

HAZARD COMMUNICATION (HAZCOM) PROGRAM

I. POLICY

Southern Global Safety Services, Inc. (SGSS) will provide and maintain information and training to all SGSS employees on the Hazard Communication Program (HAZCOM). The HAZCOM program covers the subjects of the hazardous substances that they will, or potentially could, be exposed to, chemical product labels and other forms of warning communications, Material Safety Data Sheets (MSDS) related to the hazardous substances and their location, communication protocol and procedures, and a complete hazardous chemical listing of chemicals used by SGSS. A written HAZCOM Program will be provided and kept current at each work site. Copies of the Hazard Communication Program are available in the Regional Offices and on our Company Website www.southernglobalsafetyservices.com for review by any interested employee.

II. PURPOSE

The goal of this Hazard Communication Program is to insure that employees understand the physical and chemical hazards they are exposed to, identities and effects of the chemicals they are exposed to when working, and what protective and preventative measures are available to prevent adverse effects from occurring.

III. RESPONSIBILITIES

The Safety and Health Managers, Kevin Banks – Western Regional Manager and Bob Cook – Eastern Regional Manager, are responsible for maintaining the effectiveness of and implementation this HAZCOM Program. The Health and Safety Manager is also responsible for providing consultation and specific training on this Program. Project Managers/Supervisors of employees have the responsibility to insure the HAZCOM is implemented during projects and at work sites.

IV. MATERIAL SAFETY DATA SHEET OVERVIEW

Most chemicals used in the workplace have some hazard potential, and thus will require an

MSDS. Basic rule: Any product, which makes use of any hazardous chemical in its formula, is required by law to have an associated MSDS. Some examples of materials which could contain hazardous chemicals include but are not limited to:

Liquids, powders, gases (compressed, etc.), metals, lubricants, items that can generate dust or fumes that can be inhaled will have an associated MSDS. Other examples include:

- Paints – thinners, primers, sprays, etc.
- Oils
- Greases
- Solvents
- Refractory
- Encapsulants
- Coatings
- Absorbents
- Cleaners
- Anti-freeze
- Degreasers
- Adhesives
- Janitorial supplies
- Building materials

V. PRODUCT EXEMPTIONS

Certain products are exempted from the MSDS requirement based on their intended use and/or hazard determination. Some applicable examples include but are not limited to:

- Consumer products (when used in the quantities package directions instruct)
 - Insect Repellent
 - Cosmetics
- Office Supplies
- First Aid Products
- Untreated Wood
- Tobacco Products

VI. ARTICLE EXEMPTIONS

Articles, by definition, are exempted from MSDS requirements. The definition, as written, exempts items other than fluids or particles:

- Which are formed to a specific shape or design during manufacture;
- Which have end use functions dependent in whole or in part upon its shape or design during end use, and;
- Which under normal conditions of use do not release more than very small quantities (minute or trace amounts) of a hazardous chemical, and do not pose physical hazards or health risks to employees.
- Articles may include, but are not limited to:
 - Toner Cartridges
 - Vehicles (exception: maintenance involving fluid replacement)
 - Computers
 - Grease Board Markers
 - Chalk Board Markers

VII. MATERIAL SAFETY DATA SHEET (MSDS) PROGRAM

Southern Global Safety Services, Inc. does not produce any type of hazardous materials. As such, we will not prepare MSDS for distribution.

The purpose of the MSDS Program is to provide all employees with immediate, unobstructed access to MSDS for hazardous substances they are working with. Southern Global Safety Services, Inc. shall have a MSDS for each hazardous substance used by SGSS employees. MSDS are to be acquired from the original manufacturer or distributor. The original hard copies of all Material Safety Data Sheets, for each hazardous substance, are kept in the MSDS Book at each Regional Office. Original hard copies of MSDS never leave the master file, unless through routine maintenance, via the Health and Safety Manager. The Health and Safety Manager is responsible for updating and maintaining the MSDS Book at the Regional Office, and communicating with the Project Managers/Supervisors on any changes made to the content of the MSDS books so both office and field copies are congruent.

The MSDS Book is required to be accurate, continually updated and accessible upon request. Updated copies of the MSDS Book will be provided to each SGSS Project Manager/Supervisor and each Job-site Office. Southern Global Safety Services, Inc. expectation for MSDS timeliness is three (3) years old or less. If the manufacturer has not updated the MSDS in three years, the facility must confirm that the existing document is current by contacting the manufacturer (distributor) yearly to request an update. Only the most current MSDS for a hazardous substance from the same manufacturer will be kept on file. All Project Managers/Supervisors will check the date of all MSDS and use the most current one for each hazardous substance, while discarding all other out-of-date MSDS.

MSDS for hazardous substances, which are purchased by an Employer of Southern Global Safety Services, Inc. and used by SGSS employees, are kept by the Customer and copies are available upon request to SGSS. Location and use of job-site specific MSDS are part of the site-specific training, provided by the Customer. Project Managers/Supervisors are responsible for acquiring and updating MSDS for all hazardous substances found in their work area. The MSDS should be reviewed before using the hazardous substance, and kept in the work area or Job-site Office so that they are readily accessible to all.

All MSDS must be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director in accordance the requirements of 29 CFR 1910.1020(e).

It is important for employees to inquire about the hazard status of products, as many manufacturers create MSDS for non-hazardous chemicals.

It is important to inform the Project Manager/Supervisor or the Health and Safety Manager if a product's use is discontinued.

VIII. HAZARDOUS CHEMICAL INVENTORY

The SGSS Manager/Supervisor is required to maintain a list of all hazardous chemicals known to be present in each work area and to update the list as necessary. This chemical list must include the trade name of the product (as used on the label) the name of the chemical (as referenced on the chemical's MSDS) the manufacturer/responsible party, the manufacturer's/responsible party's contact information, the work area in which the chemical is used, and intended use. A current copy of the chemical list must be kept at each job site and accessible to anyone requesting it. The original copy of the chemical list will be kept at the Regional Office. The Health and Safety Manager is responsible for informing the Project Managers/Supervisors of any updates to the list and providing the updated copies. The chemical list is kept in a 3 ring binder, with the cover clearly labeled "Hazardous Chemicals". This inventory shall list all hazardous chemicals found in the work area. This is to include:

- laboratory chemicals;
- janitorial supplies;
- compressed gases;
- cleaning products;
- materials found in the maintenance departments (such as lubricating oils, solvents, etc.); and
- specialty chemicals used by anyone.

Southern Global Safety Services, Inc. current hazardous chemical listing is shown below:

Trade Name (as used on labels)	Chemical Name(s)	Manufacturer/ Responsible Party	Manufacturer's Address/ Phone Number	Intended Use
A-B-C [®] Asbestos Binding Compound (6421,6422,6423)	Titanium dioxide (off-white only)	Fiberlock Technologies, Inc.	150 Dascomb Road Andover, MA 01810 USA Info: (978) 623-9987 Emergency: (800) 255-3924	Asbestos Binding Compound
AramSCO RMTK Adhesive	Acetone, Heptane, Isobutane/Propane blend	AramSCO	2508 Fairway Park Dr. Houston, TX USA (713) 460-4142	Bonding poly sheeting to walls as well as providing a more permanent seal when bonding poly to poly.
LN-701 Liquid Nails for Projects and Construction	Limestone, Kaolin (Clay), Heptane, Quartz, Benzene, 1, 3-Diethenyl-, Polymer with 1, 3-Butadiene and Ethenylbenzene (Styrene-Butadiene Polymer)	Macco Adhesives and ICI Paints (Canada)	925 Euclid Avenue Cleveland, Ohio 44115 USA 8200 Keele Street Concord, Ontario L4K 2A5, Canada Emergency and MSDS: (800)545-2643	Sample tag adherence to paneling, drywall, furring strips, molding, metal, concrete, siding, corkboard, ceramic fixtures, plywood, and hardboard.
Tuf-Stuf 601	Asphalt, Water, Copolymers, Additives	Black Tuf-Stuf, Inc.	7119 Village Way Houston, TX 77087 (713) 454-0900	Industrial coating and water-proofing
WD-40	Aliphatic Petroleum Distillates, Petroleum Base Oil, LVP Hydrocarbon Fluid, Carbon Dioxide	WD-40 Company	1061 Cudahy Place (92110) P.O. Box 80607 San Diego, CA 92138-0607 Info: (619) 275-1400 Emergency: (800) 424-9300	To clean and help prevent rust, lubricate moving parts, tools, hinges, etc.

When new or additional chemicals are requested, SGSS Purchasing insures the chemical are approved and a current MSDS is available, prior to ordering. If the materials are new, they must be approved by the Health and Safety Manager prior to being purchased. Purchasing is informed by the Health and Safety Manager that the purchase is approved and the Health and Safety Manager updates the Chemical List within 10 days of receipt or purchase. The SGSS chemical list is regularly updated every 6 months and any time a new chemical is purchased by SGSS and used by SGSS employees.

The hazardous chemical inventory is compiled and maintained by the Health and Safety Managers, Bob Cook @731-689-4011 (Eastern Region) and/or Kevin Banks @281-610-4895

(Western Region). Further information on each chemical may be obtained from the MSDS, located in the Company Offices, the Project Offices and the Company Website www.Southernglobalsafety.com.

IX. LABELING

Southern Global Safety Services, Inc. does not produce any chemicals. As consultants we rarely, if ever, purchase any hazardous chemicals. We are primarily concerned with ensuring that every purchased container is labeled. Project Managers/Supervisors must ensure that all hazardous chemicals in his/her area of responsibility are properly labeled. Labels must list the chemical identity, appropriate hazard warnings and the name and address of the manufacturer, importer or other responsible party. All labels shall be legible, in English. For non-English speakers, hazard communications, such as labels, MSDS, etc., shall be provided in their understood language.

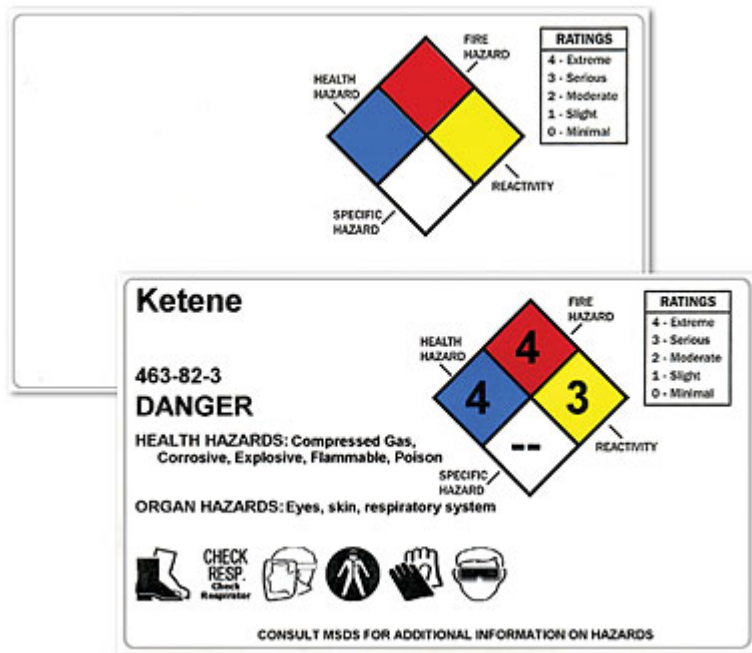
In terms of labeling systems, all SGSS purchased hazardous substances must include labels compliant to our HazCom Program. If the manufacturer's labels are missing required information, SGSS will generate a temporary label to communicate the missing information. Manufacturer's labels are generally verbal text labels, and do not usually include numerical rating systems or symbols which may require special training. An example of a manufacturer's label of a SGSS purchased substance is shown below:



Employer/employees shall not remove or deface labels on incoming containers of hazardous substances. In the event that a label is defaced or removed by normal work processes, uncontrollable by employees, a temporary label will be generated. The temporary labels must include the chemical identity, appropriate hazard warnings and the name and address of the manufacturer, importer or other responsible party. An example of a temporary label used by SGSS is shown below:

Product (MSDS Identifier):
 Hazardous Chemicals:
 Manufacturer:
 Manufacturer's Address

A U.S. National Fire Protection Association (NFPA) diamond label will also be generated for each hazardous substance container, to facilitate in communicating potential hazards. These labels include an explanation of numeric systems, a listing of health hazards, and required personal protective equipment, as shown below:



Project Managers/Supervisors are responsible for reviewing all hazardous substances before employee use, and insuring employees understand the necessary precautions, required personal protective equipment, and associated hazards.

X. MULTI-EMPLOYER JOB-SITES AND MULTI-WORK SITES

It is the responsibility of Project Manager/Supervisor to obtain information about hazardous chemicals used by other employers, to which employees of Southern Global Safety Services may be exposed. This information must include hazardous chemicals at the job-site, location and use of MSDS, precautionary methods and labeling system. If this information is not covered in the site-specific training, provided by the employer, the Project Manager/Supervisor must request this information. The Project Manager/Supervisor will insure this information is readily

accessible to all SGSS employees, other employees, their designated representatives, the Assistant Secretary and the Director in accordance with the requirements of 29 CFR 1910.1020(e).

It is the responsibility of Project Manager/Supervisor to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions. Employers and contractors of Southern Global Safety Services, Inc. will be provided with MSDS for hazardous chemicals introduced to the work area or the project. Prior to introducing, generating or creating the potential for exposure to any hazardous materials or chemicals introduced or generated by Southern Global Safety Services Inc., the Project Manager will provide written downstream and upstream notification to insure the employers of employees have the necessary information to protect them from any hazardous chemicals or constituents. The notification will include information relative to the work areas, routes of exposure, area demarcation, hazardous labels, control methods employed and the duration of the potential exposure or material usage/disturbance, and precautionary measures and training necessary to insure comprehension of the above topics to protect exposed employees. The Project Manager/Supervisor will insure this information is readily accessible to all SGSS employees, other employees, their designated representatives, the Assistant Secretary and the Director in accordance with the requirements of 29 CFR 1910.1020(e).

If an employee travels between work sites during a work shift, the original copy of the written program will be kept at the Regional Office and the Project Manager/Supervisor will keep a copy in their vehicle.

XI. DOWNSTREAM (3RD PARTY) CONTRACTORS

All employees, including employees of contractors, sub-contractors and all other employees hired by Southern Global Safety Services, Inc. are to be instructed in the SGSS HAZCOM Program. This information should be communicated in the existing pre-job meetings, and should encompass all downstream employees.

Products containing hazardous chemicals to be used by downstream Contractors and Sub-contractors, (i.e. Lawn Service, Custodial, Maintenance crews, Service Providers, etc.) must be evaluated for use onsite prior to first time usage. All products containing hazardous chemicals intended for use by Southern Global Safety Services Inc. Subcontractors are subject to evaluation, and a hard copy of all relevant MSDSs is to be kept in a designated 3rd party file at the Regional Office. The file shall be maintained by the Health and Safety Manager and shall include date timelines, start-use and end-use dates.

In the event that a product is determined unsuitable (rejected) for use, the Health and Safety Manager shall notify the office of the 3rd Party Contractor by phone and regular mail. It will then be the responsibility of the 3rd Party Contractor to identify a replacement and go through evaluation again.

In the event of an emergency call out, 3rd Party Contractors are to make certain that copies of MSDSs for all hazardous chemicals used during the emergency subsequently get to the Health

and Safety Manager for filing in the 3rd Party Contractor file at the Regional Office. If a product is to be used on an ongoing basis at the Regional Office, it must go through evaluation.

XII. COMMUNICATING HAZARDS OF NON-ROUTINE TASKS

Employees performing non-routine tasks can be exposed to chemicals from unusual and unsuspected sources. Written procedures, using the Pre-Job EHS Review Form, shall be developed for every non-routine task by the Project Manager/Supervisor of the employees who will perform the task. The information will include chemical hazards, such as chemicals contained in unlabeled pipes in work areas, associated with the performance of the tasks and appropriate protective measures required to perform the task safely. The procedures shall be included in the local copy of the Hazard Communication Program. The Safety and Health Manager will provide advice and guidance upon request. Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in areas containing unknown constituents or hazards, the employee will review the Job Hazard Analysis for additional information and/or contact the Project Manager or the Client Representative for information and or training regarding the chemical in the pipes/equipment, potential hazards, required safety precautions.

Reviewing the safety, health and environmental implications of new and/or modified equipment as well as new processes assists in eliminating hazards that would otherwise be encountered following use of equipment or at the beginning of a process.

The Pre-Job EHS Review Form allows for a comprehensive look at EHS implications before use. The process asks a series of questions on various hazard categories that must be answered satisfactorily before the equipment or process can be used or implemented. This usually requires action based on recommendations from the process. Use the Pre-Job EHS Review Form for risk evaluation and hazard communication.

The Pre-Job EHS Review Forms shall be used at each job-site and maintained by the Project Manager/Supervisor and copies shall be provided to the Health and Safety Manager

XIII. TRAINING

In general, the most important aspects of training under this Hazard Communication Program are to ensure that employees are aware of when and where they are exposed to hazardous chemicals, how to read and use labels and Material Safety Data Sheets, and that, as a result of learning this information, they are following appropriate protective measures. The Safety and Health Manager is responsible for providing and implementing the Hazard Communication Program training.

Information about the Company's Hazard Communication Program will be disseminated to all new employees in the Employee Safety Handbook (page 17). All new employees will receive training on the Company's Hazard Communication Program, at the time of their initial assignment, and whenever a new hazard is introduced into their work area. Supervisors are not responsible to provide any training (in the sense that he/she must develop and present the

training program), but rather must recognize the need for retraining and arrange for his employees to receive it. This training is available in several formats:

- A presentation arranged by the local Safety Committee;
- A site-specific training presentation;
- A video presentation from the Company library;
- A presentation arranged by the Safety and Health Manager or staff; and/or
- A presentation arranged by the Project Manager/Supervisor

Employees must be trained on the proper safeguards, safe use, and physical and health hazards of hazardous chemicals used on the job before beginning work with those chemicals, or whenever a new hazardous chemical or procedure is introduced into their work area. In addition, it is recommended that employees receive annual training updates. Training will include all requirements of this HAZCOM Program including, but not limited to:

- An overview of the OSHA hazard communication standard;
- Physical and health hazards of chemicals in the work area;
- Any operations in work areas where hazardous chemicals are present;
- The different categories of hazardous substances (carcinogenic, corrosive, highly toxic, irritant, sensitizer or toxic) and the different forms (liquid, solid, gas, vapor, fume, mist, powder, residue, etc.);
- Methods and observation techniques used to detect the presence or release of a hazardous chemical by use of monitoring devices, visual appearance or odor;
- Appropriate material handling;
- How to lessen or prevent exposure to these hazardous chemicals through usage of controls, work practices and personal protective equipment;
- Protective measures, including specific procedures, such as appropriate work practices, emergency procedures and personal protective equipment to be used, and;
- How to use Material Safety Data Sheet information and the SGSS chemical listing and where this information is located;
- How to read and understand labels and secondary container labeling and proper

label handling; and

- Contingency plans for medical and chemical accident response.

All training shall be documented by recording the training session subject(s), date, attendees, and providing a copy of the outline for the training session. The Project Manager/Supervisor shall maintain these records and provide copies of all records to the Safety and Health Manager.