

Document Name: Hazard Communication Program	Control Number:	 A CRH COMPANY	 A CRH COMPANY	 A CRH COMPANY
Revision Date: 08/14/26	Revision Number: 1			
Revised By: Ligia Pascual	Owner: Safety			

Hazard Communication Program

OSHA 29 CFR 1926.59 and MSHA 30 CFR Part 47

Purpose

This SOP outlines the requirements for communicating chemical hazards, maintaining Safety Data Sheet (SDS) access, labeling containers, training employees, and documenting compliance for hazardous chemicals and substances used across projects and facilities.

Scope

This procedure applies to projects and facilities where employees may use, handle, store, or be exposed to hazardous chemicals or substances. The procedure is based on the Hazard Communication/Globally Harmonized System (GHS) requirements referenced in OSHA 29 CFR 1926.59 and MSHA 30 CFR Part 47.

Responsibility Assignment

Role	Responsibilities
Safety Department	Serve as a resource for HazCom questions, SDS access, training support, procedure preparation, compliance monitoring, and SDS database maintenance.
Project Managers	Ensure HazCom requirements are followed, develop a project-specific HazCom program, maintain the hazardous chemical inventory, and notify Safety of new materials requiring an SDS.
Superintendents	Audit the program for compliance and notify the Project Manager if new materials are purchased that require an SDS.
Foremen	Ensure employees have SDS access, verify containers are labeled, confirm flammable liquids are stored correctly, and notify the Project Manager of new materials requiring an SDS.
Hazard Communication Coordinator	Maintain the project chemical list, ensure SDS files are available, monitor labels and SDSs, provide or coordinate employee training, and inspect the posted HazCom notice.
Human Resources	Maintain documented HazCom training records in the employee training file, when applicable.
Contractors/Subcontractors	Maintain their own HazCom programs and provide information about chemical/substance hazards that could affect company employees.

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Procedure

1. A list of “Hazardous Chemicals Known to be Present” should be developed by the Project Manager and maintained at each facility/project.
2. Manufacturers or distributors must evaluate their products hazards, GHS labels and SDS’s. These must be attached to the containers and maintained until the container is safely disposed of in accordance with the Hazard Communication Program. All other chemical containers used will also be labeled with the same or comparable information.
3. Safety Data Sheets (SDS) must be provided by manufacturers or distributors and maintained at the job site for reference and training purposes.
4. Employees working with hazardous chemicals, as well as those who may come into contact with them, will be provided with information and training concerning the hazardous chemical to ensure employees understand all hazards for proper handling. Training will include, but will not be limited to:
 - Explanation of the Hazard Communication standard;
 - Training requirements of the standard;
 - Company Hazard Communication Program explanation and location;
 - Company training program;
 - Chemical inventory and where to find it;
 - Location of hazardous chemicals;
 - Description of labeling system;
 - Description of client/plant hazard rating system;
 - Description and use of SDSs and their location, and
 - Trade secrets.

Project Hazard Communication Program

A compliance program must be established in writing by the Project Manager and a copy available on the job site. A sample Hazard Communication Program is included to be used for facility and project adaptation.

Hazard Communication Program Implementation and Training guidelines are provided to assist project management in understanding the Hazard Communication Regulations.

Documented training is essential in order to meet the requirements of the Hazard Communication Standard. Hazard Communication training documentation will be maintained by the Safety Department.

The EHS Department is available to assist in the preparation of procedures, employee training, and monitoring for compliance.

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Forms

- Hazard Communication Program Implementation and Training Guidelines
- Safety Data Sheet (SDS) Lookup
- Safety Data Sheet (SDS) Break-Down
- Globally Harmonized System (GHS) Label
- Pictogram Classification

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Appendix A

Hazard Communication Program Implementation and Training Guidelines

Purpose: To ensure compliance with OSHA 29 CFR 1926.59 and MSHA 30 CFR Part 47, and to ensure that all employees are notified and trained regarding hazardous chemicals/substances in the workplace.

The project manager is responsible for the hazard communication program on the project. The project manager may designate a person or persons to be responsible for the implementation of this program. The designated person(s) are: _____

Curriculum:

All employees shall be provided with the following information:

1. CRH is required by OSHA 29 CFR 1926.59 and MSHA 30 CFR Part 47 to have a Hazard Communication Program.
2. Details of the Hazard Communication Program including:
 - a. The location and availability of a list of all hazardous chemicals/substances used by the company.
 - b. A list of all hazardous chemicals/substances known to be present in the work area is kept and available for review by employees during each work shift at this location:

 - c. Safety Data sheets (SDSs) for hazardous chemicals used within the project are available for review by employees during each work shift at this location:

 - d. Specific operations or tasks in the employee's area that use hazardous chemicals/substances.

All employees shall receive the following training:

1. Methods and observations to detect the presence of hazardous chemicals.
2. The specific physical and health hazards of known hazardous chemicals in their work area.
3. Protective measures, including the use of personal protective equipment and work procedures.
4. Understanding, interpreting and using hazard information provided on labels and in SDSs.
5. If a non-routine task is to be performed, employees must be trained prior to the work assignment.
6. Training for foreseeable emergencies (such as fires, floods, or spills) shall be provided

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to all affected employees as part of their general safety training.

3. Safety Data sheets will be collected and maintained on jobsites, fixed facilities, and on the online SDS data portal concerning all hazardous substances, chemicals, agents, and processes. These SDS will be maintained by the hazard communication coordinator and made readily available to employees upon request.

The following is a partial list of required SDSs. (Do not consider this to be inclusive of all known chemicals/substances.)

- a. Asphalt related: petroleum asphalt, asphalt emulsion, asphalt binder
 - b. Concrete related: cement, curing compounds, additives
 - c. Underground utility related: pipe dope, compounds, lead, pipe lubricant
 - d. Base related: aggregates, soil cement, lime
 - e. Cleaning agents, solvents, MEK, acetone, alcohol, degreasers, methyl, mineral spirits
 - f. Paints and thinners, epoxy, latex, compound
 - g. Welding and cutting: Oxygen, gases, welding rods, fluxes or metals (that become hazardous when being cut or welded)
 - h. Gas, diesel fuel, oils, greases, cutting oils, fluids
 - i. Plant related: insulation materials: wool, fiberglass, foam
 - j. Radiation sources: Troxler
 - k. Any other chemical or substance found on the project that employees will be exposed to.
4. Project management will not allow a chemical/substance covered under this program into the workplace or employees to be exposed to the substance until the following conditions are met:
 - a. A specific Safety Data Sheet (SDS) is available concerning the chemical/substance.
 - b. The supervisor has seen the SDS, reviewed the SDS with affected employees, and educated new employees.
 - c. Appropriate warning labels are attached to the containers, and the supervisor has been notified as to its location and use.
 5. All substances and chemicals will be labeled with a GHS universal label and maintained in their original container and/or in an approved safety can. Labels will be attached to the can and will contain the following information:
 - a. Chemical Name with Product Identifier Code and Supplier Identification listed.
 - b. Precautionary Statements that describe recommended measures that should be taken to minimize or prevent employee exposure or improper storage and handling.

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- c. Pictograms that are used to identify various hazards. (All 9 pictograms and the hazards they represent are attached to this standard)
- d. Harmonized Signal Words declaring whether the chemical presents an imminent danger or if the chemical should present a warning. Each label will contain one of the two signal words, "Danger" or "Warning". "Danger" indicates that the hazards are more severe.
- e. Hazard Statements that are specific to the hazard class and classification categories.
- f. Supplemental Information, such as the name, address, and phone number of the chemical manufacturer, distributor, or importer.

These labels will remain on the container during use on the project.

The Hazard Communication coordinator will monitor the project site weekly to assure that all containers are identified with labels and SDSs are on file.

Specific labeling information shall be obtained from the manufacturer, supplier, or distributor. The EHS Department should be contacted if further assistance is needed.

The project is responsible for securing an adequate supply of labels from whatever source they choose.

6. The Hazard Communication Coordinator will prepare a hazardous chemical/substance list of all known chemicals/substances. The list will include the following information:
 - a. Name of the substance
 - b. Its supplier/source
 - c. Its location on the project
 - d. Use on the project
 - e. SDS number

The SDS will be maintained on all substances in a central file available to all employees at an identified location or on our online SDS data portal. These files must be available to all shifts at all times. Under no circumstances will a chemical/substance be used in the workplace without the employees being trained, an SDS being on file, the chemical/substance containers being labeled, and the chemical/substance appearing on the hazardous chemical/substance list.

7. Employee training will be conducted by the Hazard Communication Coordinator, or under his/her direction. The Hazard Communication Program will be identified to all employees, all new employees, and any employees of our direct contractors.

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Note: Contractors are responsible for their employees' hazard communication programs. The contractors/subcontractors will inform us of their chemical/substance hazards so that we may protect our employees. It is not our duty or obligation to gather this information for the contractor. Contractors are required by our subcontract to provide us of this information.

The persons designated will be trained in:

- a. All sections of the SDS, how to read the data sheets, and their location within the project.
- b. How to handle an emergency (self-rescue, fire, toxic clouds, etc.).
- c. In reading labels and what to do if a label is not present on a chemical/substance found in the workplace.
- d. Any new labels, SDS, and chemical handling before use

8. Hazard Communication Notice

The Hazard Communication Notice will be posted on the Company bulletin board for all employees to read. The Hazard Communication Coordinator will visually inspect the notice monthly to ensure that it is legible.

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Appendix B

Safety Data Sheet (SDS) Lookup:



<https://nacrh.cority.com/publicchemproduct/publiclogin.rails?view=1028>

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Appendix C

Safety Data Sheet (SDS) Break-Down

There are 16-sections and only sections 1-11 and 16 are mandatory.

Section 1 states the “ Identification ” of the chemical on the SDS as well as the recommended uses. This section will state the product and manufacturer or distributor’s name/identifier used on the label. Along with the manufacturer, importer, or other responsible party address, phone number, an emergency phone number, the recommended use, restrictions on use, common names or synonyms by which the substance is known.
Section 2 is the “ Hazard(s) Identification ” that includes all the hazards regarding the chemical and appropriate warning information associated with those hazards. • Hazard classification (health, physical and mixture classification) • Signal word • Hazard(s) statements
Section 3 includes information on the chemical’s “ Composition/information on ingredients ”. Including substances (chemical name, synonyms, CAS number, impurities and stabilizing additives), mixtures (concentration), and chemicals where a trade secrete is claimed (statement stating information is being withheld).
Section 4 provides “ First-Aid Measures ” which would include important symptoms/ effects and required treatment.
Section 5 provides “ Fire-Fighting Measures ” by listing suitable extinguishing techniques and equipment.
Section 6 provides “ Accidental Release Measures ” by listing emergency procedures, protective equipment, proper methods of containment and cleanup.
Section 7 lists precautions for safe “ Handling and Storage ”.
Section 8 states the “ Exposure Controls/Personal Protection ” by providing the OSHA’s Permissible Exposure Limits (PELs), Threshold Limit Values (TLVs), along with the appropriate engineering controls and personal protective equipment (PPE).
Section 9 will list the “ Physical and Chemical Properties ” associated with the substance or mixture.
Section 10 will list the chemical’s “ Stability and Reactivity ”.
Section 11 provides the “ Toxicological Information ” which includes the routes of exposure, related symptoms, acute and chronic effects, and numerical measures of toxicity.
Section 12 is “ Ecological Information ” (Non-Mandatory).
Section 13 is “ Disposal Considerations ” (Non-Mandatory).
Section 14 is “ Transport Information ” (Non-Mandatory).
Section 15 is “ Regulatory Information ” (Non-Mandatory).
Section 16 includes “ Other Information ” like the date of preparation or last revision.

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Appendix D

Globally Harmonized System (GHS) Label

Located at the very top is the Chemical Name, with Product Identifier Code and Supplier Identification listed

On the sides are Pictograms, there are 9 different pictograms that are used to

SAMPLE LABEL

CODE Product Name _____ Company Name Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____	Hazard Pictograms   Signal Word Danger Hazard Statements Highly flammable liquid and vapor. May cause liver and kidney damage.
Precautionary Statements Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified. In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO₂) fire extinguisher to extinguish. First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.	Supplemental Information Directions for Use _____ _____ Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____

To the side of the hazard statement is a Precautionary Statement(s) that describes the recommended measures that should be taken to minimize or prevent an employee from receiving exposure to the chemical or improper storage or handling.

Under the pictogram(s) is a Signal Word, there are only two signal words, "Danger" and "Warning." There will only be one signal word on the label no matter how many hazards a chemical may have.

At the very bottom, the Supplemental Information is listed, like their name, address and phone number of the chemical

After the signal word, the Hazard Statement(s) is described. The hazard statements are specific to the hazard classification categories.

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Appendix E

Pictogram Classifications

GHS - Hazard Pictograms and Related Hazard Classes		
		
Exploding Bomb • Explosives • Self-reactives • Organic Peroxides	Corrosion • Skin corrosion/burns • Eye damage • Corrosive to metals	Flame Over Circle • Oxidizing gases • Oxidizing liquids • Oxidizing solids
		
Gas Cylinder • Gases under pressure	Environment • Aquatic toxicity	Skull & Crossbones • Acute toxicity (fatal or toxic)
		
Exclamation Mark • Irritant (eye & skin) • Skin sensitizer • Acute toxicity • Narcotic effects • Respiratory tract irritant • Hazardous to ozone layer (non-mandatory)	Health Hazard • Carcinogen • Mutagenicity • Reproductive toxicity • Respiratory sensitizer • Target organ toxicity • Aspiration toxicity	Flame • Flammables • Pyrophorics • Self-heating • Emits flammable gas • Self-reactives • Organic peroxides