Introduction

The Hazard Communication Program is designed to ensure that employees receive adequate information relevant to possible hazards related to hazardous substances used in production operations and processes. The following program outlines how we will accomplish this objective.

The Occupational Safety & Health Administration (OSHA) has developed a Hazard Communication Standard to make sure that needed information reaches employers and employees regarding chemical safety. A copy of the appropriate standard can be found at the websites below or obtained from your Studio Production Safety Representative.

California – Title 8 California Code of Regulations, Section 5194

http://www.dir.ca.gov/title8/5194.html

Federal (other states) - 29 Code of Federal Regulations, Section 1910.1200

http://www.osha.gov/SLTC/hazardcommunications/standards.html

The Hazard Communication Standard focuses on five main areas:

- Identifying Hazardous Chemicals
- Product Warning Labels
- Safety Data Sheet (SDS) (previously called MSDS.)
- The written Hazard Communication Program
- Employee Training

As used in this Program, “hazardous substance” is defined in the Hazard Communication Standard.

Persons Responsible

The Unit Production Manager (UPM) has the primary responsibility for implementing and maintaining the Hazard Communication Program.

Each Department Head is responsible for the administration of the program in his/her respective work area. Typically, the special effects, make-up and paint departments use the majority of the hazardous substances and chemicals. Responsibilities include the monitoring of hazardous substances in the work area, providing appropriate training and maintaining the necessary documentation as described in this program.

All crew members will participate in the program as it applies to their work area and job duties.

Employee Rights

All production employees have the following rights in regard to hazardous substances:

- Receive information regarding hazardous substances to which they may be exposed.
- Provide information to the employee’s physician or collective bargaining agent regarding hazardous substances to which the employee may be exposed.

No employee will be discharged or otherwise discriminated against due to the employee’s exercise of the employee’s rights under the Hazardous Substances Information and Training Act.

Training

Employees must be provided with information and training on hazardous substances in their work area at the time of their initial assignment. Information and training will also be provided whenever a new hazard is introduced into their work area. Training includes:

- The location of the productions' Written Hazard Communication Program.
- The location of the Chemical inventory and SDS sheets as well as the availability of SDS from our SDS provider Verisk 3E.
- Initial response to the spill or release of hazardous materials and the emergency procedures to follow.
- The procedures to properly label containers.

California Only

The Safe Drinking Water and Toxic Enforcement Act of 1986 - California Health and Safety Code 25249 – requires employees to receive information regarding the chemicals used in their workplace that have been identified by the State of California to contain carcinogens or reproductive toxins. The employer will rely on the manufacturer to provide this information on the product SDS. In addition, postings in the workplace will be used to further advise employees.

List of Hazardous Substances

An initial inventory of all hazardous materials present at the worksite must be created. Periodic review should also take place to ensure inventory is complete and accurate. This inventory may be a hard copy or maintained electronically. All crew must be made aware on how to access this inventory as well as SDS. The inventory should include the following information:

- Product Name
- Identification of manufacturer or supplier
- Location(s) product is used
- Date the SDS was prepared.

Safety Data Sheets (SDS)

Safety Data Sheets (SDS) are prepared by hazardous substance manufacturers and contain information concerning the hazards posed by a particular product and provides guidance on its proper handling and use. The employer will rely upon the information contained in SDS and does not perform independent hazard evaluations.

THIS PRODUCTION SUBSCRIBES TO AN ON-DEMAND SDS SERVICE (Verisk3E) that can be used to obtain SDS on-line and by telephone in the event of an emergency. Both services are available 24 hours a day.

To obtain an SDS use the following website: https://www.3eonline.com/EeeOnlinePortal/DesktopDefault.aspx

SDS may also available for employee review in the Construction Department and Production office.

Products Requiring an SDS

All hazardous materials used in the workplace must have an SDS. Examples of products requiring an SDS include, but are not limited to:

- Paints, coatings, thinners, inks, solvents
- Cleaning products
- Petroleum-based fluids including diesel, gasoline, engine additives, oils
- Adhesives, mastics
- Horticulture products such as pesticides, fertilizers
- Special effects "fogs"
- Pyrotechnic compounds
- Art materials, photo processing materials
- Sheet metal, foams, plastic or composite stock that will be cut, welded, machined, sanded or heated
- Batteries containing lead acid or solutions
- Welding rods
- Compressed gasses
- Products that may contain asbestos such as brake shoes, gaskets and roofing material
- Water treatment chemicals
- Solid products such as diatomaceous earth, silica, cement mixes, carbon black
- Refrigerants
- Laboratory chemicals
- Consumer products containing hazardous substances that are used in performing one's job

Products Not Requiring an SDS

The following are examples of products that do not require an SDS:

- Food, O-T-C drugs, cosmetics or alcohol beverages in a retail establishment that are packaged for sale to consumers or intended for personal consumption by employees while in the workplace.
- Manufactured items that do not release or result in exposure to a hazardous chemical under normal conditions of use (e.g. finished furniture, tires, adhesive tape).

Reading an SDS

All Safety Data Sheets contain a standard format comprised of 16 specific sections. Identification information on an SDS will match information on the product container label. Information found in the various sections of an SDS include:

Section 1 – Identification: Names the product, who manufactured it, contact information, and instruction for use.

Section 2 – Hazard(s) Identification: Identifies the hazards posed by the chemical, along with information required to be on the chemical's label, including the pictograms, signal word, hazard statements, and precautionary statements.

Section 3 – Composition / Information on Ingredients: Identifies the ingredients contained in the product known to be hazardous.

Section 4 – First Aid Measures: Describes initial care that should be given by untrained responders to an individual who has been exposed to the chemical; including, first-aid instructions by relevant routes of exposure and a description of the most important symptoms or effects.

Section 5 – Fire Fighting Measures: Provides recommendations for fighting a fire caused by the chemical, including suitable extinguishing equipment, provisions for unique circumstances, firefighter protective equipment and other relevant information.

Section 6 – Accidental Release Measures: Provides recommendations on the appropriate response to spills, leaks, or releases, including containment and clean-up practices to prevent or minimize exposure to people, properties, or the environment.

Section 7 – Handling & Storage: Provides guidance on the safe handling practices and conditions for safe storage of chemicals, including precautions for safe handling, minimizing the release of the chemical into the environment, and providing advice on general hygiene practices.

Section 8 – Exposure Controls / Personal Protection: Indicates the recognized exposure limits, engineering controls/work practices, and personal protective measures that can be used to minimize worker exposure.

Section 9 – Physical & Chemical Properties: Describes the chemical's characteristics, such as its normal appearance, odor, solubility, boiling, melting and freezing points, just to list a few.

Section 10 – Stability & Reactivity: Describes the reactivity hazards of the chemical and the chemical stability information. It is broken into three parts: reactivity, chemical stability, and other. Reactive chemical information would indicate if the material could vigorously polymerize, decompose, condense, or will become self-reactive under certain conditions; chemical stability information will indicate whether the chemical is stable or unstable, including potential hazardous conditions; other information would include possible hazardous reactions, conditions to avoid, incompatible materials and any hazardous decomposition products.

Section 11 – Toxicological Information: Identifies toxicological and health effects information or indicates such data is not available; including, potential routes of exposure, known health effects and symptoms, the numerical measures of toxicity, and if the chemical has been identified to have any cancer causing properties.

Section 12 – Ecological Information

Section 13 – Disposal Considerations

Section 14 – Transport Information

Section 15 – Regulatory Information

Section 16 – Other Information

Container Labeling

All hazardous substances must be labeled and at a minimum, contain the following information:

- The name of the hazardous substance
- Any specific warning or other hazard information
- Identification of the manufacturer or supplier and address.

All secondary containers must have a label that identifies the substance with the same name that appears on the manufacturer's label and the SDS. This information should be legible. Labels are not to be removed or defaced.

Department heads and Supervisors are responsible for ensuring all incoming materials are properly labeled before being used or stored.

Chemical Inventory

A Chemical Inventory document for all hazardous substances must be prepared and be available in the workplace. The inventory should include:

- Production / Department Name
- Inventory Date
- Product Name
- Manufacturer / Supplier
- Product Location

Shared Workspaces

Employers sharing the same work area (e.g., subcontractors), will be informed of hazardous substances to which their employees may be exposed and of suggestions for the appropriate protective measures. This will be done by the Department Head (or their designee) communicating with the responsible representative of such an employer.

Recordkeeping

Copies of training sign-in sheets will be kept on file in the Production Office / Department Head office(s) or the Studio Production Safety Representative office.