Purpose, Objective & Scope

- **Purpose**
  - This program outlines AirCorps Aviation policies, procedures and practices for complying with 29 CFR 1910.1200 Hazard Communication 2012 and MN Chapter 5206 Hazardous Substances (RTK) rule when using chemicals in the formulation, processing and storage of products with the expressed goal of protecting employees from physical or health injuries.
  - Our purpose is to educate our employees on workplace chemicals used in production and to recognize conditions that could cause physical or health injuries that may arise out of the use of those chemicals and to reinforce existing procedures, processes or policies on chemical use.
- **Objective:** This Program explains the provisions of federal and state standards and how company policy will be implemented. This program objective is to achieve zero physical or health injuries from chemical use through proper chemical handling.
- **Scope:** The MN RTK program applies across the workplace where handling, storage and use of hazardous chemicals exists.

Introduction

- This program provides the overall company's structure for complying with 29 CFR 1910.1200 Hazard Communication 2012 and the MN Right To Know Rule. The intent is to establish general guidelines that will prevent chemical exposure that can cause physical or health injuries when storing, handling, mixing, and pouring, operating or using equipment containing hazardous chemicals.
- The Company has and will continue to evaluate workplace chemicals that are used on company premises. This information is provided to our employees through orientation and annual refresher training. We use several chemicals in the rework and fabrication of aircraft for our customers. Hydraulic oil is used in the hydraulic presses. CO is emitted from some forklifts
- The Company trains employees in work areas where chemical hazards are used in our processes.
- The company periodically evaluates workplace chemicals that are ordered, received and used. The primary evaluation method used is an initial evaluation of chemicals by management.
- Chemical information is provided to our employees prior to operating equipment and/or exposure through detailed training on new procedures, processes, new job orientation, annual refresher training, etc.
- Bloodborne Pathogens and Hearing Conservation are addressed as separate programs.
- This program will use as a reference to Federal Hazard Communication and MN Hazardous Substances - MN RTK regulations.
- This comprehensive program will include the following elements:
  - Chemical Inventory

- Management Review
- Responsibilities
- Employee training
- SDS
- Hazardous Non-Routine Tasks
- Recordkeeping
- Container Labeling - GHS

Program Elements

- **Chemical Inventory**
  - A Chemical inventory includes a list of products and chemicals used by our Company. The annual inventory will use the "chemical index list" when conducting a physical audit of those chemicals to match chemicals on premise to the "list" and to identify chemicals found that are not on the "list" and require an SDS. A determination is then made to decide which products are hazardous using the SDS sheet.
  - The chemical index will have corresponding SDS sheets in the Safety Server file available online for review by all Company employees.
- **Management Review**
  - Management Review is a process to pre-identify unexpected or adverse chemical reactions to prevent physical or health injuries to employees and to maintain product quality. The process also includes reviewing regulatory compliance issues of chemicals. **This process is typically implemented when introducing "like chemical", new chemicals or samples into the facility for rework or fabrication purposes.**
  - The Management Review process also addresses the process of approving new chemicals, ordering (purchasing), updating the SDS and the finished product used.
  - Chemicals and the chemical byproduct evaluations will be reviewed for environmental reporting, storage compatibility, and physical and health hazards.
  - **SDS's are available at the online Safety File** for review by all employees that may come into contact with a chemical during their work shift using the **online Safety File**.
  - A missing SDS (not in the **online Safety File**) is to be reported by the discovering employee to their Manager. Safety Manager secures the SDS's.
  - The SDS will be reviewed and updated annually by the Safety Manager to ensure that all SDS are present for products on the premises or used in the workplace.
  - The MNRTK program can be found in the **online Safety File**. The Manager will make accessible to employees upon request.

Responsibilities

- **Safety Manager**
  - Approves the MN RTK Program.
  - Requires annual and subsequent employee MN RTK training, including initial work instructions.
  - Utilizes Management Review to evaluate chemicals and establish work procedures, if applicable.
  - Ensures budgetary allotments to support the MN RTK Program.
  - Delegates to the Manager the day-to-day implementation of the program.

- Upon need, establishes additional specific responsibilities and performance levels for management.
- Delegates to the Manager orientation of new employees of the chemical types used within production.
- Responds and makes available upon request to employees or their designated representative and OSHA Safety Investigator this written safety document or a product's SDS.
- Point of contact on safety questions and policies regarding MN RTK Program.
- Assigns MN RTK Program administrative responsibilities to the **Manager**.
- Main contact with outside contractors for chemicals brought into the facility.
- Informs Contractors of Company labeling used on containers.
- Informs Manager of chemicals that will have an adverse physical or health effect on Company employees.

- **Business Coordinator**
  - Arranges the annual MN RTK training sessions.
  - Custodian of MN RTK training records and the written program.
  - Develops, writes and updates MN RTK Program when needed.
  - Performs the administrative portion of the program to ensure that the program satisfies the company MN RTK requirements
- **Manager**
  - Understands the purpose and process of the MN RTK Program.
  - Overall, implements the MN RTK Program.
  - Keeps abreast of MN RTK regulatory changes.
  - Works with Safety Manager to ensure that SDS's are accessible to employees.
  - Requires employees to label secondary containers (if required) including totes, drums, and secondary containers according to label format requirements.
  - Apprises Safety Manager of any serious chemical safety concerns.
  - Upon need, establishes additional specific responsibilities and performance levels for employees.
  - Investigates serious accidents involving chemicals that caused a health and physical injury or incidents of over exposure.
  - Requires compliance in chemical use, handling, processing and storage according to Hazard Communication and MN RTK regulations and company policies.
  - Reviews chemicals used in the production process to control employee exposure.
  - Establishes procedures in coordination with Safety Manager on chemical handling.
  - Ensures employees are trained in chemical type and use, work instructions, etc. within production.
  - Ensures that proper labeling is on all containers.
  - Checks with vendor to clarify mismatched SDS and labels.
  - Coordinates the day-to-day program activities with the employees, where needed.
  - Randomly monitors workplace activities for compliance.
- **Purchasing**
  - Orders chemicals approved by the Manager
  - Reviews raw chemical inventory for current SDS.

    - Requests SDS from vendor, manufacturer, supplier, or outside SDS database for chemicals received.
    - Obtains SDS and updates chemical inventory list for current SDS. Forwards SDS to the Manager.
    - Maintains a master index list of all chemicals ordered.
    - Checks with vendor to clarify mismatched SDS and labels.
- **Shipping and Receiving**
    - Informs purchasing of conflict on labels and SDS manufacturer, product name, address.
    - Informs Purchasing and Manager of label and SDS discrepancy and holds chemical container (product) until approved by upper management.
    - Forwards the SDS found on receiving chemical container to Purchasing.
- **Employee**
    - Understands the purpose and process of the MN RTK Program.
    - Supports the company in program implementation.
    - Attends training on proper work procedures, chemical handling, and personal protective equipment usage in production, including new employee orientation.
    - Monitors other employees on proper work procedures and personal protective equipment usage compliance when handling chemicals.
    - Attends training on chemical handling and personal protective equipment usage for non-routine tasks.
    - Checks incoming containers for labels matching up with SDS for manufacturer, product name, legibility, damage, etc.
    - Follows the proper procedure for handling hazardous chemicals.
    - Ensures secondary containers (where required) have appropriate label. Ensures that the label is legible, font not too small, etc. Secondary containers used by one employee within a work shift need not be labeled.
    - Attends MN RTK training.
    - Uses personal protective equipment for chemicals that create a physical or health hazard to employees.
    - Randomly checks to see if new product SDS is available for chemicals.
    - Randomly reviews proper labeling in place for primary and secondary containers holding solutions in production.
    - Attends new employee training on location of SDS, MN RTK program highlights with employee responsibilities, work procedures and expectation.
    - Provides feedback to Manager for chemical process work procedure changes that will eliminate or further minimize chemical exposure to employee.
    - Attends MN RTK Annual safety training sessions.
    - Previews SDS that are applicable to the job.
    - Follows company training criteria on chemicals using work procedures.
    - Reviews the container label for warnings before use.
    - Reports all chemical related injuries and accidents to the Manager.

Employee Training

- The Company will train its employees on the MN RTK Program requirements and company policies in chemical handling. The training will provide the following information:
    - An overview of the MN RTK Program Requirements including employee's rights under the "Act".

- Identification of chemicals used in the work area.
- Location of the MN RTK Program and retrieval of SDS for review.
- The Manager is the alternate contact for product information if the Safety Manager is not available.
- Methods and observations that may be used to detect the presence (smell, eye irritation, coughing, vapor cloud and visual release) of a hazardous chemical in work area.
- Health and physical hazards of chemicals used in production. Provide information on known levels of chemical exposure through industrial hygiene testing, if completed.
- Steps the employees can take to protect themselves from exposure to hazardous chemicals such as work practices, emergency procedures, and personal protective equipment usage.
- Explanation of the SDS information to enable the employees to obtain and use the appropriate personal protective equipment.
- Read and understand GHS labeling information.
- Steps employees can take to improve the program and to be responsible for their actions in controlling exposure to chemicals.
- Contact the Manager for questions that arise outside of the training sessions.
- Review new chemicals with the Manager before use.
- Inform the Manager of missing SDS on the in the Online Safety File.
- **Employees receiving chemical containers (shipping/receiving, warehouse, storage) and are not typically exposed will be trained on chemical exposure spills, potential size of spills, type of work performed, and actions expected to take after a spill.**

Safety Data Sheets (SDS)

- The SDS is a document containing 16 required sections as part of the Global Harmonization System that was accepted in 2012 under the Federal Hazard Communication Standard. Each section describes the product and its chemical characteristics. The following identifies each SDS section heading:
  - **Section 1, Identification:** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; etc.
  - **Section 2, Hazard(s) identification:** includes all hazards regarding the chemical; required label elements.
  - **Section 3, Composition/information on ingredients:** includes information on chemical ingredients; trade secret claims.
  - **Section 4, First-aid measures:** Reaction after exposure to include important symptoms/effects, acute, delayed; required treatment.
  - **Section 5, Fire-fighting measures:** Identifies combustion byproducts, suitable extinguisher, chemical hazards from fire.
  - **Section 6, Accidental release measures:** identifies emergency procedures; protective equipment; proper methods of containment and cleanup.
  - **Section 7, Handling and storage:** lists precautions for safe handling and storage, including incompatibilities.
  - **Section 8, Exposure controls/personal protection:** lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

- **Section 9, Physical and chemical properties:** lists the chemical's characteristics.
- **Section 10, Stability and reactivity:** Identifies chemical stability and possibility of hazardous reactions.
- **Section 11,** Toxicological information: includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity, hazards, etc.
- **Section 12,** Ecological information*
- **Section 13,** Disposal considerations*
- **Section 14,** Transport information*
- **Section 15,** Regulatory information*
- **Section 16, Other information:** includes the date of preparation or last **revision.**

***Note: OSHA will not be enforcing Sections 12 through 15 since other Agencies regulate this information.**

- The Company uses an Online Safety File to maintain SDS. The Online Safety File can be accessed at any computer workstation.
- SDS's are available for review by all employees that may come in contact with the chemical during their work shift using the company's Online Safety File.
- A missing SDS is to be reported by discovering employee to their Manager. Purchasing secures the SDS. Management review will be instituted if it is an ingredient in production not vetted prior.
- An employee will be provided a copy of the SDS upon request when a container is handled or actively used.
- The SDS will be reviewed and updated annually by the Manager to ensure that all SDS are present for products on the premises or used in the workplace.
- The MN RTK program is located at the Online Safety File, accessible to the employees.

Hazardous Non-Routine Tasks

- Periodically, employees may be required to perform hazardous, non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by the Manager about hazards to which they may be exposed to during such an activity. The information will include:
  - Specific hazards of the chemical.
  - Protective safety measures which must be utilized.
  - Measures the Company has taken to minimize hazards, including ventilation, respirator usage, presence of another employee, and emergency procedures.

Record Keeping

- Training records are to be maintained for three years.
- Records will contain dates trained, employee's name, title, department, and instructor's qualifications.
- Training records are kept by the Safety Manager.

Container Labeling

- Original shipping containers (OSC) not having the required labeling information will be correctly labeled by the Manager or the employee.
- At a minimum, OSC labels must identify the hazardous substance, manufacturer, pictograms, signal words, precautionary statements, etc.

- An “immediate use" secondary container need not be labeled if under the control of one employee and the substance in the container will be used up within a work shift. An “immediate use” container must be labeled if more than one person uses the container or is used on another work shift. Secondary containers not classified as “immediate use” but contain a chemical require a label. Any employee first noticing a secondary container not labeled **is responsible to label the secondary container**.

Obtaining SDS - Vendor

- The chemical manufacturer is to provide a current, accurate, and complete SDS to the Company upon request on products purchased. The Safety Manager or Purchasing will be the point of contact with outside vendors for most products requiring SDS requests. Safety Manager will be responsible for securing SDS if purchased outside the normal process.
- Upon request, the Company’s upper management will provide the SDS to the OSHA representative.
- Outside Contractors
    - Aircorps Aviation will utilize the company’s “Outside Contractor” protocol when contractors enter the company’s facility.
    - The protocol includes making available the following information to each outside contractor whose employees may potentially be exposed to chemicals in the affected production areas.
        - Any hazardous chemicals with which they may come in contact with.
        - Measures the contractor’s employees may take to lessen the risk of chemical exposure.
        - Where to obtain SDS for all hazardous chemicals used in the facility.
        - Chemicals the contractor brings into the facility, type of work provided, etc.
    - The **Safety Manager** will obtain SDS for all hazardous chemicals which an outside contractor may bring into the facility that would affect Aircorps Aviation employees.

DOT Labeling

- DOT picture symbols are classified as Pictograms and are allowed in conjunction with the GHS pictograms for the same hazard.
- DOT markings and labels on containers will be required to be maintained in conjunction with GHS labeling. The DOT labels can be removed if the container is cleaned of residue and purged of vapors.
- DOT markings, pictograms and labels are to be maintained in a manner that ensures they are readily visible.

Transfer of Records

- The Upper Management will transfer environmental & biological testing documents and SDS to the successor employer where the new owner is the keeper of these records under corporate guidance.
- Where there is no successor employer, AirCorps Aviation is to notify current employees of their right to access their records at least 3 months prior to business cessation.
- Notify at least three months before the cessation of business the transfer records to MN OSHA.