



**Maryland Department of Environment**  
**Land Management Administration**  
**Hazardous Waste Program**  
 1800 Washington Blvd, Baltimore MD 21230  
 (410) 537-3400

**Report of Observations**

**RCRA ID #:** MDD042682398                                  **Generator Status:** LQG  
**Facility Name:** Hagerstown Aircraft Services (HAS)  
**Address:** 14235 Oak Springs Road  
**City:** Hagerstown                                          **State:** MD    **Zip:** 21742  
**County:** Washington  
**Site Contact:** Kim Potter  
**Title:** Owner/Operator                                  **Phone #:** (301) 733-7604  
**Inspection Type:** CEI-On-Site                              **Activity #:**  
**Inspection Start Date:** May 3<sup>rd</sup>, 2013  
**End Date:** May 3<sup>rd</sup>, 2013  
**MDE Lead Inspector:** Anthony Enweze  
**Other Inspector:** Paul Sudano

**Documentation**

<input checked="" type="checkbox"/> Photos/Videos taken	<input type="checkbox"/> Other documentation
<input type="checkbox"/> Documents obtained from facility	<input type="checkbox"/> Request for submission of documents
<input type="checkbox"/> Samples taken by outside source	<input type="checkbox"/> Samples taken by the Department

**Checklist:**                   Generator                                   TSD Facility

**Introduction**

MDE at the request of EPA conducted the CEI on May 3<sup>rd</sup>, 2013. I arrived at the facility with Mr. Paul Sudano at 10:50 AM and met with Ms. Kim Porter, the facility owner. After a brief introduction, Ms. Potter called her staff, Andy Shanholtz and Keith Sheffler to join us for the pre-inspection.

Hagerstown Aircraft Services (referred to as HAS or Facility) was formerly Alphin Aircraft, Inc until 1996 when it was purchased by HAS. After the acquisition, HAS did not notify the Maryland Department of the Environment (MDE) and the EPA Identification Number for hazardous waste disposal still shows Alphin Aircraft, Inc., as the facility operator.

MDE record review shows that on April 28<sup>th</sup>, 2010, EPA led a joint compliance evaluation inspection (CEI) with MDE because of a citizen complaint alleging that the facility was dumping hazardous waste into the environment. The report of observation written by EPA after the inspection is on file and no action was taken thereafter even though there were violations observed at that time.

On May 3<sup>rd</sup>, 2012, MDE conducted another compliance valuation inspection (CEI) at the request of EPA. I, Mr. Anthony Enweze, as the MDE lead inspector, accompanied by Mr. Paul Sudano of MDE conducted the inspection.

### **Facility Background**

HAS is a privately owned company located within the property line of Hagerstown Regional Airport with complete access to airport runways. The company occupies rented space of six building areas from the airport administration. Mr. Tracey Potter, owner operated the facility since 1996 as a small aircraft maintenance company. The facility layout includes the administrative building, engine, structural repair, painting, stripping, preparation, and equipment maintenance shops. HAS company has about 13 employees, according to Mr. Sheffler.

### **Inspection**

The pre-inspection meeting discussion started with the tragic story of Mr. Tracey Potter, owner about two months ago by Ms. Kim Potter, his wife. Ms. Potter stated that in the aftermath of her husband's death she is left with a business that she knows nothing about. Then she introduced Mr. Andy Shanholtz whom she employed to help organize things and Mr. Keith Sheffler, longtime manager at HAS that worked with her late husband for some years. Ms. Potter stated that Mr. Sheffler will guide and answer MDE questions during the inspections as the most informed of the HAS operations. I briefed the facility on the inspection process and commenced the inspection activities. Shortly after, Ms. Potter excused herself to attend other scheduled appointments.

### **Processes**

Mr. Sheffler explained the company business and layout of its operations. He stated that HAS business is in maintenance of small aircraft with emphasis on engines, avionics and structural repairs analogous to the activities at autobody shops. The paint shop uses solvent based paints and mineral spirits (lacquer thinner) for cleaning. Mr. Sheffler stated that stripping and washing are an integral part of the processes from which the facility generates hazardous waste.

### **Waste Stream**

On inquiries about the hazardous waste generated HAS business operations, Mr. Sheffler stated that hazardous wastes are generated from:

1. Aerosol from painting and cleaning
2. Solvent based paints unused or discarded
3. Mineral spirits (lacquer thinner) from cleaning
4. Stripping of old paints with caustic stripper (SPC 909) solution
5. Used fluorescent bulbs, universal waste (UW) from facility lighting

Mr. Sheffler stated that painting and stripping are the two primary sources of hazardous waste in all cases of its business processes.

## Document Review

Hazardous waste management documents and the outcomes are:

1. Manifests – No manifest was available for review at the facility
2. Inspection logs – Such practices and Mr. Sheffler could not provide them.
3. Contingency plan – Mr. Sheffler said that contingency plan for hazardous waste management does not exist but the facility has safety plan.
4. Material Safety Data Sheet (MSDS) – Mr. Sheffler had none during inspection
5. Employee training records – Mr. Sheffler stated that he is only aware of training for safety but not hazardous waste management

Mr. Sheffler stated that the above listed documents will take time to find since they were handled by the late Mr. Tracey Potter.

MDE requested to see the facility assigned EPA Hazardous Waste Identification Number and Mr. Sheffler could not provide any.

## Facility Tour

Mr. Sheffler of HAS, Mr. Paul Sudano and I, Anthony Enweze toured the facility and observed:

1. Two large tanks each of 500-gallon capacity used for storage and separation of wastewater from stripping operations. Mr. Sheffler stated that the first serves as the holding tank where water is separated leaving behind the bottom tank sludge. He stated that pH adjustment of the wastewater takes place in the tank by addition of corrosive liquid as needed. The tank sludge is pumped into a bath tub container where it is dried by heat into solid blocks and disposed in the trash as solid waste. I inquired if waste determination was done and Mr. Sheffler said no. In the same room were containers of Muriatic acid and bags of ferrous sulfate heptahydrate used to form the solid blocks from the tank bottom sludge.
2. Seven 55-gallon drums were lined up on one side of the room containing the wastewater tanks. Three drums were labeled, “stripper wastes only (no paint waste)”, two labeled, “paint waste (no stripper), and another two seemly empty without label.
3. Five of the 55-gallon drums containing hazardous waste in the storage area had no accumulation start date posted on them.
4. All liquid hazardous waste drums were kept in storage without containment.
5. Weekly inspection of the hazardous waste drums were not performed nor was record made available to MDE at the time of the inspection. Mr. Sheffler confirmed he is unaware of it.
6. Facility has no assigned EPA Identification number (notification of ownership and name change was not done)
7. Universal waste (UW) is not managed at the facility as Mr. Sheffler stated that used lamps are generally disposed in the trash as solid waste.
8. Aerosol cans containing hazardous waste are disposed in the trash as solid waste.
9. Paint cans with remnant of solvent based paints were disposed in trash as solid waste.

## Violations

Based on the findings of this inspection, MDE has determined that Hagerstown Aircraft Services is in violation of Code of Maryland Regulations (COMAR) for Controlled Hazardous Substance (CHS). The specific violations are:

- Storage of CHS on-site for over 90 days without permit in violation of Environment Article, Section 7-224, COMAR 26.13.07.01A, and COMAR 26.13.03.05E(1).

Specifically, the facility did not meet the following required conditions:

- 1) COMAR 26.13.03.02A – Waste determination was not performed;
- 2) COMAR 26.13.03.05E (1) (e) – The date upon which each period of accumulation begins was not clearly marked and visible on each container at 90-day storage area
- 3) COMAR 26.13.03.01 – Generator storage of CHS without permit;
- 4) COMAR 26.13.05.09H – No Containment for liquid CHS containers;
- 5) COMAR 26.13.05.09E – Inspection for hazardous waste in less than 90 days storage is not performed on a weekly basis;
- 6) COMAR 26.13.03.05E (1) (f) (ii) – Hazardous waste containers were not labeled or clearly marked with words “Hazardous Waste”.
- 7) COMAR 26.13.03.03A – No assigned EPA Identification number
- 8) COMAR 26.13.10.15A & B – Universal waste (UW) is not properly managed in a way that prevents releases in to the environment.

### Remarks

The above violations included some of those listed in the joint EPA and MDE inspection conducted on April 28<sup>th</sup>, 2010. EPA was the lead agency for the inspection.

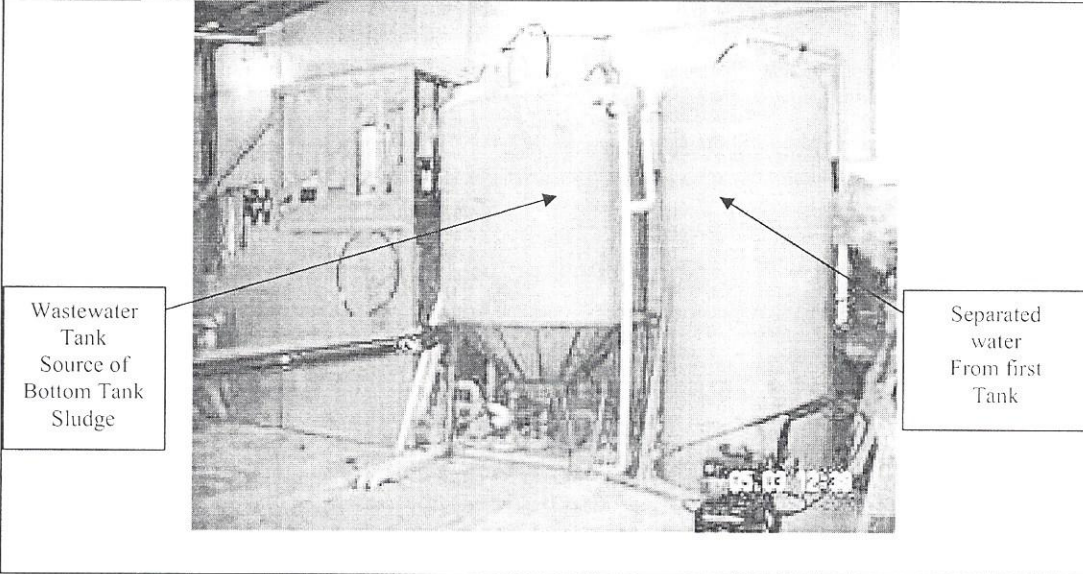
## Conclusion

The inspection ended with a post-inspection meeting with Mr. Andy Shanholtz. MDE briefed him on the violations observed and requested immediate correction actions taken to return to full compliance. MDE issued a Site Complaint, number *SC-O-13-HAZ-153* with specifics of the violations and requested immediate corrective measures and return of the facility to full compliance.

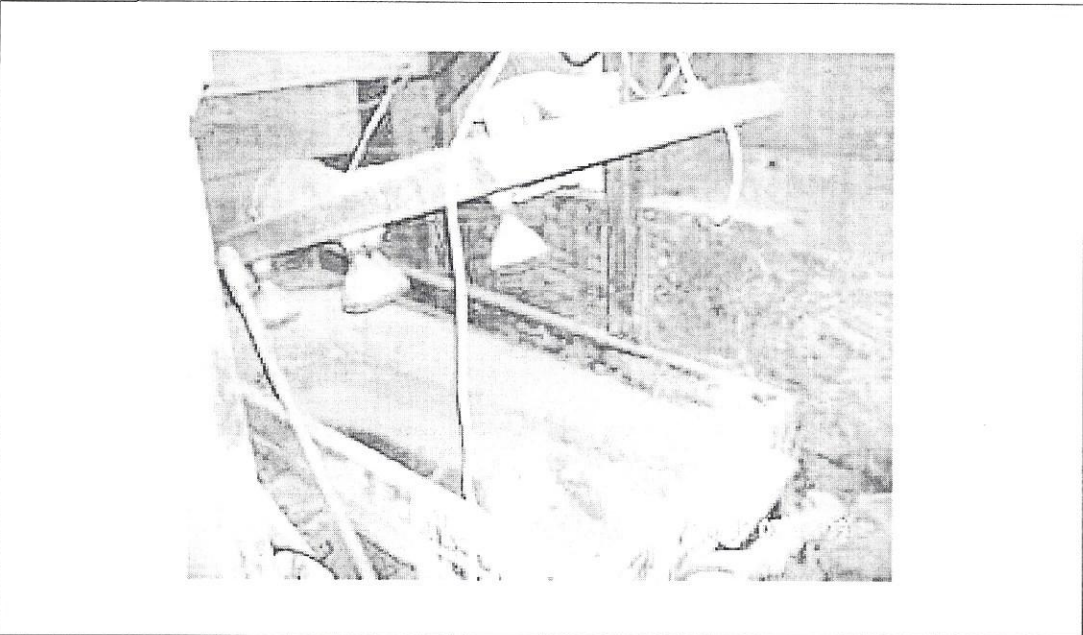
Report by: Anthony N. Enweze, Inspector  
Solid Waste Enforcement Program  
Hazardous Waste Activities

**Maryland Department of the Environment (MDE)  
Hazardous Waste Program  
Official Photograph Sheet**

<b>Location:</b>	14235 Oak Springs Road, Hagerstown in Washington County						
<b>Photographer:</b>	Anthony N. Enweze			<b>Witness:</b>			
<b>Photo #</b>	1	of	4	<b>Date:</b>	5/03/2013	<b>Time:</b>	12:38 PM
<b>Description:</b>	Wastewater collection and separation Tanks						

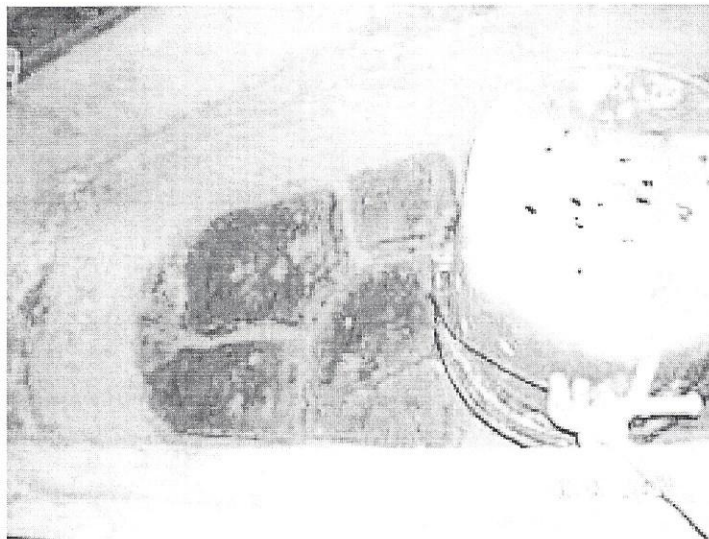


<b>Description:</b>	Sludge Treatment into Solid Blocks before Disposal as Municipal Waste
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**Maryland Department of the Environment (MDE)  
Hazardous Waste Program  
Official Photograph Sheet**

<b>Location:</b>	14235 Oak Springs Road, Hagerstown in Washington County						
<b>Photographer:</b>	Anthony N. Enweze			<b>Witness:</b>	None		
<b>Photo #</b>	2	of	4	<b>Date:</b>	5/03/2013	<b>Time:</b>	12:39
<b>Description:</b>	Solid Blocks of Sludge after Treatment						



<b>Description:</b>	Muriatic Acid and Ferrous Heptahydrate used for Sludge Treatment
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**Maryland Department of the Environment (MDE)  
Hazardous Waste Program  
Official Photograph Sheet**

<b>Location:</b>	14235 Oak Springs Road, Hagerstown in Washington County						
<b>Photographer:</b>	Anthony N. Enweze			<b>Witness:</b>	None		
<b>Photo #</b>	3	of	4	<b>Date:</b>	5/03/2013	<b>Time:</b>	12:50
<b>Description:</b>	Hazardous Waste Drums at the less than 90-day Storage Area						



<b>Description:</b>	Close up pictures of one each, Stripper and Paint Waste
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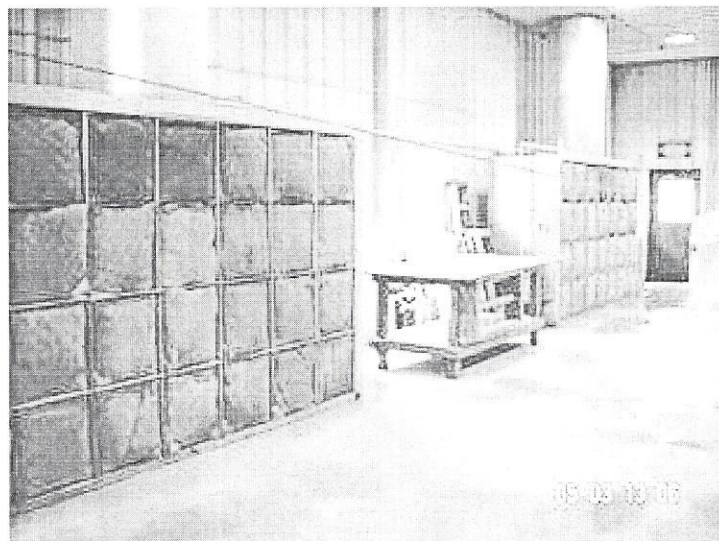


**Maryland Department of the Environment (MDE)  
Hazardous Waste Program  
Official Photograph Sheet**

<b>Location:</b>	14235 Oak Springs Road, Hagerstown in Washington County						
<b>Photographer:</b>	Anthony N. Enweze			<b>Witness:</b>	None		
<b>Photo #</b>	4	of	4	<b>Date:</b>	5/03/2013	<b>Time:</b>	3:00 PM
<b>Description:</b>	Paint containing cans disposed in Trash as municipal waste						



<b>Description:</b>	Two Large Size Filters in the Paint Booth Area
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**County:** Washington  
**Site Contact:** Kim Potter  
**Title:** Owner/Operator      **Phone #:** (301) 733-7604  
**Inspection Type:** CEI-On-Site      **Activity #:**  
**Inspection Start Date:** June 26<sup>th</sup>, 2013  
**End Date:** June 26<sup>th</sup>, 2013  
**MDE Lead Inspector:** Anthony Enweze  
**Other Inspector:** Paul Sudano

Documentation

<input checked="" type="checkbox"/> Photos/Videos taken	<input type="checkbox"/> Other documentation
<input type="checkbox"/> Documents obtained from facility	<input type="checkbox"/> Request for submission of documents
<input type="checkbox"/> Samples taken by outside source	<input type="checkbox"/> Samples taken by the Department

**Checklist:**       Generator       TSD Facility

Introduction

On June 26<sup>th</sup>, 2013, Maryland Department of the Environment (MDE) visited the facility to conduct a follow-up inspection. Mr. Paul Sudano and I of MDE arrived at the facility on June 26, 2013 at 11:55 AM. We met with Ms. Kim Porter, the facility owner, staff consultant, Andy Shanholtz, and Keith Sheffler, HAS operation Manager and we held a pre-inspection meeting. I explained to the team that MDE visit at the facility is to follow-up on progress made in corrective actions on violations observed from May 3<sup>rd</sup>, 2013 inspection. Shortly after discussion, Mr. Sheffler left us with Ms. Potter and Mr. Shanholtz to lead us through the inspection process.

Before the facility tour, I reviewed the hazardous waste generator notification package I brought with me to enable the facility file for name change from Alphin Aircraft to Hagerstown Aircraft Services. Mr. Shanholtz completed the form and handed it back to me for return to MDE operational services program.

Review and observation of outstanding issues

Mr. Sudano and I went through the facility and reviews and observed:

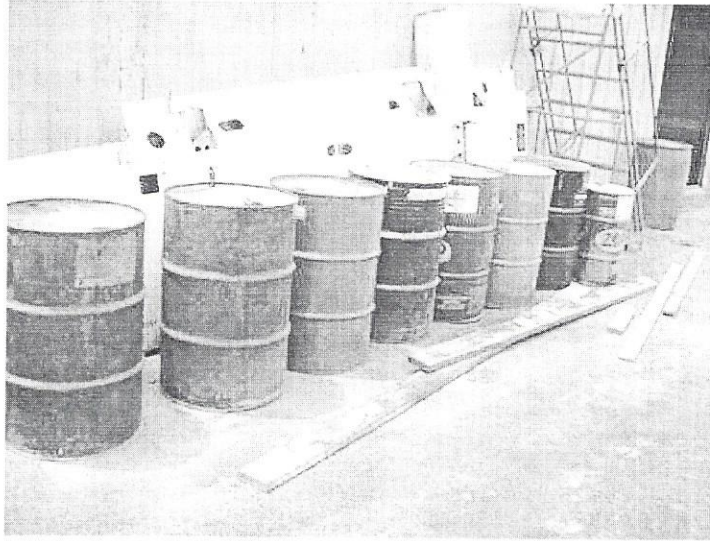
1. The weekly inspection log for the less than 90-day storage is yet to be put in place and Mr. Shanholtz stated that the correction is in progress and will be complete within a day.
2. The contingency plan preparation was in progress and to be complete within two weeks.
3. Labels and accumulation start date are to be placed on containers. Mr. Shanholtz stated that Safety Kleen, hire contractor service is expected to be at the facility the next day, Thursday, June 27, 2013 to help in the corrective action measures.
4. Aerosol and universal waste containers (drum and boxes) were purchased to be used for the collection of the waste before disposal.
5. 55-gallon drums containing unknown material were being characterized and will be completed by Safety Kleen the next day according to Mr. Shanholtz.
6. Several 55-gallon containing hazardous waste observed during May 3<sup>rd</sup>, 2013 inspection were removed and disposed by Safety Kleen.
7. The stripper waste/recycling system was ready for dismantle pending the electrician disconnecting the unit from power source, according to Mr. Shanholtz.

### **Conclusion**

The inspection ended with a post-inspection meeting. Ms. Potter and Mr. Shanholtz were informed of MDE intention to come back for another follow-up inspection to observe the corrective measures taken to return the facility to compliance.

**Maryland Department of the Environment (MDE)  
Hazardous Waste Program  
Official Photograph Sheet**

<b>Location:</b>	14235 Oak Springs Road, Hagerstown in Washington County						
<b>Photographer:</b>	Anthony N. Enweze			<b>Witness:</b>			
<b>Photo #</b>	1	of	4	<b>Date:</b>	6/26/2013	<b>Time:</b>	
<b>Description:</b>	Drums containing small amount of material awaiting characterization						



<b>Description:</b>	Sludge from recycler for waste determination
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**Maryland Department of the Environment (MDE)  
Hazardous Waste Program  
Official Photograph Sheet**

<b>Location:</b>	14235 Oak Springs Road, Hagerstown in Washington County						
<b>Photographer:</b>	Anthony N. Enweze			<b>Witness:</b>	None		
<b>Photo #</b>	2	of	4	<b>Date:</b>	6/26/2013	<b>Time:</b>	
<b>Description:</b>	Universal Waste Boxes						



<b>Description:</b>	Waste Drum awaiting characterization
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# CONTINGENCY PLAN

HAGERSTOWN AIRCRAFT SERVICES, INC

14235 OAK SPRINGS ROAD

HAGERSTOWN, MD 21742

This plan is reviewed annually and amended whenever changes occur that will significantly affect the ability of this facility to respond to an emergency situation. This includes revision of the regulations, if the plan fails in an emergency, if this facility changes in a way that materially increases the potential for an emergency or changes in the response necessary in an emergency, if the list of emergency coordinators changes or if the list of emergency equipment changes. When warranted, revisions are made to the plan within 24 hours.

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Page revision date \_\_\_\_\_

1. General Facility Information

Hagerstown Aircraft Services, Inc

Facility Name

Kimberly A. Potter

Facility Owner/Operator

14235 Oak Springs Road – Hagerstown, MD 21742

Physical Address

Washington County, Maryland

County

14235 Oak Springs Road – Hagerstown, MD 21742

Mailing Address

301-733-7604                      301-739-0527

Facility Telephone              Facility Fax

MDD042682398

EPA Identification Number

SIC/NAICS Code

Alan Shanholtz                      301-733-7604

Contingency Plan Development and Maintenance Coordinator

2. Purpose and Scope of Plan

Although this facility is designed, constructed, maintained and operated in a manner that minimizes the possibility for emergency incidents such as fire, explosions and any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil or surface water, this plan is designed to minimize hazards to human health and the environment in the unlikely event of such incidents.

3. Overview of Facility Operations, Wastes, and Processes Generating Wastes

The operations at HAS involve general maintenance of aircraft. This includes structural repair, engine repair, painting and general maintenance. Listed below are the types of hazardous waste generated at HAS:

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#### **4. Emergency Response Coordinator**

At all times there must be at least one employee either on the facility premises or on-call to respond to an emergency by coordinating all emergency response measures.

The Emergency Response Coordinator (or alternate) has full authority to commit resources needed to Respond to emergencies at this facility and to direct other trained employees to assist in the implementation of this contingency plan.

A list of emergency response coordinator (s), first aid and spill response team is included in Appendix A.

A list of available emergency equipment and capabilities and location is included in Appendix B.

#### **Name of Fire and Emergency Protection**

Listed below are the local fire departments, police department, and hospital.

**1. Hagerstown Regional Airport Fire Dept.**

18434 Showalter Road

Hagerstown, MD 21742

Telephone 240-313-2777 Dial 911 for emergencies

**2. Maugansville Fire Dept**

13730 Maugansville Road 21767

Maugansville, MD 21767

(301) 739-8515 Dial 911 for emergencies

**3. Hagerstown City Police**

50 N. Burhans Blvd.

Hagerstown, Md 21740

301-791-2371



4. Maryland State Policy – Barack O – Hagerstown

18345 Col. Henry K. Douglas Drive

Hagerstown, MD 21740

301-739-2101 (request for police)

301-766-3800 (all other calls)

5. Meritus Health

1116 Medical Campus Road

Hagerstown, MD 21742

301-790-8000

## 5. Evacuation Plans

If an emergency should occur we will make the necessary announcement informing all employees to evacuate the buildings. All employees will report to the designated safe area. This area is the entrance gate of HAS. (see attached building diagrams)

-Immediately after an emergency, provide cleanup, treatment, storage and/or disposal of recovered waste, contaminated soil or surface water, and other material that results from the by:

-Ensure all wastes are managed and disposed of in accordance with federal, state and local requirements;

-Ensure that no waste incompatible with the released material is processed until cleanup procedures are completed;

-Ensure that all emergency equipment is cleaned and fit for its intended use before operations are resumed;

-Coordinate with federal, state, and/or local regulatory agencies to determine that appropriate response actions have been successfully completed and terminate emergency response;

-Provide details of the incident to the Owner/Operator and notify them when emergency response has terminated and that all emergency equipment is ready for use.

Appendix A – List of Emergency Response Team Members

<u>Name</u>	<u>Address</u>	<u>Phone (wk)</u>	<u>Phone (hm or cell)</u>
Alan Shanholtz	14235 Oak Springs Rd Hagerstown, MD	301-733-7604	717-729-2862

**Primary Emergency Response Coordinator (Required)**

<u>Kim Potter</u>	<u>14235 Oak Springs Rd Hagerstown, MD</u>	<u>301-733-7604</u>	<u>301-667-0755</u>
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**Alternate Emergency Response Coordinator 1**

(Designation of spill response teams and first aid specialists is optional)

<u>Name</u>	<u>Phone</u>
<u>Alan Shanholtz</u>	<u>301-733-7604</u>

**Spill Response Team Leader**

<u>Kim Potter</u>	<u>301-733-7604</u>
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**Alternate Spill Response Team Leader 1**

<u>Name</u>	<u>Phone</u>
<u>Kim Potter</u>	<u>301-733-7604</u>

**First Aid Specialist**

<u>Gina Mills</u>	<u>301-733-7604</u>
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**First Aid Specialist**

## Appendix B – List and location of Emergency Equipment

This is an up-to-date list of all emergency response equipment at the facility. All equipment is tested and maintained as necessary to assure its proper operation in time of emergency.

<u>Equipment</u>	<u>Location</u>	<u>Description</u>	<u>Capabilities</u>
Internal Comm. System	Building 1	Intercom System	Use this to notify all employees of emergency
Fire Control equip	Parts Room	Fire Extinguisher 2	
	Sheet Metal Shop	Fire Extinguisher 5	
	Avionics	Fire Extinguisher 1	
	Engine Shop	Fire Extinguisher 2	
	Maintenance shop	Fire Extinguisher 2	
	Paint shop	Fire Extinguisher 2	
	Strip Shop	Fire Extinguisher 2	

Appendix C – Fire Protection and Prevention Plan

-This facility is within an established fire protection district

Hagerstown Regional Airport Fire Dept.

18434 Showalter Road

Hagerstown, MD 21742

Telephone 240-313-2777

Dial 911 for emergencies

Maugansville Vol. Fire Dept

13730 Maugansville Rd.

Maugansville, MD 21767

(301) 739-8515

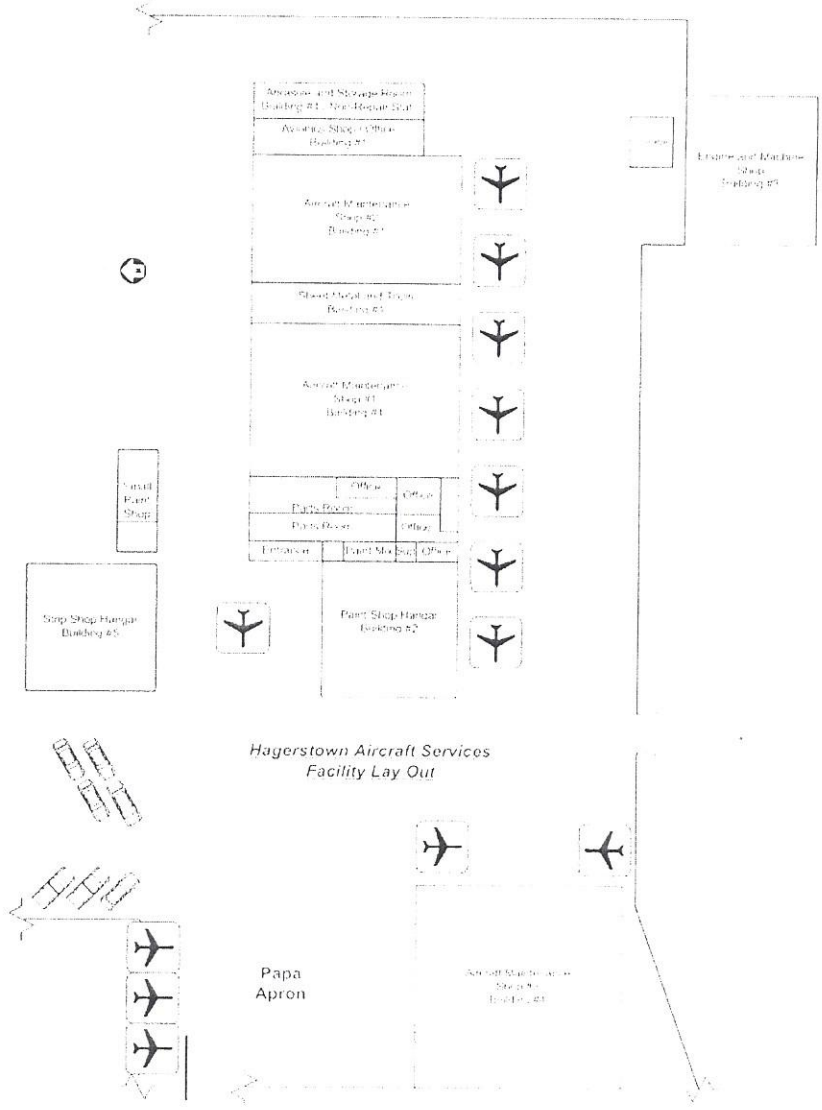
Dial 911 for emergencies

## Appendix D – Evacuation Diagrams

See attached

# HAGERSTOWN AIRCRAFT SERVICES INC RERAIR STATION AND QUALITY CONTROL MANUALS

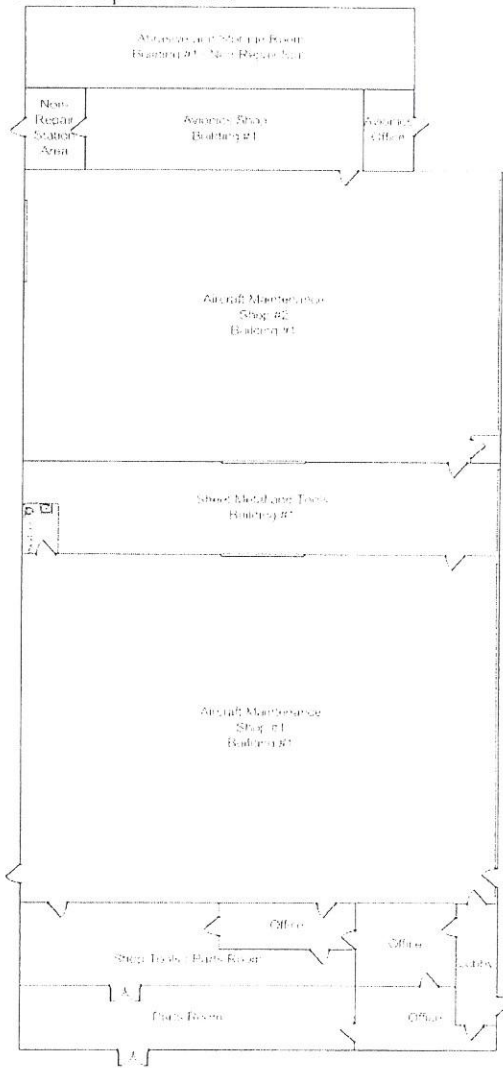
- Facilities Layout



Revision Number	1
Revision Date	November 30, 2010
Original Issue Date	February 9, 2004

# HAGERSTOWN AIRCRAFT SERVICES INC RERAIR STATION AND QUALITY CONTROL MANUALS

- Building # 1: main offices, (2) maintenance hangars, sheet metal shop, parts rooms, and avionics shop and office

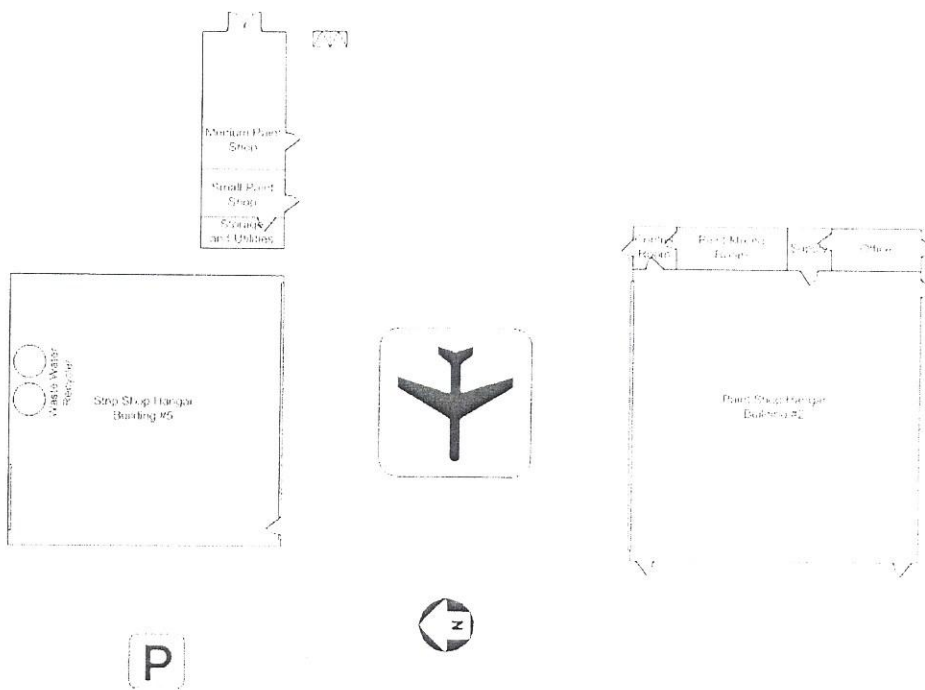


Revision Number	1
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HAGERSTOWN AIRCRAFT SERVICES INC RERAIR STATION AND QUALITY CONTROL MANUALS

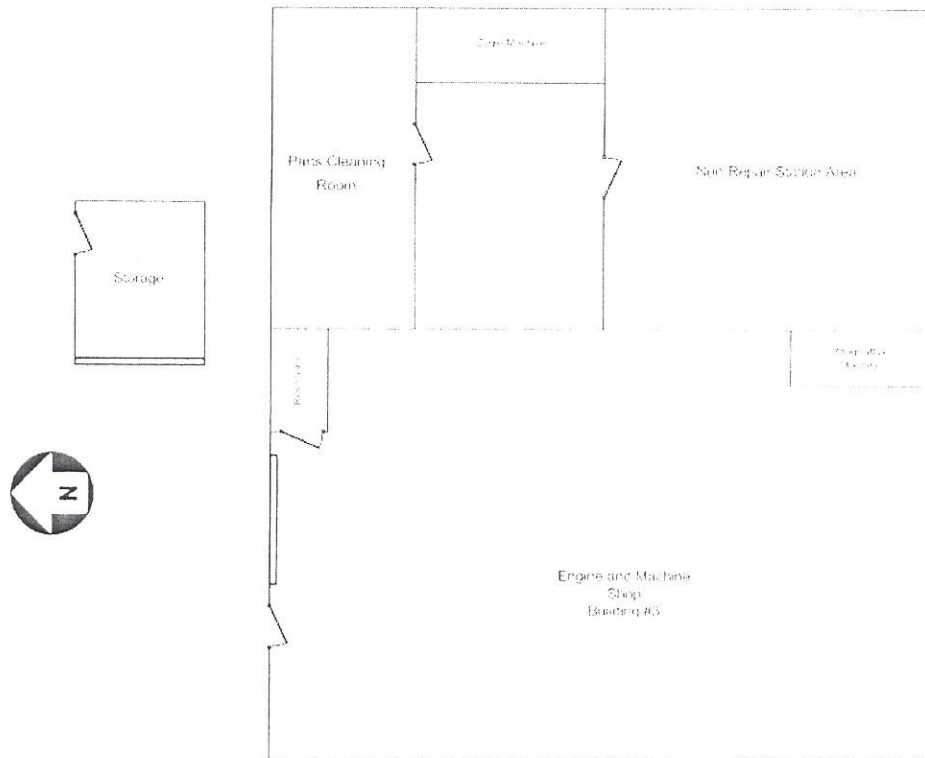
- Buildings #2 and #5: paint shop and stripping shop



Revision Number	1
Revision Date	November 30, 2010
Original Issue Date	February 9, 2004

HAGERSTOWN AIRCRAFT SERVICES INC REPAIR STATION AND QUALITY CONTROL MANUALS

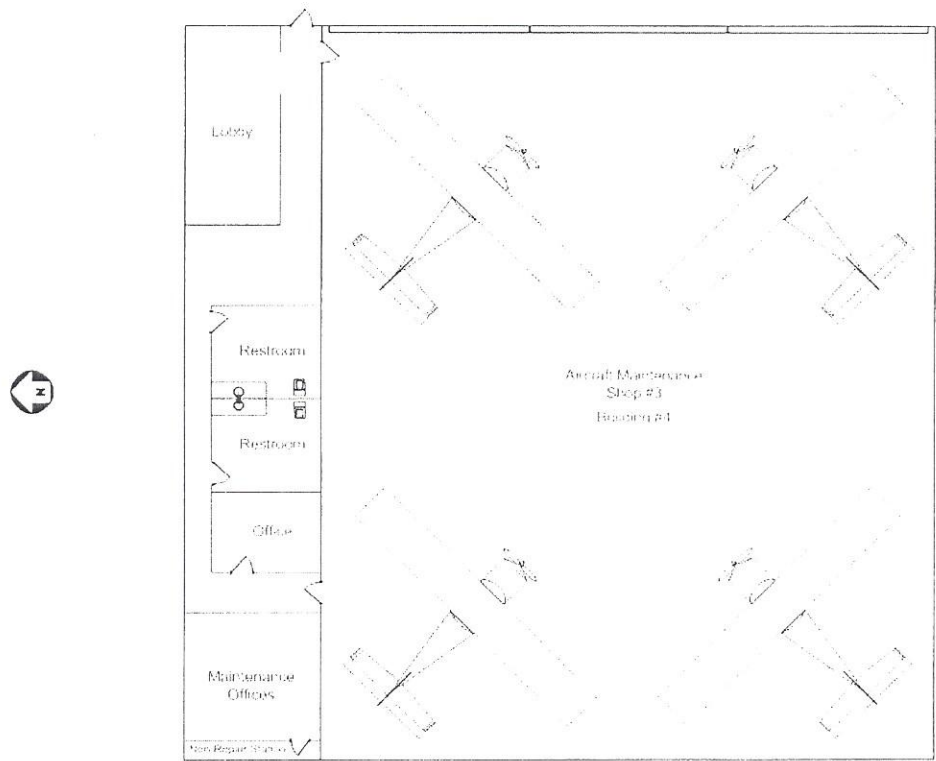
- Building # 3: engine shop



Revision Number	<u>1</u>
Revision Date	<u>November 30, 2010</u>
Original Issue Date	<u>February 9, 2004</u>

HAGERSTOWN AIRCRAFT SERVICES INC RERAIR STATION AND QUALITY CONTROL MANUALS

- Building # 4: maintenance hangar and maintenance office



Revision Number	<u>1</u>
Revision Date	<u>November 30, 2010</u>
Original Issue Date	<u>February 9, 2004</u>

HAGERSTOWN AIRCRAFT SERVICES INC RERAIR STATION AND QUALITY CONTROL MANUALS

- avionics shop and avionics office.



Revision Number	<u>1</u>
Revision Date	<u>November 30, 2010</u>
Original Issue Date	<u>February 9, 2004</u>



# AFFORDABLE SAFETY TRAINING

SAFETY DOESN'T HAVE TO BE EXPENSIVE!

## Hazard Communication Program

### Affordable Safety Training

is committed to providing businesses with safety solutions that are reliable, effective, and inexpensive. Our products are carefully designed to meet the needs of our customers. The contents are clear, concise, and easy to customize to your business.

### **Satisfaction is guaranteed!**

With Affordable Safety Training, *safety doesn't have to be expensive.*

Valued Customer,

Thank you for selecting Affordable Safety Training safety solutions for your business. This OSHA Compliant Program will provide the structure for your company's Hazard Communication Program. Please follow these simple instructions:

1. Review the OSHA Regulations on Hazard Communication.

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10099](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10099)

2. Review our Hazard Communication Program template. Update the Grey Marked Fields with information that is specific to your company,
3. Review your program. Do not be afraid to make slight modifications to make it more applicable to your business.

### ***Need Training Materials?***

Affordable Safety Training has a wide selection of training materials for your business.

Check them out at  
[Affordable  
SafetyTraining.com](http://AffordableSafetyTraining.com).

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