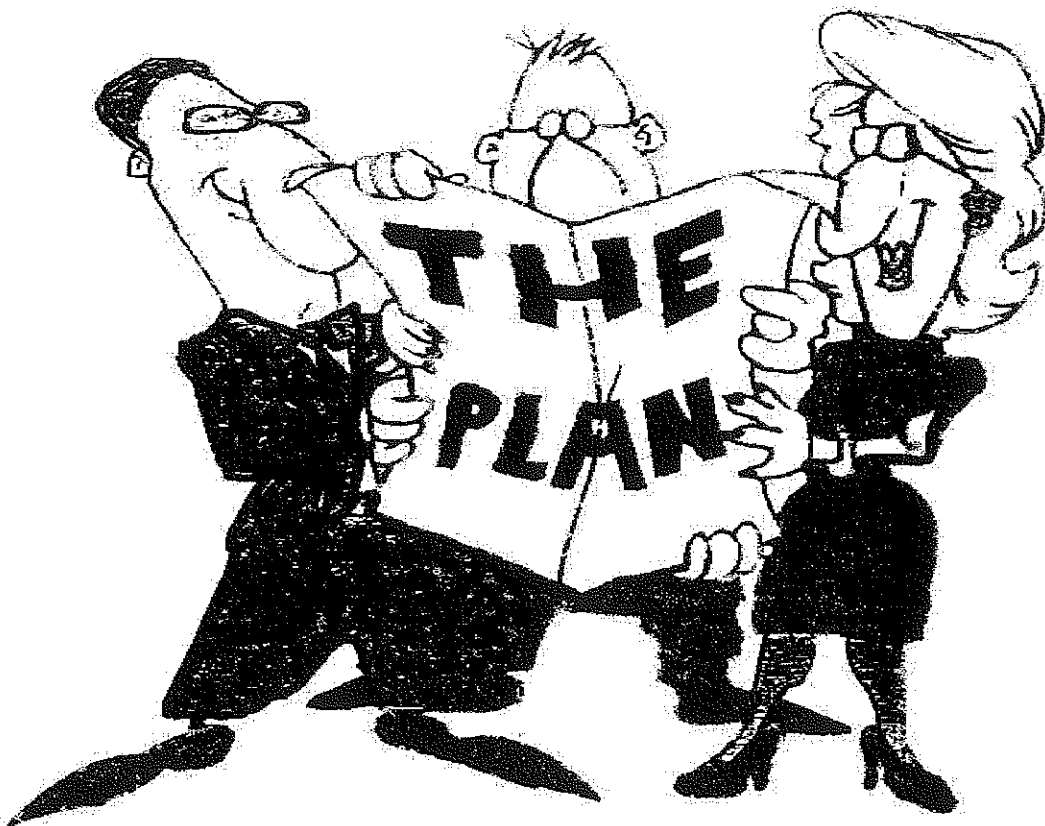


The Alaska Club Written Hazardous Communication Program



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Introduction:

The Alaska Club has developed a Hazardous Communication Program to enhance our employees' health and safety.

As a company we intend to provide information about chemical and physical agent hazards and the control of hazards via our comprehensive hazard communication program which includes **Container labeling, Globally Harmonized System, Hazardous Non-Routine Tasks, Chemicals in unlabeled pipes and Multi-Employer Worksites**

1. Container Labeling

It is the policy of this company that no container of hazardous chemicals will be released for use unless it has a readable label with the information required by the Globally Harmonized System

The Operations Manager will insure that all secondary containers are labeled with GHS compliant labels

2. Globally Harmonized System (GHS) and Safety Data Sheets (SDS)

The Globally Harmonized System was designed to create a worldwide uniform process of labeling and handling Hazardous chemicals. Manufacturers are required to identify their hazardous chemicals with labels that contain common information such as Product Identifier, Signal word, Pictogram, Hazard statement, Precautionary statements and Supplier information,

Product identifier: This is how the chemical can be identified. This can be the chemicals common name, code or batch number this is always located in section 1 of the SDS sheet.

Signal word: Used to identify the type of hazard the chemical presents. There are only 2 signal words, "Danger" and "Warning"

Danger is used in the more severe hazards and Warning is used in the less severe hazards.

Pictogram: This is a picture in a square turned on point and it shows the type of hazard the chemical presents. There are only eight Pictograms total (see the attached Pictogram quick card reference sheet)

Hazard statement: Describes the nature of the hazard of the chemical, and where appropriate, the degree of hazard. Example "Causes damage to the Kidneys through

prolonged and repeated exposure when absorbed through the skin”

Precautionary statements: Describes the precautionary measures that need to be taken when working with or handling a certain chemical.

Supplier information: General information about the manufacturer and emergency contact phone numbers

Copies of SDS for all hazardous chemicals to which employees of this company may be exposed are located at the front desk of every club in a Black binder. No other Black binders will be present at the front desk to help speed up locating the SDS book in the event of an emergency.

It is the Alaska Clubs policy that no new chemicals will be brought into a club without prior permission from the Operations manager. This will insure that all chemicals are accompanied by an SDS

4. Employee Training and information

New employees are to attend a health and safety orientation, which will be held during the regularly scheduled New Employee Orientation. The following subjects will be discussed.

1. An overview of the requirements contained in the hazardous communication program.
2. Review of the chemicals and physical agents present in their workplace. This will be the responsibility of the Operations Manager to insure that this gets done relative to specific chemicals located in each facility.
3. General information pertaining to common chemicals present in the workplace
4. Methods and observation techniques used to determine the presence or release of hazardous chemicals and physical agents in the work area.
5. How to lessen or prevent exposure to these hazardous chemicals and physical agents through usage and control/work practices and personal protective equipment.
6. Steps the company has taken to lessen or prevent exposure to these chemicals and physical agents.
7. Emergency procedures to follow if our employees are exposed to these chemicals and physical agents.
8. How to read labels and review SDS to obtain appropriate hazard information.

NOTE: It is very important that all of our employees understand the training. If you have any additional questions please contact your Supervisor.

When new chemical hazards are introduced, your supervisor will review the above items as they relate to your work area.

Hazardous Non-Routine Tasks:

Periodically, employees are required to perform hazardous non- routine tasks. Prior to starting work on such projects, each affected employee shall request information from their

supervisor about hazards to which they may be exposed to during such an activity
This information may include:

- Specific chemical hazards.
- Protective safety measures that must be utilized.
- Measures the company has taken to lessen the hazards including ventilation, respirators, and presence of another employee and emergency procedures.

5. Chemicals in unlabeled pipes (if applicable)

To insure that our employees who work on unlabeled pipes have been informed of the hazardous materials contained within, the following policy has been established:

- Prior to starting work on unlabeled pipes, our employees are to contact their Department Head for the following information:
- The chemical in the pipe.
- Potential Hazards.
- Safety precautions that should be taken.

6. Multi-Employer Worksites

Periodically, outside contractors will perform work in your facility and may potentially be exposed to hazards, it is the responsibility of the Operations Manager to hold a meeting with the other contractor(s) to:

- Provide them with copies of SDS or provide them with information of the location and availability of SDS for the hazards their employees may be exposed to while working.
- Inform the employer(s) of any precautionary measures necessary during normal operating conditions or emergencies.
- Inform the employer of the labeling system used at the work site.
- Obtain SDS for any hazardous chemicals or physical agents that the other employer(s) may bring on the work-site.