



HAZARD COMMUNICATION PLAN

Chemical Inventory, Labels, Safety Data Sheets and Employee Information

POLICY STANDARD

Hazardous chemicals may not be introduced or used until the product is identified, the current label and Safety Data Sheet are available, hazards and controls are reviewed, and affected employees are trained.

PHEIFER BROTHERS CONSTRUCTION CO., INC.

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USE OF THIS PLAN

This plan establishes minimum company expectations and is not all-inclusive. Product SDSs, substance-specific OSHA standards, project specifications and emergency plans may require additional controls.

Primary Regulatory References

- 29 CFR 1926.59, which applies 29 CFR 1910.1200 to construction
- 29 CFR 1910.1200 - Hazard Communication, including OSHA's 2024 amendments and transition provisions
- 29 CFR 1910.1020 - Access to employee exposure and medical records
- Substance-specific construction standards for silica, lead, asbestos and hexavalent chromium

Official references: www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200 and www.osha.gov/hazcom/rulemaking

1. Purpose, Scope, Administration and Responsibilities

Purpose and Scope

This plan communicates hazards from chemicals employees use, handle, store, produce or may encounter at offices, shops, yards and heavy-highway/bridge projects. Wisconsin private-sector construction is under federal OSHA jurisdiction. Hazard Communication does not replace required silica, lead, asbestos, chromium, respiratory-protection, bloodborne-pathogen or other substance-specific programs.

Document Owner / Program Administrator

The company-designated Safety Program Administrator is the document owner. If no Safety Director is employed, executive management will designate a qualified management representative by job title. Duties may be assigned to Human Resources, project managers, foremen, shop staff or qualified outside support, but management retains responsibility for implementation.

Program Administrator

- Maintain this written plan, chemical inventories and SDS system.
- Review new products and changed hazard information before introduction.
- Coordinate effective employee training and periodic compliance reviews.
- Update the plan when chemicals, operations, standards or identified deficiencies change.

Project Managers / Foremen

- Maintain the project inventory and ensure labels/SDSs are available during every shift.
- Review hazards, controls, storage, PPE and emergencies before work begins.
- Coordinate chemical information with other employers and prevent unauthorized products from entering the project.
- Stop work for unknown chemicals, missing information, uncontrolled releases or inadequate protection.

Employees

- Follow labels, SDSs, training and task plans; use required controls and PPE.
- Do not bring, transfer, mix or use an unapproved or unidentified chemical.
- Report missing/damaged labels, unavailable SDSs, leaks, spills, reactions, symptoms or changed conditions immediately.
- Use stop-work authority without retaliation when chemical safety is uncertain.

STOP-WORK AUTHORITY

Any employee may stop work when a chemical is unidentified, hazard information is unavailable or required controls are missing. Work resumes only after correction and authorized review.

2. Chemical Inventory and Product Approval

Facility and Project Inventories

- Maintain a current list of hazardous chemicals known to be present at each facility and active project.
- Use the exact product identifier shown on the container label and corresponding SDS.
- Add, remove or revise entries as products are delivered, replaced, returned or disposed.
- Electronic inventories are acceptable when employees can access them during the shift and a practical backup is available.
- Inventory records and SDSs must permit employees and authorized representatives to identify what was used, where and when as required by applicable record-access rules.

Product Approval

- No employee- or subcontractor-supplied product may be brought onsite until the foreman/designated representative has reviewed the label, obtained the current SDS and approved its use.
- Verify intended use, quantity, storage, incompatibilities, ventilation, PPE, spill supplies, waste handling and emergency procedures.
- Evaluate safer substitutes when practical without creating a different or greater hazard.
- Identify substance-specific requirements before disturbing existing materials or creating dust/fume.

Typical Heavy-Highway / Bridge Chemicals and Exposures

CATEGORY	EXAMPLES
Concrete/masonry	Portland cement, grout, wet concrete, curing compounds, retarders, form oils
Adhesives/coatings	Epoxies, anchor adhesives, sealants, primers, bridge coatings, traffic paint
Fuels/maintenance	Gasoline, diesel, propane, oils, hydraulic fluid, grease, antifreeze, starting fluid
Cleaning/process	Solvents, thinners, cleaners, degreasers, acids, battery electrolyte
Hot work/gases	Oxygen, acetylene, welding rods/wires/fluxes and generated welding fumes
Generated/existing hazards	Silica dust, lead/chromium coatings, asbestos-containing materials and abrasive debris
THE INVENTORY CONTROLS	An example list is not the inventory. Each location must maintain the actual product list that cross-references its labels and SDSs.

3. Safety Data Sheets

Acquisition and Access

- Obtain the SDS before or when a hazardous chemical is first received and confirm the product identifier matches the label and inventory.
- Review new/revised SDSs for hazard classification, controls, storage, incompatibilities, PPE, first aid, spills and fire response.
- Request a replacement from the supplier when an SDS is missing, incomplete or does not match the product.
- Keep SDSs readily accessible during every work shift. Employees do not need permission to review them.
- Electronic access is allowed only when it is prompt and reliable; provide a practical backup for loss of power, internet or device access.
- The project orientation must identify exactly where and how employees obtain SDSs.

Standard 16-Section SDS Format

SECTION	SUBJECT	SECTION	SUBJECT
1	Identification	9	Physical and chemical properties
2	Hazard identification	10	Stability and reactivity
3	Composition / ingredients	11	Toxicological information
4	First-aid measures	12	Ecological information*
5	Firefighting measures	13	Disposal considerations*
6	Accidental-release measures	14	Transport information*
7	Handling and storage	15	Regulatory information*
8	Exposure controls / PPE	16	Other information, including revision date

*OSHA requires the section headings, but does not enforce the content of Sections 12 through 15.

Using the SDS

- Use Sections 2, 4, 6, 7, 8 and 10 during pre-task and emergency planning.
- An SDS is a starting point; the site assessment must address quantity, method, ventilation, confinement, temperature, nearby ignition sources and simultaneous work.
- Report information that conflicts with the label, product or observed conditions.

READY ACCESS

A password, approval step or failed internet connection may not delay employee access to chemical hazard or emergency information.

4. Container Labeling and Hazard Information

Shipped Containers

- Incoming hazardous-chemical containers must retain a legible supplier label with product identifier, signal word, hazard statements, pictograms, precautionary statements and responsible-party information as required.
- Do not remove, cover or deface the label unless immediately replaced by compliant information.
- Keep required DOT labels, placards and markings in place on packages and containers.
- Reject, isolate or correct leaking, damaged, unknown or illegibly labeled containers before use.

Workplace and Secondary Containers

- Label with the product identifier and words, symbols, pictures or other information that communicates the general physical and health hazards and provides specific information with the SDS.
- Use the same product identity as the inventory/SDS; labels must be durable and legible for site conditions.
- A portable container is exempt only when controlled and used solely by the employee who transferred it, within that work shift. It may not be stored, left unattended or passed to another employee without a label.
- Never place a chemical in a food, beverage or other misleading container.

GHS Label Elements

ELEMENT	PURPOSE
Product identifier	Connects the container, inventory and SDS
Signal word	Uses 'Danger' or 'Warning' to indicate relative severity
Pictogram	Graphic symbol within the red diamond for specified hazards
Hazard statement	Standardized description of the nature/degree of hazard
Precautionary statement	Prevention, response, storage and disposal measures
Supplier information	Name, address and telephone number of responsible party

2024 HCS Transition

OSHA's updated Hazard Communication Standard is being implemented through phased compliance dates. Pheifer Brothers will accept compliant manufacturer labels and SDSs during the transition, replace workplace information as updated documents are received, and train affected employees before exposure to newly identified hazards or changed protective measures.

NO LABEL - NO USE

Isolate an unknown or unlabeled container when safe and notify the foreman. Do not smell, taste, mix or test it to identify the contents.

5. Employee Information and Training

When Training Is Required

- At initial assignment before exposure to hazardous chemicals.
- Whenever a chemical hazard employees have not previously been trained about is introduced.
- When operations, labels/SDSs, controls or emergency procedures change enough to require additional understanding.
- When observation, incident, questions or performance show that retraining is necessary.

Training Content

- Purpose and requirements of the Hazard Communication Standard and this plan.
- Operations and work areas where chemicals are present and how to access the inventory, labels and SDSs.
- How to read product/workplace labels, pictograms and all 16 SDS sections.
- Physical, health and other classified hazards relevant to work, including combustible dust and hazards from chemicals released during normal use.
- Routes of exposure: inhalation, ingestion, skin absorption and eye/skin contact.
- Release detection through visible emissions, odor where reliable, monitoring, alarms or exposure symptoms.
- Engineering controls, work practices, hygiene, PPE, respiratory protection, storage, incompatibilities and waste handling.
- Spill, fire, first aid, eyewash, evacuation and emergency-reporting actions.
- Duty to report damaged containers, missing information, releases, exposures and symptoms, and right to review program records.

Effective and Documented Training

- Training may be provided by a knowledgeable company representative or qualified outside trainer.
- Present information in language and vocabulary employees understand and allow questions and demonstration of understanding.
- Generic online/classroom instruction alone is not enough unless actual project chemicals and controls are addressed.
- Document employee name, date, instructor, subjects and project/work location when applicable.
- Toolbox talks reinforce but do not replace required Hazard Communication or substance-specific training.

VERIFY UNDERSTANDING

A signature confirms attendance, not competence. The trainer must use discussion, questions or demonstration to verify employees know how to protect themselves.

6. Project-Specific and Non-Routine Work

Project-Specific Communication

- Identify chemicals used or generated, exposure routes and affected employees before the work phase begins.
- Review ventilation/engineering controls, safe methods, required PPE/respirators, storage/separation, spill supplies and fire hazards.
- Locate eyewash, washing, first aid, SDS access, waste containers and emergency contacts.
- Include the information in orientation, pre-task planning, JHA or toolbox talk as appropriate.
- Update the review when products, methods, quantities, weather, enclosure, adjacent work or crew changes.

Non-Routine Tasks

Before a task not regularly performed, the supervisor must provide task-specific chemical information and controls. Examples include tank/form cleaning, chemical stripping, coating removal, abrasive blasting, spill cleanup, confined-space entry, bridge demolition, torch cutting painted steel and disturbing unidentified coatings.

- Identify the chemical/material, health effects, exposure routes and incompatibilities.
- Define isolation, ventilation, atmospheric testing, work practices, restricted areas and attendants.
- Select PPE/respiratory protection and verify required medical clearance, fit testing or authorization.
- Plan spills, fire, rescue, decontamination and waste disposal.
- Use separate permits, regulated areas and exposure-control programs when another standard requires them.

Stop-Work Triggers

- Chemical identity, label or SDS is missing or inconsistent.
- Required ventilation, PPE, respirator, spill kit, fire protection or washing facility is unavailable.
- Container is damaged/leaking, or an unexpected odor, dust, vapor, reaction, heat, pressure or symptom develops.
- Employees are untrained or actual work differs from the reviewed method.

PLAN FOR THE ACTUAL TASK

Chemical risk changes with application method, quantity, enclosure, heat, mixing and surrounding work. A general SDS review alone does not authorize the task.

7. Multi-Employer Sites, Pipes and Existing Materials

Multi-Employer Coordination

- Before affected work, inform owners, controlling contractors and other employers of hazardous chemicals Pheifer Brothers will bring onsite or generate.
- Explain how SDSs are obtained, necessary precautions, workplace-labeling methods and foreseeable emergency procedures.
- Request equivalent information for other employers' chemicals/operations that may expose Pheifer Brothers employees.
- Coordinate storage, ventilation exhaust, ignition sources, regulated areas, spills, waste and emergency alarms.
- Foremen communicate relevant information to affected employees before exposure and during changing work phases.

Unlabeled Pipes, Tanks and Process Systems

- Before opening, cutting, heating, disconnecting or working near an unlabeled system, determine the contents/hazards as far as practicable.
- Review drawings, owner information, sampling/testing and prior use; do not rely on color or appearance.
- Isolate hazardous energy/material flow and identify required atmospheric testing, drainage, ventilation, PPE and emergency controls.
- Treat unknown contents as hazardous until qualified evaluation establishes otherwise.

Existing Bridge and Construction Materials

- Assess coatings, insulation, mastics, concrete and other materials for lead, asbestos, hexavalent chromium, silica and other foreseeable hazards before disturbance.
- Use owner surveys, records, representative sampling and qualified analysis; absence of an SDS does not mean an existing material is safe.
- Implement the applicable substance-specific plan, exposure assessment, regulated area, hygiene, medical and respiratory requirements.
- Communicate results and restrictions to all affected employers.

EXISTING MATERIALS

Hazard Communication covers information transfer; it does not replace the engineering survey or substance-specific assessment required before demolition, blasting, cutting or renovation.

8. Handling, Storage, Spills and Emergencies

Handling and Storage

- Follow SDS Sections 7 and 10 and manufacturer instructions for temperature, ventilation, grounding/bonding, ignition control and incompatibilities.
- Separate oxygen/fuel gases, acids/bases, oxidizers/organics and other incompatible materials as required.
- Keep containers closed, upright, secured and protected from traffic, weather, heat and damage.
- Use approved flammable-liquid cabinets/containers and quantity controls where required.
- Maintain housekeeping, secondary containment and clear access to extinguishers, eyewash and exits.

Incidental Spill Cleanup

Employees may clean only an incidental release when the product/hazards are known, the release can be safely controlled at the time of occurrence, required training/PPE are available, and cleanup is within assigned duties and capability.

Emergency Release or Exposure

- Stop work, warn others, isolate the area and eliminate ignition sources only when safe.
- Evacuate and call 911/qualified responders for unknown, uncontrolled, highly toxic, fire/explosion, oxygen-deficient or immediately dangerous conditions.
- Do not enter a dangerous atmosphere or attempt rescue unless trained, equipped and assigned under the emergency plan.
- Use eyewash/shower/clean water immediately as appropriate and follow SDS first-aid directions; do not delay medical care for paperwork.
- Notify the foreman/project manager, preserve information/containers when safe and report symptoms promptly.
- Control runoff and environmental releases; coordinate disposal and agency/owner notifications through authorized management.

Restart

- Identify the substance and cause, complete cleanup/decontamination and restore required controls.
- Reassess affected employees and adjacent operations; replace used/damaged PPE and spill supplies.
- Only authorized supervision may release the area after emergency or technical-support requirements are satisfied.

UNKNOWN = EVACUATE

An unknown chemical, atmosphere or reaction is not an incidental spill. Secure the area and summon qualified emergency assistance.

9. Records, Program Review and Stop Work

Required Records

- Current written plan and facility/project hazardous-chemical inventory.
- Current SDSs and superseded exposure information retained or documented as required by 29 CFR 1910.1020.
- Employee training records and project-specific briefings.
- New-product reviews, multi-employer exchanges and non-routine-task documentation as applicable.
- Exposure monitoring, medical, respirator, spill, incident and corrective-action records under the applicable program.

Program Review and Document Control

- Review at least annually and whenever a new hazard, operation, regulatory requirement, incident or observed deficiency requires correction.
- Update inventories/SDSs as products enter or leave; replace obsolete labels and workplace information when changed manufacturer information is received.
- Verify electronic and backup access, jobsite implementation, training quality and contractor coordination.
- Use job titles rather than personal names for program ownership. Printed copies are uncontrolled unless formally issued.
- Retain revision number, effective date, owner, approval and revision history in the controlled system.

Immediate Stop-Work Conditions

- Unknown or unlabeled chemical/container; label and SDS do not match.
- SDS or emergency information is not readily accessible.
- Required training, ventilation, PPE, respirator, hygiene, storage or spill controls are absent.
- Leak, spill, incompatible mixing, unexpected reaction, odor, dust/vapor or exposure symptom occurs.
- Another employer's chemical creates an uncommunicated exposure, or field conditions differ from the plan.

Enforcement

Ignoring labels/SDSs, using unapproved chemicals, defeating controls, entering restricted areas or continuing after a stop-work condition is a safety violation subject to corrective action under company policy.

RESTART AUTHORIZATION

Work resumes only after the chemical and hazards are identified, required information and controls are available, affected employees are informed, and the foreman or designated program representative authorizes restart.

10. Test Your Knowledge

Circle the best answer. Review missed questions with your foreman before using or working near hazardous chemicals.

1. What connects a chemical's inventory entry, label and SDS? A. Container color B. The product identifier C. Delivery date	2. When may an unlabeled portable container be used? A. For one week B. By any crew member C. Only for immediate use by the employee who transferred it
3. When must employees be able to access SDSs? A. During every work shift without delay B. Only during office hours C. After supervisor approval	4. What should happen before a new chemical enters a project? A. Try a small amount B. Review the label/SDS, hazards and controls and add it to the inventory C. Store it until month-end
5. What is SDS Section 8 used for? A. Shipping cost B. Supplier advertising C. Exposure controls and personal protection	6. What should an employee do after an unknown chemical spill? A. Evacuate/secure the area and summon qualified help B. Smell it to identify it C. Wash it into a drain
7. Does Hazard Communication replace the lead or silica program? A. Yes B. Only on small jobs C. No; substance-specific requirements still apply	8. What must happen on a multi-employer project? A. Each employer keeps hazards secret B. Affected employers exchange chemical hazards, SDS access and precautions C. Only the owner needs chemical information
9. What must happen if an SDS and label do not match? A. Stop and resolve the discrepancy before use B. Use the label only C. Use the SDS only	10. What does a training signature prove by itself? A. Full competence B. Regulatory authorization for any chemical C. Attendance only; understanding must also be verified

EMPLOYEE: _____

DATE: _____

ANSWER KEY: 1-B | 2-C | 3-A | 4-B | 5-C | 6-A | 7-C | 8-B | 9-A | 10-C