). All HAZCOM program activities will be coordinated through the compliance officer and no changes will be made to the program or procedures without the compliance officer=s approval. Any employee who has questions or wishes additional information about the HAZCOM program should refer their questions to the compliance officer.

The compliance officer will review the MSDS=s for chemical hazards and ensure that the necessary safety information is included in all employee training and that it is presented in a manner the employees will understand. The compliance officer should keep the program updated and obtain new MSDS=s as chemicals are added to the program. He/she should make sure employees are kept informed of all safety and health information regarding use of chemicals at the hotel. The compliance officer should have a master file of all chemicals and MSDS=s used at the hotel. These master lists should be made available to any employee who wishes to inspect them.

At least twice a year, the compliance officer should review, with the property safety committee, the HAZCOM program to determine if changes or improvements are necessary. Any employee may make suggestions to the compliance officer at any time for improving the HAZCOM program. The compliance officer should ensure that all changes to the program are dated and the changes are disseminated to the employees. He/she should also keep a master copy showing the original program along with the changes and dates of the changes. It is part of the compliance officer=s duties to ensure the HAZCOM program does not become static, but instead is constantly changing to meet the needs of the employees.

2) CHEMICAL INVENTORY

The department heads should be responsible for suppling the compliance officer with an inventory of all chemicals used in their departments as well as the MSDS from the vendor. The information should be supplied on the Island Hospitality Chemical Inventory Form (included with this program) along with the other requested information. All chemicals used in the department must be listed. It will be the compliance officer=s responsibility to determine if it is hazardous as defined by law. It will also be the compliance officer=s responsibility to keep the chemical inventory current and make additions or deletions to the list as needed. No new chemicals can be used until the

compliance officer has been given the name of the chemical and the MSDS, and not before the employees using the chemical have been trained. The department heads should be responsible for informing the compliance officer when chemicals are removed permanently from the workplace. The chemical list will be posted in each department in a conspicuous manner so the employees can review them at anytime and during all work shifts.

3) PURCHASING PROCEDURES:

The hotel should require that all vendors for chemicals supply the hotel with:

a) A MSDS for each chemical.
b) The containers having the required identification and warning labels.

Any supplier or vendor who has not provided this information should be contacted and asked to provide it or other necessary documentation showing the chemical=s contents. If the vendor can not or will not provide either, they should be dropped and another supplier, or a different chemical, should be used.

4) MATERIAL SAFETY DATA SHEETS (MSDS):

The compliance officer should be responsible for reviewing the MSDS=s to insure they are acceptable, and that the containers include the proper labeling based on the data in the MSDS. He/she should check the sheets before filing them to be sure that they contain at least the following information:

a) The label and information provided must be written in English.
b) It must include the identity of the chemical and its common names.
c) It must indicate if the chemical is hazardous.
d) Information must be provided on the physical and chemical characteristics of the hazardous chemical.
e) Known short and long term effects of the chemical and related health information.
f) Exposure limits.
g) Whether it is considered a cancer causing substance.
h) Precautionary measures.
I) Emergency and first aid procedures.
j) The identification of the organization preparing the sheet.

The number on the chemical inventory will be posted on the MSDS so the MSDS for any chemical can be easily matched up for review by employees. In other words, the employee can simply find the number and then go immediately to the MSDS for an explanation of that chemical.

If the employee does not understand the MSDS, the department manager, supervisor, or the compliance officer should explain it to the employee=s satisfaction or contact the supplier for additional information. If it is determined that a chemical is hazardous and the MSDS does not have the proper information on safety precautions, the supplier should be asked to remove the chemical from the property until the proper precautions are established or another chemical is found.

A master list of all MSDS=s should be kept by the compliance officer. This master list should be kept on the property for at least thirty (30) years. All employees will have the right to review the master list when requested.

5) CONTAINER LABELING:

The department manager working with the compliance officer should verify that all containers: Are clearly labeled as to the contents; provide all appropriate hazard warnings; and list the name and address of the manufacturer.

No labels should be removed or defaced unless they are immediately replaced with in-house labels. The label should include:

a) The name of the chemical and any synonyms.
b) A signal word such as CAUTION, DANGER, WARNING FLAMMABLE, etc.
c) A statement of the hazard and its severity.
d) Precautions and any personal protection equipment needed.
e) All first aid procedures.

Labels are not required for portable containers when: they are for immediate use; the chemical was transferred from a labeled container; and it is being used by the employee who made the transfer. The employee using the unlabeled container should return any unused portions back to the original labeled container immediately when they are finished using same. All unlabeled containers not being used should be disposed of immediately according to Island Hospitality policy.

6) EMPLOYEE TRAINING AND INFORMATION:

The compliance officer should post his/her name along with the general content of the program on the employee bulletin board each January or whenever a new compliance officer is selected, or the program content changes. The department manager or supervisor should ensure that all employees are aware of the program and it is available for their review. It will also be their responsibility to inform the employees of the location of the MSDS=s and the list of chemicals used by the department.

Employees who use hazardous chemicals as part of their regular duties or when there is a possibility they may be exposed during an emergency should be trained in the specific hazards associated with that chemical as well as the safety precautions to follow. There should be an ongoing program to identify all hazardous chemicals by the property safety committee. They should conduct regular inspections of the property in order to identify hazardous chemicals or employees using chemicals in an unsafe manner. All accidents involving chemicals should be reviewed by the safety committee to determine if there were previously unidentified hazards which caused or contributed to the accident. If new hazards are identified, corrective action should be immediately taken and additional training provided as needed.

The safety committee should also review the program at least twice a year to ensure it is providing the necessary protection for the employees.

The training for employees who use hazardous chemicals should consist of:

a) Physical and health hazards of the chemical.
b) Visual appearance of the chemical, when appropriate.
c) Odors associated with the chemical, when appropriate.
d) Protective measures that can be taken such as the following:
    1) work practices
    2) emergency procedures
    3) use of and availability of personal protective equipment
    4) explanation of the labeling system
    5) explanation of the MSDS=s
    6) how or who to contact to obtain additional information on the use of chemicals

The initial training on the use of hazardous chemicals should be done by the compliance officer who will explain the program content and the basic terms used in the MSDS=s. The specific work methods and detailed explanations on how to use the chemicals should be supplied by the department manager or supervisor. Employees who receive the HAZCOM training should sign a form to verify they attended the training and understand the hazards and precautions as described in the training. A copy of this form should be kept in each department by the department manager with copies sent to the personnel file and to the compliance officer who will maintain a master list of all training done.

7) NON-ROUTINE HAZARDS:

When an employee is transferred to another department or is assigned a job that is not considered part of their normal duties, the supervisor should check to be sure this employee will not be using a hazardous chemical unless properly trained. If they have not been trained in the use of a particular chemical, the employee should be given information about the chemicals following guidelines as mentioned above for training and information. It should be hotel policy that no employee will begin work until such training has been provided.

8) INFORMING OUTSIDE CONTRACTORS:

Since most work performed by outside contractors will be done in conjunction with the engineering department, the Chief Engineer or the Assistant Engineer should work with the contractor to develop procedures to inform them of any hazardous chemicals. This should be part of the pre-planning for the job. Each department manager should coordinate efforts with the engineering department to ensure that the contractor=s employees are given the information before work begins. The contractor=s project manager and the engineering department should review the work to determine of any special or unusual chemical hazards will develop or are present because of the work being performed. At the same time, a plan of action should be developed on how they will keep the contractor=s workers informed of the chemical hazards present at the hotel. At a minimum, they should be given the following information:

a) Where the chemical information is kept for the areas they will be working and who is the compliance officer for the hotel.
b) Where copies of the MSDS=s are kept.
c) Measures that have been taken to lessen the possibility of exposure.
d) Personal protective equipment available from the hotel and procedures to follow if they are exposed.

It should be the Chief Engineer or the Assistant Engineer=s duties to inform and discuss these procedures with contractors who perform work at the hotel on a regular basis. When the contractor assigns new employees to perform work related tasks, they should be informed of these procedures as part of the orientation and familiarization of the work to be performed.

ISLAND HOSPITALITY
CHEMICAL INVENTORY

Name of Hazardous Chemical	Vendor	MSDS On File	Area Used	Page

Name of Hazardous Chemical	Vendor	MSDS On File	Area Used	Page