

Hazard Communication Program

1. Purpose

The purpose of this program is to inform interested persons, including employees, that our company is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training our employees.

This program applies to all work operations at World Stone and Tile, LLC where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements.

Cynthia Straky, the Hazard Communication Program Coordinator, has overall responsibility for the program, including to review and update the program, as necessary. Copies of this written program may be obtained from Cynthia Straky who keeps the program inside the SDS binder located at the front desk. Moreover, all employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical inventory list from Cynthia Straky.

Finally, if after reading this program, you find that improvements can be made, please contact Cynthia Straky. We encourage all suggestions because we are committed to the success of our written Hazard Communication Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

2. Definitions

Chemical	Any substance or mixture of substances.
Container	Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
Foreseeable emergency	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	Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.
Mixture	A combination or a solution composed of two or more substances in which they do not react.

Non-routine tasks	Tasks which do not occur on a frequent basis or are not identified as a normal production task.
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3. List of Hazardous Chemicals

Our "chemical inventory" is a list of product identifiers of hazardous chemicals known to be present at our workplace. Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the chemical inventory can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of other chemicals may require an actual survey of the workplace.

Cary Misenaar and Cynthia Straky update the hazardous chemical inventory as necessary. As chemicals arrive to our facility at 23640 Industrial Park Dr. in Farmington Hills, MI employees will acquire the SDS sheets and immediately take these sheets to the front office to Cary Misenaar or Cynthia Straky so the chemical inventory and SDS binder can be updated and remain current at all times.

The inventory is attached to this written Hazard Communication Program (Appendix A). However, the Program Coordinator also keeps a copy of the chemical inventory list located in the SDS binder where it is accessible during work hours. The chemical inventory serves as a list of every hazardous chemical for which an SDS must be maintained.

4. Safety Data Sheets (SDSs)

SDSs are basically fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas. Cary Misenaar is responsible for obtaining and maintaining the SDSs at our workplace and will contact the chemical manufacturer or vendor if additional chemical information is needed. All new procurements for the company must be cleared by Cynthia Straky.

SDSs are kept readily accessible to all employees during each work shift at the following location(s): SDS binder on the front desk countertop. Employees may obtain access to them by: walking up to the front office and grabbing the SDS binder off of the countertop at the front desk to review the SDSs.

The procedure followed if the SDS is not received with the first shipment is as follows:

We determine whether an SDS for the chemical was already sent with a previous shipment. If so, no further action to obtain an SDS is required. If an SDS was not already sent, we determine whether or not an SDS is required based on whether the chemical falls under 29 CFR 1910.1200, Hazard Communication.

If an SDS is not required, then no further action to obtain an SDS is required. If an SDS is required, we complete, copy, and send a letter to the chemical manufacturer, importer, or distributor requesting an SDS for the chemical. We file the copy of the letter in our Hazard Communication Program binder for documentation purposes. If the SDS is received, we supply a copy at all SDS stations.

After 30 days, if the SDS has not been received, we will call the manufacture to obtain the SDS. If the SDS is still not received after an additional 15 days, we will contact MIOSHA for assistance in obtaining an SDS.

5. Labels and Other Forms of Warning

In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged, or marked in accordance with the Hazard Communication Standard, either with:

- The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s) or
- The product identifier and words, pictures, symbols, or combination thereof, which provide at least "general" information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the Hazard Communication Program, will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.

While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking because shipped containers of hazardous chemicals must bear this information. Hazards not otherwise classified, if any, do not have to be addressed on a container but must be addressed on the SDS.

Because the product identifier is found on the label, the SDS, and our chemical inventory, the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number. Employees should be aware that label information can be verified by referring to the corresponding SDS.

Cynthia Straky is responsible for ensuring that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are legible, in English (although other languages may also be included), and displayed clearly on the container or readily available in the work area throughout each work shift, as required. Cynthia Straky will update labels, as necessary. Cynthia Straky also ensures that newly purchased chemicals are checked for labels when containers are received.

Cynthia Straky is responsible for ensuring the proper labeling, tagging, or marking of any shipped containers leaving the workplace. These labels, tags, or marks must provide not only the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s) but also the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

If employees transfer chemicals from a labeled container to a portable, secondary container that is intended only for their IMMEDIATE use, no labels, tags, or markings are required on the portable container. Otherwise portable containers must be labeled, tagged, or marked in accordance with our in-house labeling system for workplace containers.

Finally, the following procedures are used to review and update label information, when necessary, to ensure that labels that fall off or become unreadable are immediately replaced:

To check for labels on incoming containers:

We check to see that all incoming hazardous chemical containers are labeled with the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s).

To obtain a proper label when not received with a shipment:

If an incoming container is not labeled properly or is missing a label, we determine whether or not a label is required based on 29 CFR 1910.1200, Hazard Communication. If a label is required, we either send the shipment back with the transporter to the distributor, importer, or manufacturer or store the chemical until it can be labeled. If the chemical will be stored, we store it in a locked storage area so non-management employees do not have access to use it. After storing the chemical we will complete, copy, and send a letter to the chemical manufacturer, importer, or distributor requesting a label for the chemical. We file the copy of the letter in the Hazard Communication Program binder for documentation purposes. If the label is received, we affix the label to the container. After 30 days, if the label has not been received, then we contact MIOSHA for assistance in obtaining a label.

To relabel or dispose of chemical containers upon discovery:

When a chemical container is discovered with a label that is soiled, unreadable, or missing, we instruct employees not to move, touch, or use the chemical. We determine whether or not a label is required based on 29 CFR 1910.1200, Hazard Communication. If a label is required, we attempt to identify the chemical. If the chemical can be identified, we re-label the container with an extra label provided by the chemical distributor or manufacturer or store the chemical until it can be labeled with a label ordered from the manufacturer, importer, or distributor. If the chemical will be stored, we store it in a locked storage area so non-management employees do not have access to use it. After storing the chemical we will complete, copy, and send a letter to the chemical manufacturer, importer, or distributor requesting a label for the chemical. We file the copy of the letter in the Hazard Communication Program binder for documentation purposes. If the label is received, we affix the label to the container.

After 30 days, if the label has not been received, then we contact MIOSHA for assistance in obtaining a label. If the label cannot be obtained from the chemical manufacturer, importer, or distributor, and no other labeling options are available, we dispose of the chemical according to the chemical's safety data sheet and other proper federal, state, and local disposal requirements.

6. Pictograms and Hazards

<p>Health Hazard</p>  <p>Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity</p>	<p>Flame</p>  <p>Flammables Pyrophorics Self-Heating Emits Flammable Gas Self-Reactives Organic Peroxides</p>	<p>Exclamation Mark</p>  <p>Irritant (skin and eye) Skin Sensitizer Acute Toxicity Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non-Mandatory)</p>
<p>Gas Cylinder</p>  <p>Gases Under Pressure</p>	<p>Corrosion</p>  <p>Skin Corrosion/Burns Eye Damage Corrosive to Metals</p>	<p>Exploding Bomb</p>  <p>Explosives Self-Reactives Organic Peroxides</p>
<p>Flame Over Circle</p>  <p>Oxidizers</p>	<p>Environment (Non-Mandatory)</p>  <p>Aquatic Toxicity</p>	<p>Skull and Crossbones</p>  <p>Acute Toxicity (fatal or toxic)</p>

7. Training of Employees

Everyone who works with or is potentially "exposed" to hazardous chemicals on the job will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals before starting work. "Exposure" means that "an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (accidental or possible) exposure." Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided. All training is conducted by World Stone and Tile, LLC or a designated outside vendor.

Effective information and training is a critical part of the Hazard Communication Program. We train our employees to read and understand the information on labels and SDSs, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas, as well as ways to protect

themselves. Our goal is to ensure employees know that they are exposed to hazardous chemicals, have the skills to read and use labels and SDSs, and understand how to appropriately follow the protective measures we have established. We urge our employees to ask Cynthia Straky or a manager questions for greater comprehension.

As part of the assessment of the training program, World Stone and Tile, LLC asks for input from employees regarding the training they have received and their suggestions for improvement. In this way, we hope to reduce any incidence of chemical-related illness or injury. World Stone and Tile, LLC classifies any employee who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies as employees who need training. Employees such as office workers who encounter hazardous chemicals only in non-routine, isolated instances do not require training.

8. Training Content

Employees receive training only on those chemicals/chemical hazards to which they are exposed during the course of doing their jobs. Employees are trained on hazard categories such as flammability or carcinogenicity. Chemical-specific information will always be available through labels and access to safety data sheets. The format of the training program used is audiovisual materials, classroom instruction, quizzes and learning assessment handouts.

The training program emphasizes these elements:

- Summary of the Hazard Communication Standard.
- What hazardous chemicals are present in employee work areas during operating hours.
- Chemical and physical properties of hazardous chemicals and how to detect the presence or release of these chemicals.
- Physical hazards of chemicals (potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.
- Procedures to protect against hazards and exposure.
- Procedures for reporting and responding to chemical emergencies.
- How to read and use both the workplace labeling system and labels received on shipped containers.
- The order of information found on SDSs, how to read the information, and what it means.
- How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

The procedure to train new employees at the time of their initial assignment is (before a job opening is filled) to determine the exposures involved in that job (based on job descriptions and job location), including whether that position involves any hazardous chemical exposure in the work area.

If a job opening involves any hazardous chemical exposure under normal operating conditions or in foreseeable emergencies, we identify the new or transfer employee as one who needs hazard communication training. As soon as the first day is scheduled for a new or transfer employee, we make arrangements with Cynthia Straky to schedule a hazard communication training session to ensure that employees who need the training, receive it prior to their initial assignment to work with or near hazardous chemicals. World Stone and Tile, LLC or a designated outside vendor will present these trainings according to specifications in our Hazard Communication Program. We document all hazard communication training using training logs and certifications, and file this documentation in employee files and our Hazard Communication binder.

We train employees when a new hazard is introduced by determining what new exposures will be involved for employees who will work with or near the new or changed process, procedure, control measure, machine, production area, or exposure hazard. If a new or changed process, procedure, control measure, machine, production area, or exposure hazard involves a hazardous chemical exposure under normal operating conditions or in foreseeable emergencies, we identify the employees who will need hazard communication re-training.

We make arrangements with Cynthia Straky to schedule (a) hazard communication re-training session(s) to ensure that employees who need training receive it prior to their initial assignment to work with or near the new hazardous chemical exposure. World Stone and Tile, LLC or a designated outside vendor will present these trainings according to specifications in our Hazard Communication Program. We document all hazard communication training and re-training using training logs and certifications and file this documentation in employee files and our Hazard Communications binder.

9. Hazards of Unlabeled Pipes

Work activities are sometimes performed by employees in areas where hazardous chemicals are transferred through unlabeled pipes. We inform employees of the hazards of chemicals contained in unlabeled pipes in their work areas by having Cary Misener determine and document the following items: location, chemical in pipes, potential hazards, safety precautions, and methods to detect presence of chemical.

Cary Misener ensures that all chemicals in unlabeled pipes are listed on the chemical inventory. Prior to work in areas where chemicals are transferred through unlabeled pipes, employees must contact Cynthia Straky to schedule unlabeled piping training. Prior to work in these areas, Cynthia Straky presents information to the affected employees about the chemical(s) in pipes, potential hazards, safety precautions, and methods to detect the presence of chemicals.

10. Notification to Visitors and Contractors of Hazardous Chemicals

To ensure that outside visitors and contractors work safely in our facility and to protect our employees from chemicals used by outside contractors, the following information will be given to and received from the contractor:

- Hazardous substances, to which they may be exposed while on the job site as well as substances they will be bringing into the workplace. We will provide contractors with information on our labeling system and access to SDSs.
- Precautions and protective measures the employees may take to minimize the possibility of exposure.

Any Safety Data Sheets submitted by contractors will be received, reviewed and retained by Cynthia Straky.

11. Additional Information

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the Hazard Communication Standard, applicable SDSs, and the chemical inventory from Cynthia Straky at any time. All employees also have the right to view, read and otherwise look at the SDS binder, the chemical inventory list as well as this Hazard Communication Program.

12. Important Phone Numbers

Agency/Company	Phone #:
<i>Local Emergency</i>	911
<i>CHEMTREC</i>	1-800-424-9300
<i>Poison Control</i>	1-800-222-1222
<i>Farmington Hills Police Dept. (Non-Emergency)</i>	248-871-2600
<i>Farmington Hills Fire Dept. HQ (Non-Emergency)</i>	248-871-2800
<i>MIOSHA Toll Free</i>	1-800-866-4674
<i>MIOSHA Fatalities/Catastrophes</i>	1-800-858-0397
<i>MIOSHA Severe Injury</i>	1-844-464-6742
<i>Beaumont Hospital - Farmington Hills</i>	248-471-8000

13. Appendix A (Chemical Inventory)

We have attached to this written program our chemical inventory as of 11/28/2017.

CHEMICAL INVENTORY LIST

World Stone and Tile, LLC

Released: 11/28/2017

Chemical Hazard Name:	Date SDS Revised:
Ager	6/29/2015
Cera T Wax	7/7/2015
E-Z Flow Burn-in Stick White	1/29/2009
Genius	7/1/2008
Hardener Paste White Phthalate - Free	1/22/2014
Klane-DT	9/21/2009
Klean Strip Acetone	5/24/2017
Klean Strip Denatured Alcohol	4/13/2015
New ManglaMacchia	5/17/2013
OSR (Oil Stain Remover)	n/a
Plantinum Premium Epoxy Adhesive Clear	9/24/2014
Quartz Surface Enhancer	n/a
Quick Tac 2	9/3/2015
Rival 100% Silicone	3/10/2015
Rival Coloring Paste - Buff	6/1/2015
Rival Coloring Paste - Ochre	6/1/2015
Rival Penetrating	6/1/2015
Rival Transparent Flowing	6/1/2015
Rival Transparent Knife Grade	6/1/2015
RP, SI, FS, HT, MG Series	5/1/2015
Rust Remover	5/1/2015
Spider Black	1/22/2014
Spider Clear	1/22/2014
Superior Ice	3/23/2009
Uniblack1	7/7/2015
VOC Compliant Solvent	1/13/2009
White Cream Hdnr 250	n/a