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UPDATED HAZARD COMMUNICATION STANDARD INFORMATION FOR COMPANY EMPLOYEES

LABELS AND PICTOGRAMS

According to revised Hazard Communication Standard (HCS) regulations, chemical manufacturers and importers are required to use new labels beginning June 1, 2015. Distributors may continue to ship products with the old labels until December 1, 2015. However, these new labels may be found on shipped containers prior to these dates. After June 1, 2016, Company can only use products with the new types of labels.

The revised HCS standard requires conforming labels to contain the elements described below.

Shipped Container Label Elements

Product Identifier and Supplier Identification

The product identifier on the label must be the same as found on the SDS. An emergency telephone number for the supplier is now required on labels, in addition to a name and address.

Signal Word

This is a new requirement under the revised HCS regulations. “Danger” and “Warning” are used on the label to indicate the relative severity of a hazard and alert the reader to the potential hazard. “Danger” is used for more severe hazards, while “Warning” is used for less severe hazards.

Hazard Statement

This is a new requirement under the revised HCS regulations. The hazard statement is a prescribed, standardized statement, based on the hazard classification and category for a chemical that describes the nature of the hazard(s).

For example, the hazard statement for an eye irritant may be “Causes eye irritation,” while the hazard statement for a substance with acute inhalation toxicity may be “Toxic if inhaled.”

For products that pose more than one risk, an appropriate hazard statement for each hazard will be included on the label.

Precautionary Statement

This is a new requirement under the revised HCS regulations. 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.










Pictograms

This is a new requirement under the revised HCS regulations. Pictograms are standardized graphics that are assigned to a specific hazard classification. There are nine pictograms under the revised HCS that represent either a physical hazard, health hazard, or an environmental hazard.

There is not a unique pictogram for each individual hazard within a specific hazard classification. One pictogram may be used to represent several individual hazards.

Pictograms are red-bordered diamonds that include a black hazard symbol on a white background. The new pictograms are shown below.

HCS Pictograms and Hazards

<p>Health Hazard</p>  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic) 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity

SAFETY DATA SHEETS

The revised HCS requires chemical manufacturers, distributors, or importers to provide a Safety Data Sheet (SDS), formerly known as a Material Safety Data Sheet (MSDS), to communicate the hazards of chemical products. Effective June 1, 2015, the revised HCS requires chemical manufacturers and importers to provide distributors and employers an appropriate SDS with the initial shipment and with the first shipment after the SDS has been updated. During the phase-in period prior to June 1, 2016, both the old system of MSDSs and the new system of SDSs may be present in the workplace. After June 1, 2016, only the new SDS can be used.

Company will have an SDS for each hazardous chemical in the workplace and will make the SDSs readily accessible to employees through an online database. The 3E Online MSDS/SDS database is accessible through the 3E Company website located at www.3Eonline.com. A user name and password is required to log on. The user name is (paramount) and the password is (msds123). In addition to the 3E Online MSDS/SDS database system, information from MSDS/SDS can be obtained 24-hours, 365 days a year by calling: (800) 451-8346. If the SDS is not provided with a shipment that has been labeled as a hazardous chemical, Company will obtain one from the chemical manufacturer or distributor or from the 3E Online MSDS/SDS database, as soon as possible.

The new format of an SDS requires a specific order of information and includes sixteen numbered sections, standardized headings, and associated information as follows:

Section 1 – Identification

Product identifier; manufacturer or distributor name, address, and phone number; emergency phone number; recommended use; restrictions on use.

Section 2 – Hazard(s) identification

All hazards regarding the chemical; required label elements.

Section 3 – Composition/information on ingredients

Chemical ingredients; trade secret claims.

Section 4 – First aid measures

Important symptoms and effects, including acute and delayed effects; recommended treatment.

Section 5 – Firefighting measures

Suitable extinguishing techniques and equipment; chemical hazards from fire.

Section 6 – Accidental release measures

Emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7 – Handling and storage

Precautions for safe handling and storage, including incompatibilities.

Section 8 – Exposure controls/personal protection

OSHA's Permissible Exposure Limits (PEL); Threshold Limit Values (TLV); appropriate engineering controls; personal protective equipment (PPE).

Section 9 – Physical and chemical properties

The characteristics of the chemical.

Section 10 – Stability and reactivity

Chemical stability and possibility of hazardous reactions.

Section 11 – Toxicological information

Routes of exposure; related symptoms; acute and chronic effects; numerical measures of toxicity.

Section 12 – Ecological information

Effect of product on plants or animals and its ultimate environmental disposition.

Section 13 – Disposal considerations

Safe disposal of the chemical, including safe handling practices.

Section 14 – Transport information

The proper shipping name, hazard classification, United Nations Identification Number, transport label required, and other information required for transporting the product.

Section 15 – Regulatory information

Classification of the chemical under federal regulations including the Toxic Substances Control Act, the Clean Water Act, and the Superfund Amendments and Reauthorization Act. May also include applicable state and international regulations as well as European Union classification and EU risk and safety phrases.

Section 16 – Other information

Includes the date of preparation or last revision.

If a section does not apply to a particular chemical, then that section will be marked N/A (not applicable), rather than being left blank.

The full Company Hazard Communication Program is available to all employees, at any time, from the Safety Program Director or designee.