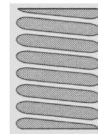


Duer/Carolina Coil Inc.
Work Instructions
W20808.Hazard Communication Program



Purpose: The objective of this program is to provide the information needed to understand the hazards of chemicals and materials used in our production and to ensure the safety and health of all our employees.

Scope: Applies to all hazardous materials used at Duer/Carolina Coil.

Remarks:

1. *The effectiveness of this procedure shall be evaluated annually as part of P40200.Internal Audit Process of clause 6.4 of ISO 9001-2008.*
2. Prior to August 27, 2007, Duer/Carolina Coil maintained Material Safety Data Sheets in binders on the shop floor. These documents were superseded on that date and are stored in the Building C mezzanine. These binders will not be discarded before August 27, 2037.
3. No revisions to the Material Safety Data Sheets in the Quality System website will be retained. No chemical used at Duer/Carolina Coil requires retention.

Definitions:

1. The Material Safety Data Sheet (MSDS) is a technical bulletin containing the following information:
 - a. The identity of the chemical
 - b. Physical and chemical characteristics of the chemical
 - c. Known acute and chronic health effects and related health information on the chemical
 - d. Exposure limits
 - e. Whether the chemical is a carcinogen
 - f. Precautionary measures to take when using the chemical
 - g. Emergency and first aid procedures
 - h. The name and address of the person who prepared the information.
2. Acute- effects that usually occur rapidly because of short-term exposures and are usually of short duration.
3. Chronic – effect that usually occurs because of long-term exposure and are of long duration.

Responsibilities:

1. The Manufacturing Manager is responsible for ensuring the execution of this instruction.
2. Each employee is responsible to understand this instruction and comply with it.
3. The Quality Coordinator is responsible for maintaining the Material Safety Data Sheets as part of the Quality System Web Site.

4. The Production Manager is responsible to ensure all employees handle hazardous waste in accordance with this instruction.

Task Description:

1. Ordering of new chemicals and substances into the plant:
 1. All new chemicals and other substances must be reviewed prior to ordering to ensure that the chemical does not pose a significant, new or unusual hazard. This includes new paint colors.
 2. With the original purchase request, forward a current MSDS to the Purchasing Manager. The Purchasing Manager must approve the chemical. This approval is signified by the Purchasing Manager signing the requisition and forwarding the MSDS to the Quality Coordinator. The review criteria include:
 1. The new chemical must not pose a new or different hazard than already exists.
 2. The new chemical must not increase potential emission rates of the facility above currently permitted.
 3. Any potential new training topics for employees using the new chemical.
 3. If the new chemical cannot be approved based on the above criteria and the requester feels the chemical is a sufficient business need, the Manufacturing Manager shall review the request and determine if it will be introduced. The Manufacturing Manager will therefore be responsible to investigate and ensure compliance with all regulatory, training, reporting and operational requirements.
2. Inventory of Hazardous Chemicals/Materials: The Quality Coordinator maintains an inventory of all hazardous chemicals in use and other potentially hazardous materials on the Quality System website.
 1. Employees may access this list and the associated MSDSs by following the hyperlinks.
 2. The list is specific to the Duer/Carolina Coil at 2375 Highway 101 South, Greer, SC.,
 3. The list includes the common or label name of the chemical or hazardous material and is arranged by department where the material is primarily used and maintained.
 4. The list will be updated based on operational requirements or the introduction of new chemicals or hazardous materials into the workplace.
3. Container Labeling:
 1. All receipt shipments of hazardous chemicals must be labeled with the identity of the chemical, appropriate hazard warning and the name and address of the manufacturer or other responsible party.
 2. Any chemical shipments received without proper labeling from the manufacturer or distributor will be controlled as non-conforming material and documented on F10031. Quality Feedback Report.
 3. Labels will indicate the name of the chemical and the physical and health hazards of the hazardous chemicals.

4. Portable containers holding a potentially hazardous chemical drawn by an employee from a labeled container and intended for the use of that employee only, during the course of his/her shift are not required to be labeled.
 5. Containers into which chemicals will be transferred and which multiple workers can be expected to use the chemical over a period longer than one shift will be labeled to show contents and an appropriate hazard warning. Any format label is acceptable. We provide and prefer standard format hazard labels with the multi-color diamond.
 6. Employees shall replace illegible labels.
4. Common raw materials machined, stamped or formed in the precision metalworking industry do not contain hazardous components in sufficient quantities to produce releases under normal conditions of use. However, machining, grinding and polishing of some raw materials and cutting tools are suspected of or have been shown to result in certain physical or health hazards if specific manufacturing procedures are not followed. In working with these materials, special precautions will include assuring that occupational exposure limits are determined and strictly followed. We will rely on the material safety data sheets supplied to us by our vendors to identify material requiring special handling procedures to protect the health and safety of our employees.
 5. Chemical manufacturers, importers, suppliers and vendors of hazardous material must send a MSDS prior to the first shipment and with the first shipment after updating a MSDS. The Purchasing Manager is responsible to obtain MSDS's for all potentially hazardous chemicals or material used in the facility. The preferred format for MSDSs is a .pdf file. If we receive a paper MSDS, it should be scanned as a .pdf for inclusion into the Quality System Website.
 6. The Quality Coordinator will ensure revised or updated Material Safety Data Sheets received from our suppliers replace the existing Material Safety Data Sheet covering that chemical or materials in the Quality System Website.
 7. The Purchasing Manager will ensure any new or significant information on any aspect of the chemical or material will be brought to the attention of the employees using the material.
 8. The employees have the right and are encouraged to review the Quality System Website for all Material Safety Data Sheets for hazardous chemicals or materials used in our facility.
 9. Employee Information and Training:
 1. All employees receive training on this procedure as part of their initial hiring process. This training is documented on F10035.Safety Orientation.
 2. The employee receives additional, job and material specific training during on the job training. This training is documented on the appropriate training checklist or by verbal review of work practices with the chemical.
 10. Hazards of Non-Routine Tasks: Employees may perform tasks of a non-routine nature that could expose them to certain chemical hazards. We will provide information on any non-routine chemical hazards to these employees prior to starting work. The supervisor responsible for the evolution and the employees involved are responsible to review MSDSs and other documentation to allow the workers to perform these tasks in the safest manner possible. Supervisors will

provide specific instructions and identifications of hazards associated with performing non-routine tasks.

11. Outside Contractors: Outside contractors, including temporary employment service personnel performing work on our premises, will have access to our Hazard Communication Program. We will advise, as necessary, Contractors of the presence of hazardous chemicals or materials in the workplace to which they may be exposed and personal protective equipment required. All outside contractor information and training will come from the primary liaison person for the work the contractor is performing.
12. Hazards of Chemicals in Unlabeled Pipes: Duer/Carolina Coil maintains at the operator level labels on all permanent hazardous piping in the plant. The only hazardous materials maintained in piping are:
 1. Natural Gas
 2. Quench Oil
13. Process for preparing Hazardous Waste for disposal.
 1. Locate a clean, intact drum. We maintain an inventory of drums in the shed outside Building D.
 2. Remove or spray paint over all labels on the drum. This avoids confusion as to the contents of the material.
 3. Obtain appropriate labels from the Purchasing Manager to clearly identify the waste. Typical waste categories include paint, non-regulated oil and absorbent and solid waste.
 4. Fill the drums completely with the waste. Clean off the top and attach to label.
 5. Put the drums in the shed outside Hot Wound.

Related Documents:

1. Material Safety Data Sheets
2. OSHA Standard 29 CFR 1910.1200
3. F10035.Safety Orientation
4. P40200.Internal Audit

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