

# UNCONTROLLED

## Hazard Communication

### 1.0 Purpose and Scope

The Hazard Communication Standard "Right to Know" 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. They also need to know what protective measures are available to prevent adverse effects from occurring. The Hazard Communication Standard covers chemicals in all physical forms - liquids, solids, gases, vapors, fumes and mists- whether they are "contained" or not. The hazardous nature of the chemical and the potential for exposure are the factors that determine whether a chemical is covered or not.

### 2.0 Definition

Hazardous Chemical means a substance possessing toxic, reactive, flammable, or explosive properties, which may be a physical or health hazard.

### 3.0 Labeling

3.1 In-plant containers of hazardous chemicals must be labeled, tagged, or marked with the identity of the material and appropriate hazard warnings. Chemical manufacturers, importers and distributors are required by law, and Waupaca Foundry, Inc.. to ensure that every container of hazardous chemicals they ship is appropriately labeled with such information and with the name and address of the producer or other responsible party.

3.2 If the material is subsequently transferred by the employer from a labeled container to another container, the employer is required to label the other container, unless it is being used only to transport the material, and it will be used immediately by the person removing it from the original container.

3.3 Labels can be obtained from the Safety or Environmental Departments, or from the stockroom (control # 72-90-128).

3.4 The primary information that can be obtained from OSHA required labeling is an identity for the material, and appropriate hazard warnings. Labels must be legible, and in English and prominently displayed on the container.

3.5 At Waupaca Foundry, Inc.. each department supervisor/foreman is responsible for ensuring the labeling of in-plant containers. At Waupaca Foundry, Inc. the Environmental Department is responsible for ensuring the labeling of any containers that are shipped from our company to another site.

3.6 The labeling system used by Waupaca Foundry, Inc. is "HMIS" (Hazardous Material Identification System); there is no alternative to this in place. Procedures used to review and update labels, and ensure compliance monitored by the Safety Department. Link to description - >

3.7 Employees of Waupaca Foundry, Inc. should not remove or deface any existing labels. If they find containers that are not properly labeled, they should contact their department supervisor, the Safety Department, or the Environmental Department. All in-plant containers of hazardous chemicals must always be labeled, including small containers of chemicals used at the work site.

### 4.0 Material Safety Data Sheets (MSDS)

4.1 Chemical manufacturers and importers are required to obtain and develop a MSDS for each hazardous chemical they produce or import. Distributors are responsible for ensuring that their customers are provided a copy of these MSDSs. Employers must have an MSDS for each

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hazardous chemical that they use. Employers may rely on the information received from their suppliers. The MSDS must be in English.

4.2 The MSDS will provide detailed information on each hazardous chemical, including its potential hazardous effects, its physical and chemical characteristics, and recommendations for appropriate protective measures. MSDS are readily available to all employees, while they are in their work areas during their work shift. Employees can contact their foreman for MSDS information, the safety department, Health Services, or they may access the database on the 24-hour accessible computer located in the following areas:

Health Services First Aid room computer, computer workstations located throughout the production floor & any office computer having Lotus Notes.

4.3 At Waupaca Foundry, Inc. the purchasing department is responsible for obtaining, and Bryant Esch, Environmental Engineer is responsible for maintaining the MSDS.

4.4 The master file of MSDS is maintained on the Intranet by the Corporate Safety Department.

4.5 If a MSDS is not received at the time of initial shipment of a product, the vendor should be contacted first, and then if it is still not received, Bryant Esch should be contacted. Requests for MSDS forms are logged in the Environmental department.

4.6 If a department wishes to keep a binder of MSDS related to the chemicals in their work area, they may do so by completing a MSDS request form and forward it to the Environmental Department.

4.7 A complete and up to date list of MSDS is maintained by the safety department on the Lotus Notes/WAUPACA FOUNDRY, INC Intranet system that is accessible to all employees, at all times.

In case of computer failure, employees have been instructed to call the emergency number on the chemical label, or call safety dept. employees, or use <http://hazard.com/msds/index.html> to gain information about the chemical. At Plant 5 (Tell City), in the event of computer failure, hard copies of the facility MSDS are maintained in the Plant Safety Department.

### **5.0 Employee Training**

5.1 Each new hire at Waupaca Foundry, Inc. receives Hazard Communication training prior to entering the plant, during their Safety Orientation. After entering the plant, the supervisor is then responsible to provide the employee with more information specific to the job they are doing, and the chemicals in their area.

5.2 Each employee who may be "exposed" to hazardous chemicals when working must be provided information and trained prior to initial assignment to work with a hazardous chemical, with a refresher annually, and whenever the hazard changes.

5.3 Training will also be provided when new chemicals, with new hazards are introduced, or when employees transfer into a new department with new chemicals or hazards. This information is given to the Safety department by the Environmental Dept. and the training is then provided to the affected employees.

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5.4 "Exposure or exposed" under the rule means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure."

5.5 Training will include discussion of the following:

5.5.1 The existence of the Hazard Communication Standard and the requirements of the standard.

5.5.2 The components of the hazard communication program at Waupaca Foundry, Inc..

5.5.3 How employees can obtain and use hazard information such as labels, and MSDS.

5.5.4 The location of the Hazardous Communication Program, the list of hazardous chemicals, and the required MSDS's.

5.5.5 Measures employees can take to protect themselves from hazards, including specific procedures, (e.g. the Respiratory protection program), which are in place to provide protection, and the use of Personal Protective Equipment (PPE) at Waupaca Foundry, Inc.

5.5.6 Methods and observations - such as visual appearance or smell that worker's can use to detect the presence of hazardous chemicals they may be exposed to.

5.5.7 Spill recognition and clean up, including contact of ERT.

5.6 New or Transferred employees will receive training at the time they enter the department from the supervisor. This training will include information regarding which chemicals are located in the department (site specific), the location of MSDS forms, where the employee should obtain replacement labels from, and the contents of any unlabeled pipes.

5.7 All employees are trained to request further information as needed from their supervisor, the Safety Department, or the Environmental Department prior to work that includes non-routine tasks, or chemical use & exposure.

### **6.0 Contractors**

Waupaca Foundry, Inc. provides a copy of our Hazard Communication program in its entirety to each contractor that works on our property. The program is reviewed with the contractor. Contracting companies that use hazardous chemicals are required to provide ThyssenKrupp with a copy of their Hazard Communication written program, and the location in which chemical MSDS can be obtained readily from the contracting company.

Contractors are asked to provide Waupaca Foundry, Inc. with a copy of any chemical MSDS that is being used on Waupaca Foundry, Inc. property and is not contained in our chemical inventory.

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Sample - MSDS Request Letter

Sample date

MSDS Coordinator  
Foseco, Inc.  
20200 Sheldon Road  
Brook Park, OH 44142

SUBJECT: Request for updated Material Safety Data Sheets for products supplied to Waupaca Foundry, Inc..

To whom it may concern,  
In our efforts to maintain our MSDS files as current as possible, Waupaca Foundry, Inc. requires the following Material Safety Data Sheets for products supplied to us by your company:

FERROGEN FLUX LF-10X  
FERRUX-APC  
RHEOTEC #204  
RHEOTEC # 204B

We appreciate your continuing support in aiding us with our environmental and safety needs. If you have any questions or comments, please feel free to contact me at 715-258-6611.

Sincerely,  
Bryant Esch  
Environmental Engineer

Sample letter - sent with MSDS for WAUPACA FOUNDRY, INC.W products

Sample date

Carisa Laager  
Straight River Engineering and Manufacturing  
501 Industrial Park Rd.  
Park Rapids, MN 56470

Dear Ms. Laager,  
In compliance with the Federal Hazard Communication Standard CFR 1910.1200, we are enclosing copies of Material Safety Data Sheets (MSDS) for the following products supplied by Waupaca Foundry, Inc. to your firm:

Gray Iron  
Ductile Iron

The products distributed by Waupaca Foundry, Inc. are not identified as hazardous substances; and in their usual physical form do not pose any health hazards. However, burning, welding, grinding, cutting, or similar operations may emit metallic dust and/or fumes. If you perform any of these various operations, the appropriate MSDS should be consulted for information relative to your specific circumstances.

Please see that the appropriate departments and/or people in your firm receive this information.

Sincerely,

Bryant Esch  
Environmental Engineer

Enclosures: MSDS