# Policy Name: HAZARDOUS COMMUNICATION (HAZCOM) POLICY

**Policy Applies to:** **All Associates, contractors, temporary associates, and vendors**

**Prepared by**
Safety

**Effective Date:** May 14, 2024

**Introduction**

PODS is committed to providing all associates with a safe and healthy work environment. Developing a proactive safety program is one of the best ways to protect our Associates from injury.

Hazardous Communication (HAZCOM) is a policy that provides information concerning the dangers of hazardous chemicals used by PODS and ensures that associates are aware of the potential risks and mitigation methods when dealing with such chemicals whenever utilized.

**Purpose**

This document is designed to define and establish a policy for managing the hazardous properties of chemicals with which associates may interact, as well as safe handling procedures and measures to protect themselves from these chemicals, in compliance with OSHA standard 29 CFR 1910.1200 and state plan states.

**Scope**

This policy applies to all handling or usage of hazardous chemicals activities by associates or contractors working at PODS storage centers or maintenance hubs. The HAZCOM policy establishes the minimum requirements for handling, labeling, and reviewing manufacturer/importer/distributor Safety Data Sheets (SDS) and ensures that associates are aware of and utilize the appropriate Personal Protective Equipment (PPE) (see Personal Protective Equipment Policy) during any usage.

**Responsibility**

Managers

- Ensure all associates complete Hazard Communication training as outlined in this policy.
- Ensure that hazardous communication safety requirements are being followed.
- Ensure all containers have legible labels and are replaced when they become illegible or defaced.
- Maintain an accurate inventory of all chemicals in the storage center or hub in SDS Online.
- Periodically check chemical inventory in SDS Online to see if any SDSs have been updated and review the SDS to determine if any changes require training for associates.
- Administer corrective action when associates fail to comply with policy requirements.

Associates

- Complete assigned Hazard Communication training in a timely fashion.
- Associates receive initial and supplementary training to thoroughly understand their responsibilities under this policy.
- Comply with all safety requirements as outlined in this policy.

Safety

- Establish hazard communication guidelines and monitor regulations to ensure they remain current.
- Conduct periodic audits of the Hazard Communication policy and revise it as required.
- Conduct periodic audits of storage centers and maintenance hubs to monitor compliance with this

policy.

Procurement

- Work with vendors to identify the lowest-hazard chemicals that meet business needs.
- Work with vendors to ensure containers are properly labeled and SDS provided promptly upon request.

**Definitions**

*Chemical* means any substance or mixture of substances.

*Chemical name* means the scientific designation of a chemical following the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature or a name that identifies the chemical to conduct a hazard classification.

*Common name* means any designation or identification such as code name, code number, trade name, brand name, or generic name used to identify a chemical other than its chemical name.

*A container* is any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For this section, a vehicle's pipes or piping systems and engines, fuel tanks, or other operating systems are not considered containers.

*Employee* means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

*An employer*, including a contractor or subcontractor, is engaged in a business where chemicals are used, distributed, or produced for use or distribution.

*Exposure* means that an employee is subjected to a chemical that is a physical or health hazard and includes potential (e.g., accidental or possible) exposure. "Subjected" regarding health hazards includes any route of entry (e.g., inhalation, ingestion, skin contact, or absorption.)

*Foreseeable emergency* means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment, which could result in an uncontrolled release of a hazardous chemical into the workplace.

*Hazardous chemical* means any chemical classified as a physical or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

*Health hazard* means a chemical that is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to § 1910.1200 - Health Hazard Criteria.

*Immediate use* means that the hazardous chemical controlled and used only by the person who transfers it from a labeled container and within the work shift in which it is transferred.

*Label* means an appropriate group of written, printed, or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical or the outside packaging.
Label elements are the specified pictogram, hazard statement, signal word, and precautionary statement for each hazard class and category.

*Physical hazard* means a chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas. See Appendix B to § 1910.1200 - Physical Hazard Criteria.

*A pictogram* is a composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category.

*A precautionary* statement is a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

*Product identifier* means the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references among the list of hazardous chemicals required in the written hazard communication program, the label, and the SDS.

*A responsible party* means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

*Safety data sheet (SDS*) means written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of this section.

*A signal word* is used to indicate the severity of the hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

*Substance* means chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities deriving from the process used, but excluding any solvent that may be separated without affecting the stability of the substance or changing its composition.

*Trade secret* means any confidential formula, pattern, process, device, information, or compilation of information used in an employer's business, allowing the employer to obtain an advantage over competitors who do not know or use it. Appendix E to § 1910.1200 - Definition of Trade Secret, sets out the criteria for evaluating trade secrets.

*Use* means to package, handle, react, emit, extract, generate as a byproduct, or transfer.
A work area is a room or defined space in a workplace where hazardous chemicals are produced or used, and employees are present.

*Workplace* means an establishment, job site, or project at one geographical location containing one or more work areas.

**Chemical Inventory and Safety Data Sheets (SDS)**

- Each storage center or hub (workplace) shall maintain a current inventory of all hazardous chemicals used within the facility in SDS Online.
- Upon uploading a new SDS or requesting that one be added to the chemical inventory, the Safety Department reviews the SDS and, if approved, adds it to the inventory. If chemical components are of concern, the Safety Department discusses the use of the chemical and viable alternatives.
- The chemical manufacturer, importer, and some distributors are required to classify and categorize the hazards of the chemicals they produce or import and convey that information via SDS and container labels. PODS relies on this information and does not conduct our hazard assessment.
- SDS online can be accessed via the following options:
    - https://chemmanagement.ehs.com/9/51277700-6146-4b94-a74e-a67d4089d33e/ebinder
    - Once on the SDS Online website, select your location from the All Locations button at the top of the screen to quickly find SDS for chemicals at your location.
- SDS Online regularly searches for SDS updates and automatically updates your chemical inventory.
- All SDS must be in English for US operations, and Canada operations shall follow provincial regulations in the SDS language.
- When a chemical is no longer used at the location, the chemical shall be archived and stored in SDS Online for a 30-year retention period.

**Container Labeling** –

Containers of hazardous chemicals are required to have the original manufacturer's label that includes:

- Product identifier
- Signal word (relative level of severity of hazard)
- Hazard statement(s) (including Proposition 65 warning for chemicals in California)
- Pictogram(s) (symbol on a white background framed within a red border and represents a distinct hazard)
- Precautionary statement(s), and
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible parties.

- Container labels must be maintained in legible condition and not defaced.
    - When pouring paint, associates should try to pour paint from the container to avoid rendering the product name or warnings illegible on the label.
- If a container label is illegible or defaced, a replacement label shall be placed on the container.
- All secondary containers must be labeled with the following:
    - Section 2 of the SDS,
    - Label generated in SDS Online,
    - Label provided by manufacturer, importer, or distributor for secondary containers or
    - A label that includes the following information:
        - Product identifier and words,
        - Pictures,
        - Symbols or combinations thereof provide at least general information regarding the

hazards of the chemical.
    - The only secondary containers not requiring labeling are paint roller trays, provided they are filled for immediate use and remain under the exclusive control of the associate transferring paint from a labeled container to the paint roller tray.

**Proposition 65 (California only)**
The governor of California publishes a list of chemicals known to the State of California to cause cancer, congenital disabilities, or reproductive harm. Manufacturers of these chemicals must have a clear warning on the product label and note such on the SDS.

**Storage**
- All flammable containers shall be stored in the flammable cabinet when not in use.
- Flammable cabinet doors shall be kept closed except when retrieving or placing chemicals in the cabinet.
- Lids of chemical containers shall be put fully in place between uses.

**Training**
All associates shall receive training on this policy and the hazards of hazardous chemicals in their work area at the following times:
- Upon initial assignment.
- Whenever a new physical or health hazard the associates have not previously been trained on is introduced into their work area.
- Before using any new chemical or chemical they were not previously trained on.
- Refresher training is conducted when associates are observed not following safe work practices previously reviewed.

The Hazard Communication policy documented training shall include the following:
- Requirements, details, and rights of the associate as contained in the Hazard Communication regulation.
- Operations and work areas where hazardous chemicals are present.
- Location of the written Hazard Communication policy, SDS, and the chemical inventory.
- How to access SDS.
- How to read and an explanation of labels and SDS for pertinent hazard information and how associates can obtain the information necessary to use the chemical safely.
- Observations that may be used to detect the presence or release of hazardous chemicals by visual appearance or odor.
- The physical and health hazards of chemicals in the work area.
- Protection measures used to prevent exposure.
- Appropriate work practices.
- Emergency procedures.
- Proper PPE to be used.

**Non-Routine Tasks**
- PODS trains associates about hazards and controls associated with routine tasks.
- Associates should not perform non-routine tasks without proper training.
- Before performing non-routine tasks or tasks with unfamiliar hazards, associates should notify their manager of the need for special training, instruction, or direct supervision.

**Contractors**
- Each location must notify any contractor or temporary agency of the following:
    - The hazards associated with the chemicals and materials used in the work area.

    - Standard, precautionary measures and emergency procedures are used in relation to the chemical hazards.
    - The container labeling system used in the work area.
    - How to access the SDS for the chemicals used in the work area.
- Similarly, contractors are to notify PODS of the hazards of any chemicals they may be bringing into the facility or using in their work, how they may impact PODS associates and safeguards they may need to follow.

**Oversight and Monitoring**
The Human Resources Department, Business Unit Leaders, and the Safety Manager closely monitor requirements and performance under this policy. Additionally, the Internal Audit Department performs policy compliance audits.

Non-compliance or abuse of this policy may be grounds for associate counseling action, up to and including termination of employment.

The Safety Department periodically reviews and evaluates this procedure when regulation changes prompt revision or operational changes occur. This program is communicated to all persons affected by the risk of injury and may be subject to the training requirements defined in the governing standards.

**Questions/ Comments**
Any questions or comments surrounding this policy should be forwarded to your Manager, Region Safety Manager, or the Director of Enterprise Safety.

**Revision History**

| Date | Section | Change | Author |
|---|---|---|---|
| 6/1/2020 | | Initial policy | Risk Management |
| 5/14/2024 | | Major policy revision | Safety & Compliance |
| 5/13/2026 | | Review | EHS |