

Hazard Communication Program

Prepared for: Ejemplo Industrial Services LLC

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Program administrator: Mariana Garza, Safety Coordinator

CFR: 29 CFR 1910.1200, 29 CFR 1926.59

This program is maintained in English and Spanish. Training is delivered in the language each employee understands.

1. Purpose and Scope

This written Hazard Communication Program establishes how Ejemplo Industrial Services LLC ("the Company") informs its employees about the chemical hazards they may encounter and how they protect themselves. It describes how the Company meets the requirements for labels and other forms of warning, safety data sheets (SDS), and employee information and training under 29 CFR 1910.1200, which applies to construction work through 29 CFR 1926.59.

This program applies to every Company employee and to all work the Company performs in client refineries and petrochemical plants in the Houston Ship Channel area, including work at host facilities operated by clients.

A copy of this program is kept with the SDS binder in each company truck and the company's online SDS folder and is available to any employee, employee representative, client or agency on request.

2. Responsibilities

- Program Administrator (Mariana Garza, Safety Coordinator): maintains this program, the chemical inventory and the SDS collection; coordinates training; reviews the program at least annually.
- Field Superintendent and supervisors (Jorge Salinas, Field Superintendent): make sure every container on the job is labeled, SDSs are on site for every product brought to the job, and crews are briefed before non-routine tasks.
- Employees: read labels and SDSs before using a product, use the required protective equipment, never use a product from an unlabeled container, and report missing labels, damaged containers, spills or symptoms of exposure immediately.

3. List of Hazardous Chemicals

The Program Administrator maintains a list of the hazardous chemicals known to be present in the Company's work, using the product identifier that is referenced on each product's safety data sheet. The list covers the Company as a whole and is updated whenever a new product is purchased or brought to a job, and at least annually.

No product may be taken to a job unless it is on the list and its SDS is on file. Supervisors send the name of any new product to the Program Administrator before first use.

The current list is kept at the front of the SDS binder in each truck and in the online SDS folder, in this format:

Product identifier (as on SDS)	Manufacturer	Where used / stored	SDS on file (date)

4. Labels and Other Forms of Warning

Every container of a hazardous chemical on a Company job must carry the manufacturer's label, or a workplace label that shows the product identifier and words, pictures, symbols or a combination of them that give general information about the hazards of the chemical.

Secondary containers (spray bottles, safety cans, buckets) must be labeled before use with the product identifier and its hazards. The only exception is a portable container that is filled from a labeled container and used immediately and only by the employee who filled it during that shift.

Labels must be legible, in English, and must stay on the container. Supervisors may add Spanish labels for crews whose working language is Spanish. A container with a missing or unreadable label is taken out of use until it is relabeled.

5. Safety Data Sheets

The Company keeps a safety data sheet for every hazardous chemical on the list. SDSs are kept in the SDS binder in each company truck and the company's online SDS folder, and they are readily accessible to employees in their work area during each work shift, without delay and without having to ask permission.

When a product arrives without an SDS, the supervisor does not release it for use and the Program Administrator requests the SDS from the supplier. SDSs that are updated by the manufacturer replace the old version in the binder and in the online folder.

Employees who need help reading an SDS, including in Spanish, ask their supervisor or the Program Administrator.

6. Employee Information and Training

Every employee receives hazard communication information and training at the time of initial assignment, before working with or near a hazardous chemical, and again whenever a new chemical hazard is introduced into their work area that the employee has not previously been trained about.

Training is delivered in a language and vocabulary the employee understands. For crews whose working language is Spanish, training is delivered in Spanish. The trainer confirms understanding by asking each employee to explain a label and locate an item on an SDS.

Training includes at least:

- The requirements of the Hazard Communication Standard and where this program, the chemical list and the SDSs are kept.
- The operations in their work area where hazardous chemicals are present.
- Methods and observations used to detect the presence or release of a hazardous chemical, such as monitoring, visual appearance and odor.
- The physical and health hazards of the chemicals in the work area, including simple asphyxiation, combustible dust and pyrophoric gas hazards where they apply.
- The measures employees can take to protect themselves: work practices, emergency procedures and personal protective equipment.
- How to read the label and the safety data sheet, and how to use that information.

Each session is documented with date, topics, trainer and the name and signature of each attendee. Records are kept by the Program Administrator.

7. Non-Routine Tasks and Unlabeled Pipes

Before any non-routine task that may expose employees to a hazardous chemical, for example cleaning a vessel, breaking into a line, or entering a tank, the supervisor holds a pre-task briefing. The briefing covers the specific chemical hazards, the protective equipment required, the controls in place and what to do in an emergency, and it is recorded on the job safety analysis for that task.

Employees do not work on pipes or lines whose contents are not identified. Before work on or near unlabeled pipes, the supervisor obtains from the host facility the identity of the chemicals contained in the pipes, their hazards and the precautions required, and communicates them to the crew before work starts.

8. Multi-Employer Worksites

Most Company work takes place at host facilities where other employers are also present. At every such worksite the Company:

- Tells the host facility and other employers on site which hazardous chemicals the Company is bringing, and gives them on-site access to the Company's SDSs.
- Informs other employers of the precautionary measures needed to protect their employees during normal operations and in foreseeable emergencies involving the Company's chemicals.
- Explains the Company's labeling system to other employers when it differs from theirs.
- Obtains from the host facility and other employers the same information about the chemicals their employees may be exposed to, and passes it on to Company employees before they start work.

These exchanges take place during the host facility's contractor orientation or the pre-job meeting, and are recorded in the job file.

9. Program Review

The Program Administrator reviews this program at least annually, and whenever a new type of chemical, task or client requirement is introduced, to confirm that it still describes how labels, SDSs and training are handled in practice. Changes are dated and communicated to supervisors.

Management Adoption

Ejemplo Industrial Services LLC adopts this program as its own. Management has reviewed it, confirms that it describes the company's actual operations, and commits the resources needed to implement it. This program is reviewed at least annually and whenever operations, hazards or regulations change.

Signature: _____ Date: _____

Luis Garza, Owner / President

Regulatory Cross-Reference

Each required element of the applicable standard and the section of this program that addresses it.

Required element	Citation	Section
Written program describing how labels, safety data sheets and training requirements will be met	29 CFR 1910.1200(e)(1)	1. Purpose and Scope; 9. Program Review
List of hazardous chemicals present, using product identifiers referenced on the SDS	29 CFR 1910.1200(e)(1)(i)	3. List of Hazardous Chemicals
Methods to inform employees of hazards of non-routine tasks and chemicals in unlabeled pipes	29 CFR 1910.1200(e)(1)(ii)	7. Non-Routine Tasks and Unlabeled Pipes
Multi-employer workplace provisions: SDS access, precautionary measures and labeling system shared with other employers	29 CFR 1910.1200(e)(2)	8. Multi-Employer Worksites
Workplace labeling of containers with product identifier and hazard information	29 CFR 1910.1200(f)(6)	4. Labels and Other Forms of Warning
Safety data sheets maintained and readily accessible during each work shift	29 CFR 1910.1200(g)(8)	5. Safety Data Sheets
Information and training at initial assignment and whenever a new chemical hazard is introduced	29 CFR 1910.1200(h)(1)	6. Employee Information and Training
Training content: detection methods, physical and health hazards, protective measures, labels and SDS	29 CFR 1910.1200(h)(3)	6. Employee Information and Training