

GTR ENGINEERING, LLC

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GTR SAFETY PLAN

GENERAL POLICY STATEMENT

THIS IS TO INFORM YOU THAT GTR ENGINEERING IS COMPLYING WITH THE OSHA HAZARD COMMUNICATION STANDARD, TITLE 20 CODE OF FEDERAL REGULATIONS 1910.1200, BY COMPILING A HAZARDOUS CHEMICALS LIST, BY USING MATERIAL SAFETY DATA SHEETS, BY ENSURING THAT CONTAINERS ARE LABELED, AND BY PROVIDING YOU WITH TRAINING.

THIS PROGRAM APPLIES TO ALL WORK OPERATIONS AT GTR WHERE YOU MAY BE EXPOSED TO HAZARDOUS SUBSTANCES UNDER NORMAL WORKING CONDITIONS OR DURING AN EMERGENCY SITUATION.

THE SAFETY MANAGER IS THE PROGRAM COORDINATOR WHO WILL REVIEW AND UPDATE THE PROGRAM AS NECESSARY.

UNDER THIS PROGRAM, YOU WILL BE INFORMED OF THE CONTENTS OF THE HAZARD COMMUNICATION STANDARD, THE HAZARDOUS PROPERTIES OF CHEMICALS WITH WHICH YOU WORK, SAFE HANDLING PROCEDURES, AND MEASURES TO TAKE FOR PROTECTION FROM THESE CHEMICALS. YOU WILL ALSO BE INFORMED OF THE HAZARDS ASSOCIATED WITH NONROUTINE TASKS YOU MAY BE ASKED TO PERFORM.

LIST OF HAZARDOUS CHEMICALS

IF NEEDED THE SAFETY MANAGER WILL MAKE A LIST OF ALL HAZARDOUS CHEMICALS AND RELATED WORK PRACTICES USED IN THE FACILITY AND WILL UPDATE THE LIST AS NECESSARY. IF THIS SHOULD EVER APPLY GTR'S LIST OF CHEMICALS WOULD IDENTIFY ALL OF THE CHEMICALS USED IN ITS WORK PROCESS AREAS. A SEPARATE LIST IS WOULD BE AVAILABLE FOR EACH WORK AREA AND WOULD BE POSTED THERE. EACH LIST WOULD ALSO IDENTIFY THE CORRESPONDING MSDS FOR EACH CHEMICAL. A MASTER LIST OF THESE CHEMICALS WILL BE MAINTAINED BY AND IS AVAILABLE FROM THE SAFETY MANAGER.

MATERIAL SAFETY DATA SHEETS (MSDS)

THE MSDS PROVIDE YOU WITH SPECIFIC INFORMATION ON THE CHEMICALS YOU USE. THE SAFETY MANAGER WILL MAINTAIN A BINDER WITH AN MSDS FOR EVERY SUBSTANCE ON THE LIST OF HAZARDOUS CHEMICALS. THE MSDS WILL BE A FULLY COMPLETED OSHA FORM 174 OR ITS EQUIVALENT. THE MSDS WILL BE MADE AVAILABLE TO YOU AT YOUR WORKSTATION DURING YOUR SHIFT.

THE SAFETY MANAGER IS RESPONSIBLE FOR ACQUIRING AND UPDATING THE MSDS. IF ADDITIONAL RESEARCH IS NECESSARY OR IF AN MSDS HAS NOT BEEN SUPPLIED WITH INITIAL SHIPMENT OF A CHEMICAL HE OR SHE MUST CONTACT THE MANUFACTURER. ALL NEW PROCUREMENTS FOR GTR MUST BE CLEARED BY THE SAFETY MANAGER. A MASTER LIST OF THE MSDS IS AVAILABLE FROM THE SAFETY MANAGER.

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LABELS AND OTHER FORMS OF WARNING

THE SAFETY MANAGER WILL ENSURE THAT ALL HAZARDOUS CHEMICALS ARE PROPERLY LABELED AND UPDATED AS NECESSARY. LABELS WILL LIST, AT LEAST, THE CHEMICAL IDENTITY OF THE CONTENTS, APPROPRIATE HAZARD WARNINGS, AND THE NAME AND ADDRESS OF THE MANUFACTURER, IMPORTER, OR OTHER RESPONSIBLE PARTY.

THE SAFETY MANAGER WILL REFER TO THE CORRESPONDING MSDS FOR EACH CHEMICAL TO VERIFY THAT THE LABELING IS CORRECT. CONTAINERS SHIPPED FROM GTR WILL BE CHECKED BY THE SHIPPING DEPARTMENT TO MAKE SURE THAT ALL CONTAINERS ARE PROPERLY LABELED.

IF THERE ARE A NUMBER OF STATIONARY CONTAINERS WITHIN A WORK AREA THAT HAVE SIMILAR CONTENTS AND HAZARDS, SIGNS WILL BE POSTED ON THEM TO CONVEY THE HAZARD INFORMATION. ON STATIONARY PROCESS EQUIPMENT, REGULAR PROCESS SHEETS, BATCH TICKETS, BLEND TICKETS, AND SIMILAR WRITTEN MATERIALS MAY BE SUBSTITUTED FOR CONTAINER LABELS WHEN THEY CARRY THE SAME INFORMATION AS THE LABELS. THE WRITTEN MATERIALS ARE AVAILABLE TO YOU DURING WORK HOURS.

IF YOU TRANSFER CHEMICALS FROM A LABELED CONTAINER TO A PORTABLE CONTAINER THAT IS INTENDED ONLY FOR YOUR IMMEDIATE USE, NO LABELS ARE REQUIRED ON THE PORTABLE CONTAINER. PIPES AND PIPING SYSTEMS ARE NOT LABELED BUT THEIR CONTENTS WILL BE DESCRIBED TO YOU.

NONROUTINE TASKS

WHEN YOU ARE REQUIRED TO PERFORM HAZARDOUS NONROUTINE TASKS, A SPECIAL TRAINING SESSION WILL BE CONDUCTED TO INFORM YOU ABOUT THE HAZARDOUS CHEMICALS TO WHICH YOU MIGHT BE EXPOSED WHILE PERFORMING THE NONROUTINE TASK AND THE PROPER PRECAUTIONS TO TAKE TO REDUCE OR AVOID THE RISK OF EXPOSURE.

TRAINING

EVERYONE WHO WORKS WITH OR IS POTENTIALLY EXPOSED TO HAZARDOUS CHEMICALS WILL RECEIVE INITIAL TRAINING ON THE HAZARD COMMUNICATION STANDARD AND THE SAFE USE OF THOSE HAZARDOUS CHEMICALS BY THE SAFETY MANAGER. WHENEVER A NEW HAZARD IS INTRODUCED, ADDITIONAL TRAINING WILL BE PROVIDED. REGULAR SAFETY MEETINGS WILL ALSO BE USED TO REVIEW THE INFORMATION PRESENTED IN THE INITIAL TRAINING. SUPERVISORY PERSONNEL WILL BE EXTENSIVELY TRAINED REGARDING HAZARDS AND APPROPRIATE PROTECTIVE MEASURES SO THAT THEY WILL BE AVAILABLE TO ANSWER QUESTIONS FROM EMPLOYEES AND PROVIDE DAILY MONITORING OF SAFE WORK PRACTICES.

THE TRAINING PROGRAM WILL EMPHASIZE THESE ITEMS:

1. SUMMARY OF THE STANDARD AND THIS WRITTEN PROGRAM.
2. CHEMICAL AND PHYSICAL PROPERTIES OF HAZARDOUS MATERIALS (FOR EXAMPLE, FLASH POINT, REACTIVITY) AND METHODS THAT CAN BE USED TO DETECT THE PRESENCE OR RELEASE OF CHEMICALS (INCLUDING CHEMICALS IN UNLABELED

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PIPES).

3. PHYSICAL HAZARDS OF CHEMICALS (POTENTIAL FOR FIRE, EXPLOSION, ETC.).

4. HEALTH HAZARDS, INCLUDING SIGNS AND SYMPTOMS OF EXPOSURE, ASSOCIATED WITH EXPOSURE TO CHEMICALS AND ANY MEDICAL CONDITION KNOWN TO BE AGGRAVATED BY EXPOSURE TO THE CHEMICAL.

5. PROCEDURES TO PROTECT AGAINST HAZARDS (PERSONAL PROTECTIVE EQUIPMENT THAT IS REQUIRED AND ITS PROPER USE AND MAINTENANCE; WORK PRACTICES OR METHODS TO ASSURE PROPER USE AND HANDLING OF CHEMICALS; AND PROCEDURES FOR EMERGENCY RESPONSE).

6. WORK PROCEDURES TO FOLLOW TO ASSURE PROTECTION WHEN CLEANING HAZARDOUS CHEMICAL SPILLS AND LEAKS.

7. WHERE MSDS ARE LOCATED, HOW TO READ AND INTERPRET THE INFORMATION ON BOTH LABELS AND MSDS AND HOW EMPLOYEES MAY OBTAIN ADDITIONAL HAZARD INFORMATION.

THE SAFETY MANAGER WILL REVIEW GTR'S EMPLOYEE TRAINING PROGRAM AND GIVE ADVICE REGARDING TRAINING AND RETRAINING NEEDS. RETRAINING IS REQUIRED WHEN THE HAZARD CHANGES OR WHEN A NEW HAZARD IS INTRODUCED INTO THE WORKPLACE, BUT IT WILL BE GTR POLICY TO PROVIDE TRAINING REGULARLY IN SAFETY MEETINGS TO ENSURE THE EFFECTIVENESS OF ITS TRAINING PROGRAM. AS PART OF THE ASSESSMENT OF THE TRAINING PROGRAM, THE SAFETY MANAGER WILL OBTAIN INPUT FROM YOU REGARDING TRAINING THAT YOU RECEIVE AND SUGGESTIONS FOR IMPROVING IT.

OUTSIDE CONTRACTORS

UPON NOTIFICATION OF THEIR PRESENCE OR POTENTIAL PRESENCE IN GTR'S WORKPLACE, THE SAFETY MANAGER WILL ADVISE OUTSIDE CONTRACTORS IN PERSON OF ANY CHEMICAL HAZARDS THAT MAY BE ENCOUNTERED IN THE NORMAL COURSE OF THEIR WORK ON GTR PREMISES, THE LABELING SYSTEM IN USE, THE PROTECTIVE MEASURES TO BE TAKEN, AND THE SAFE HANDLING PROCEDURES TO BE USED. IN ADDITION, THE SAFETY MANAGER WILL NOTIFY THESE INDIVIDUALS OF THE LOCATION AND AVAILABILITY OF MSDS. EACH CONTRACTOR BRINGING CHEMICALS ON SITE MUST PROVIDE GTR WITH THE APPROPRIATE HAZARD INFORMATION ON THESE SUBSTANCES, INCLUDING THE LABELS USED AND THE PRECAUTIONARY MEASURES TO BE TAKE IN WORKING WITH THESE CHEMICALS.

ADDITIONAL INFORMATION

ALL EMPLOYEES MAY OBTAIN FURTHER INFORMATION ON GTR'S WRITTEN PROGRAM, THE HAZARD COMMUNICATION STANDARD, APPLICABLE MSDS AND CHEMICAL INFORMATION LISTS FROM THE SAFETY MANAGER.

RECORDKEEPING

GTR IS REQUIRED TO KEEP RECORDS ON EVERY WORKPLACE INJURY AND TO RECORD ANY TIME YOU ARE UNABLE TO PERFORM YOUR FULL DUTIES BECAUSE OF A

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WORK-RELATED INJURY OR ILLNESS. GTR'S SAFETY MANAGER MAINTAINS THESE RECORDS. ANY TIME YOU INCUR A WORKPLACE INJURY, AN ACCIDENT FORM MUST BE SENT TO THE SAFETY MANAGER, NO MATTER HOW MINOR THE INJURY IS.

SIMILARLY, YOU MAY NOT BE EXCUSED FROM PERFORMING ANY OF YOUR REGULAR WORK DUTIES, UNLESS YOU HAVE FIRST OBTAINED A WORK RESTRICTION FORM. IF YOU ARE UNABLE TO PERFORM YOUR REGULAR WORK DUTIES, YOU MUST OBTAIN A WORK RESTRICTION FORM FROM THE SAFETY MANAGER.

IF YOUR WORK RESTRICTION FORM EXPIRES AND YOU ARE STILL UNABLE TO PERFORM YOUR REGULAR DUTIES, YOU MUST RETURN TO THE SAFETY MANAGER FOR A NEW WORK RESTRICTION FORM.

YOU WILL SEE A LISTING OF ALL OCCUPATIONAL INJURIES AND ILLNESSES FOR THE YEAR POSTED IN THE SAFETY LOG. THESE WILL NOT BE KEPT IN A GTR PERMANENT FILE.

POSTING

A POSTER DESCRIBING GTR'S AND YOUR RESPONSIBILITIES AND DUTIES UNDER OSHA IS DISPLAYED IN THE KITCHEN, ALONG WITH OTHER WORK-RELATED INFORMATIONAL POSTERS. IF YOU HAVE ANY QUESTIONS ABOUT THE INFORMATION FOUND ON THE POSTER OR NEED ASSISTANCE IN UNDERSTANDING, READING, OR HAVING THE POSTER TRANSLATED, CONTACT THE SAFETY MANAGER.