

	COMPANY HEALTH AND SAFETY PROGRAM	
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	HAZ COM Employee Quiz	Revision: 0

THE HALLEN ENVIRONMENTAL SERVICES, LLC.

HAZARD COMMUNICATION PROGRAM

1.0 PURPOSE: The purpose of this program is to provide a procedure for compliance with Federal regulation and all other state and local regulations that may apply to Hallen Environmental Services, LLC. (HES) operations; and to provide procedures to assure management of the control of occupational health and safety hazards.

2.0 POLICY STATEMENT: In order to conduct our business, HES must use certain materials that require specific precautions to be taken to protect our employees' safety and health. Therefore, it shall be the policy of HES to communicate any hazards associated with the handling of hazardous materials to employees involved in those operations.

It will be the responsibility of department managers and supervisors to ensure that the proper information is obtained and disseminated to the appropriate employees. It will be the employees' responsibility to follow safe practices as outlined in the Material Safety Data Sheets (MSDS) or operating procedures.

This Hazard Communication Program is intended to supplement our normal safety activities. Current safety policies remain in effect.

The effectiveness of the Hazard Communication Program, as with our normal Safety Program, depends upon the active support and involvement of all personnel.

3.0 GENERAL REQUIREMENTS: With respect to hazards created by the use or presence of chemicals in work areas, the following general requirements apply:

- Hazard Determination – HES will generally rely upon the hazard determination conducted by chemical manufacturers and follow instructions contained on Material Safety Data Sheets (MSDS).

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

- Labels and Other Forms of Warning – Appropriate labeling is required for all containers containing hazardous chemicals.
- Material Safety Data Sheets (MSDS) – A file of MSDS's will be maintained at each HES field office and a master file will be maintained at Company Headquarters.
- Employee Information and Training – Employees using or exposed to chemicals in their work will receive specific training regarding each chemical used.
- Written Hazard Communication Program – This document shall constitute the “Corporate Hazard Communication Program” which is required in the Federal regulation.

4.0 SPECIFIC REQUIREMENTS: With respect to employee exposures during gas operations there are a number of specific hazards that are addressed in this program.

- Working in contaminated excavations
- Pipeline Contaminants
- Coal Tar Wrap/PCB's and asbestos
- Recognizing and handling mercury regulators
- Lead Management

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

5.0 HAZARD EVALUATION:

1. General Policy – As an employer, HES is permitted to rely upon “hazard evaluations” as defined by OSHA, conducted by chemical manufacturers, and reflected on MSDS’s. However, it may be necessary to consider the health implications of a particular chemical usage in the specific context of an HES work place and application, and make decisions about levels of personal protection, training administrative control, or engineering solutions required.
2. Managers and Supervisors – Department Managers and supervisors are responsible for day-to-day hazard communication and training of employees; identification and reporting of conditions that may require expert evaluation; and enforcement of standard relating to personal protection.
3. Purchasing – Purchasing is responsible generally to secure MSDS’s from vendors, distribute them as provided below, and to act as a check point to assure compliance with chemical selection procedure.
4. Employees – Each employee who uses chemicals in performance of required duties is responsible to use prescribed safety equipment and handling procedures as instructed by supervisory employees, and to report conditions which may impact on personal health, and to report personal health conditions which may be complicated by exposure to chemicals (e.g. pregnancy, renal disease).

6.0 LABELS AND WARNINGS:

1. Standards – Standards for container labeling are contained in OSHA regulations, Sec. 1910.1200 (f), and further defined below.
2. Omitted or Defaced Labels – Chemicals received at HES facilities that do not bear proper labels are to be properly identified and labeled according to the standard. Chemical containers found elsewhere not labeled, are to be reported to, and thoroughly identified by, a supervisor before a new label is affixed according to the standards.
3. Container Recycling – It may be hazardous to place a chemical into a container that was previously used for another chemical, and the practice should be discouraged. Care is to be taken, in the event reuse is necessary to thoroughly clean used containers, remove old labels, and affix accurate new labels.
4. Locally Prepared Labels – When it is necessary to prepare a label for a container within a HES facility, the standards apply as do for manufacturers. See Sec. 1900.1200 (f) (l) (i) thru (iii) of the OSHA standard.

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

7.0 MATERIAL SAFETY DATA SHEETS (MSDS):

1. General – The MSDS is the most important document in the hazard communication program. IT IS MANDATORY THAT THE MOST RECENT MSDS FOR EVERY CHEMICAL BE AVAILABLE AT EACH WORK PLACE AT ALL TIMES. It is necessary that each person involved in distribution of MSDS's take responsibility to assure that current information is available in all corporate facilities.
2. Master File and List – A master list of chemicals will be maintained for the purpose of complying with Federal, State and Local regulations.
 - a. List Content – The master list will reflect name, address and telephone number of the chemical manufacturer, product name, Hallen Construction Company part numbers, chemical family, location or division and department, and last MSDS issue date on file.
 - b. Updates – The master list and MSDS file will be updated continuously.
 - c. Annual Inventory – Each facility will conduct an inventory annually to detect the presence or absence of chemicals previously listed. The inventory will be submitted for updating and purging of the master list.
3. MSDS Procurement – Although manufacturers are obliged to supply an MSDS with an initial shipment, because of multi-plant and interplant shipments, an original MSDS may not be present with every shipment. To assure proper distribution of MSDS's, the following procedure is to be followed:
 - a. Informal Requirements – Persons requiring an MSDS as part of a chemical selection process may obtain them directly from the manufacturer or order them through the Purchasing Department. MSDS's obtained for review purposes only need not be maintained in the Master file.
 - b. Other Purchase Requires (Purchasing System) – Persons having the authority to approve Purchase Requests are responsible to indicate in the "description" section that the item is a chemical, and the chemical family name. If the item has been previously assigned a hazardous chemical part no., that part number should also be indicated on the purchase requests.
4. MSDS Distribution – The procedure below provides for redundant distribution to assure complete communication.
 - a. MSDS Master File – MSDS's received from vendors will be compared with the Master File to determine whether present, and entered into the file and on the Master List indicating location, as required. Distribution of a new or updated MSDS will be made to the facility using the chemical.

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

- b. Loss Control Coordinator – The Loss Control Coordinator is responsible to assure distribution of current MSDS's to the work place file, work area files as necessary, and to the receiving area file.
 - c. Inter-Plant and Field Operations – HES facilities shipping to other HES facilities will provide an MSDS with the initial shipment of a product, with subsequent shipments when an MSDS is updated, and upon request of any HES facility.
 - d. Missing MSDS's – When a shipment is received and there is no MSDS, either with the shipment or in the department MSDS file, the shipment is to be held until an MSDS is obtained for the file. The department is to notify the Purchasing Department. Purchasing will request an MSDS from the manufacturer/shipper.
5. MSDS Access and Filing – OSHA requires that an MSDS file be maintained in every work place and that it be readily accessible during working ours for emergency use.
- a. Access – Each department will maintain a file of MSDS's in a sturdy binder located so that it is readily accessible to any employee during any shift.
 - b. Filing – MSDS's are to be filed in alphabetical order by: (1) name of manufacturer; and (2) product name.
 - c. Chemical List – At the front of the MSDS file, the location's chemical list is to be placed. The list is to be in the same filing order.
 - d. Missing MSDS's – Notice is to be placed at the front of the chemical list indicating that individuals may contact the facility Loss Control Coordinator or Company Program Coordinator if an MSDS is missing from the work place file.

8.0 EMPLOYEE INFORMATION AND TRAINING:

1. General – The first objective of the hazard communication program is to assure that the employees are fully aware of the hazards associated with the use of every chemical with which he/she must work. This section describes minimum standards for communication and training.
2. Responsibilities
 - a. Company Program Coordinator – The Company Program Coordinator will establish standards, select training materials, and, as required, train first line supervisors.
 - b. Department Managers – Department Managers are responsible to inform and train their employees regarding the elements of this program and to assure that their supervisors are qualified to train their employees.
 - c. Supervisors – First line supervisors are responsible to assure that their employees have received and understand the information and training

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

required by this program, to enforce use of prescribed protective equipment, and to maintain required training records.

3. Information Requirements – Employees are to be informed of the following:
 - a. General Requirements of this Program
 - b. Location of MSDS File, Chemical List, and Written Program – This written program is to be co-located with the MSDS file, and chemical list.
 - c. Presence of Hazardous Chemicals in the Work Area.

4. Training Requirements – Each employee exposed to hazardous chemicals is to receive specific training regarding each chemical to which he/she is exposed according to the following guidance and standards:
 - a. Formality and Frequency – Each manager and supervisor must determine the level of formality and frequency of individual training based upon an assessment of the severity of health hazard from prolonged misuse or potential severity of injury from an accident that may arise out of use of hazardous chemicals.
 - b. Minimum Frequency – Training will be provided no less frequently than upon initial implementation of this program, upon initial assignment of an individual to a work area, and upon any change in chemical hazards within a work area.
 - c. Content – Training of employees is to include at least an explanation of the following elements:
 - Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (visual appearance or odor when released, etc.).
 - Physical and health hazards of the chemicals in the work area.
 - Protective measures to be taken, including procedures established by management to include protective equipment, work practices, and emergency procedures.
 - The MSDS format and how to obtain hazard information from it.
 - The labeling systems that may be encountered or required.
 - Location(s) of the chemical list, MSDS file, and this written program within the work place.
 - The procedure established for handling inquiries arising out of the presence or use of chemicals that are not satisfied by the information contained in the MSDS file.
 - d. Documentation – Each employee receiving training required by the Hazard Communication standard is required to acknowledge so in writing at each session of training. A formal record form is appended to this program and may be locally reproduced. Training records are to be filed at Corporate Headquarters.

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

6. Training Materials

Guidance – Videotapes, films, slides, and pamphlets are resources to facilitate training, but they are not adequate means by themselves to fulfill the training requirements of the standard. In every case, training aids are to be regarded as a supplement to the specific instruction provided by supervisors.

9.0 GAS OPERATIONS SPECIFIC HAZARDS AND TRAINING – Gas Operations

Employees are faced with unique environmental and chemical hazards every day. They must recognize these issues and take the necessary actions to minimize impact to their health and the surrounding environment. Hallen provides various tools to accomplish these goals. The tools provided include (but are not limited to), annual regulatory training, tool box talks, compliance posters, work methods, S.O.P.'s and reference materials provided by the utilities that we work for (i.e. the “Environmental Quick Tips” booklet which is given to every crew and supervisor on Keyspan sites). This section will address four specific hazards that may be encountered in the course of gas operations:

1. Work in contaminated excavations - Also referred to as “dirty dirt or dirty water”. This hazard is usually soil that looks or smells unusual. It may have a gasoline odor, an oily texture or is discolored. It may be water that has an oily layer or heavy sheen (“rainbow”).
 - a. When encountered employees are to notify their immediate supervisor and utility inspector. Soil and water sample analysis may be required.
 - b. The minimum level of protection includes: Chemical Protective Disposable Coveralls, CP Inner Gloves, Outer Gloves (as appropriate), and Disposable Outer Booties. Respiratory protection may be required as well as additional engineering and administrative controls. Note: FR coveralls are required during live gas operations.
 - c. Potentially contaminated soil should be stockpiled on plastic sheeting, tarps or in roll off containers. Soil should be covered to prevent exposure to precipitation. Soil may be returned to the trench as backfill. Call the Utility’s Environmental Operations to make arrangements for disposal of excess soil.
 - d. Potentially contaminated water should never be pumped into the street or storm drains. If space permits, pump the water ahead or behind the work area within the excavation. Call the Utility’s Environmental Operations to make arrangements for disposal of excess water.

2. Pipeline Contaminants – Employees are to avoid the release of pipeline gas condensate liquids, filter blow down/purged materials or debris. These liquids may be flammable, contain PCB’s, Benzene and other contaminants. Gas Condensate can be defined as low pressure drips, hydrocarbon liquids and water/hydrocarbon mix. These liquids are never to be pumped into the street.
 - a. When encountered employees are to immediately notify their supervisor and utility inspector.

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

- b. HES employees are not to remove or dispose of any condensate or debris encountered. As previously stated, they are to contact their supervisor and the utility inspector. Prior to cutting pipe, drip logs are to be checked. If logs indicate that a drip is nearby, the utility is to be notified and the pipe to be checked for liquids. Only after the contaminants are confirmed and removed may employees precede with their work.
 - c. As per our Hazard Communication Program employees are given training specific to the physical and health hazards associated with the chemicals Natural Gas Condensate, including but not limited to Benzene, PCB's and creosote. Such training is to be documented and records are kept at our Central Office.
3. Mercury Management - Mercury can be present in gas regulators, thermostats, manometers, fluorescent lighting and safety switches. Employees are trained to identify these potential sources. Training is provided both "in house" and through the various utilities training guides (i.e. Environmental Quick Tips"). It may be comprised of physical, photographical and verbal examples.
 - a. When a potential mercury source is encountered employees are to immediately notify their supervisor and utility inspector.
 - b. HES employees are not to remove any regulators or other source containing mercury. All work is to stop until the source is removed by qualified personnel.
 - c. Only after the mercury source is confirmed and removed may employees precede with their work.
4. Coal Tar Wrap – is a protective pipeline coating which prevents corrosion and is identified by its hard, thick, black color. The outer coating is usually covered with brown craft paper. Coal Tar wrap may contain non-friable asbestos.
 - a. All employees receive annual Asbestos Awareness and Coal Tar Wrap Removal training. This training is documented and records are kept in HES's Central Office.
 - b. Removal of coal tar wrap is to be performed by documented/trained employees. Surfaces are to be kept wet with amended water/surfactant (i.e. soap solution). Power tools or burning are not to be used. A hammer and chisel, draw shave or scraper, rags and paper towels are the only approved methods for removal.
 - c. The minimum level of protection is: Chemical Protective Disposable Coveralls, Eye Protection, Outer Gloves and Disposable Booties. FR coveralls are required during live gas operations.
 - d. Loose coal tar wrap may be left in the excavation or taken as construction debris. Tools should be cleaned with amended water, rags and paper towels (which are treated as construction debris). Coated pipe must be disposed as construction debris. It may not be disposed of as scrap. All disposable PPE is considered construction debris as well.
5. Lead Management - Incidental lead-based paint disturbances resulting from contact with lead-based materials may occur during work activities not associated with lead abatement. These incidental work activities include drilling

Hazard Communication Program		
Document No.: 7.1	HAZ COM Employee Quiz	Revision: 0

into walls, replacing valves and cleaning lead joints. Lead abatement activities involve more direct and longer duration exposure to lead containing materials.

ALL PAINTED OR COATED SURFACES MUST BE ASSUMED TO CONTAIN LEAD.

- a. Lead awareness training will be provided to personnel whose jobs do not involve the handling or abatement of lead containing materials. This training will identify the locations and quantities of lead containing materials and the procedures to follow to minimize contact with and exposures to lead.
- b. Incidental lead-based paint disturbance may result from the use of the following tools:
 - Pipe wrench or other wrenches (excluding impact guns)
 - Drills.
 - Slugging Hammer.
 - Hydraulic bolting equipment.
 - Equipment removal tools (i.e., pry bar, chain hoist, pipe clamps, jacks).
 - Wheel pipe cutter or threader.
 - "CLECO" tool.
- c. The primary engineering controls to reduce employee exposure are enclosures, wet methods, local exhaust ventilation, shrouded local exhaust on power tools attached to HEPA filters and HEPA vacuums.
- d. When welding, torch cutting, or burning is conducted, lead-based paint must be removed a minimum of 4 inches on either side of the heat application area prior to the start of work.
- e. Eating, drinking, smoking, or chewing gum in the work areas is strictly prohibited.
- f. Personnel must wash their face and hands prior to eating, drinking, or smoking.
- g. All handling, storage, and disposal of lead-containing waste must be conducted properly.
- h. Employees who may be exposed to lead must be offered an annual medical evaluation.

