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THE REINALT-THOMAS CORPORATION

Hazard Communication Program

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1 Policy Scope

1.1 Purpose

The objective of this policy is to provide a written hazard communication program that meets OSHA standard 1910.1200 for the company.

1.2 Policy Applicability

This policy provides requirements for labeling, safety data sheets, communication of information and training. This policy applies to all Company locations that have hazardous chemicals in the workplace.

1.3 Policy Implementation

Given the Company's implementation process for Hazard Communication, the implementation of the program will occur over a period of time as resources are made available.

2 Policy Roles & Responsibilities

2.1 Safety Department

The Safety Department is responsible for the development and documentation of this policy. The Safety Department:

- Formulates, finalizes and ensures publication of the Hazard Communication policy.
- Evaluates requested changes to this policy and obtains approval for any updates.
- Provides advice to the Company on the Hazard Communication program.
- Communicates regularly with and provides education and training opportunities for all employees to inform them of decisions and changes to the program.
- Conducts annual evaluation of this program.

2.2 Operations

Operations is responsible for implementation, execution, and ensuring compliance of the Hazard Communication Program. Responsibilities include:

- Provide the time, tools and resources necessary to implement this program and for ensuring that the provisions in this program are being followed.
- Oversee compliance with the Hazard Communication Program.
- Communicate Program requirements to employees and ascertain their compliance with the Program.

3 Safety Data Sheets

3.1 Hazardous Chemicals

Every product used in any Company location containing chemicals considered hazardous by the Globally Harmonized System of Classification and Labeling of Chemicals shall have a safety data sheet.

A list of approved hazardous chemicals shall be established and maintained by the Safety Department.

3.2 Location of Safety Data Sheets

Safety data sheets shall be stored and maintained electronically in a database by SDS Pro.

Safety data sheets shall be readily accessible by computer in the workplace through the Knowledge Center.

The Company shall obtain a safety data sheet from the manufacturer as soon as possible if a safety data sheet is not provided with the purchase or delivery of a new product.

3.3 Safety Data Sheets Format

Safety data sheets shall use the Globally Harmonized System of Classification and Labelling of Chemicals format.

4 Workplace Labels

4.1 Containers

Each container of hazardous chemicals in the workplace shall be labeled, tagged or marked with a product identifier, words, pictures, symbols or combination thereof which provide at least general information regarding the hazards of the chemicals.

No employee is permitted to remove or deface existing labels on incoming containers of hazardous chemicals.

Workplace labels shall be in English and prominently displayed on the container. Employees who speak other languages may add the information in their language to the material presented.

5 Employee Training and Information

5.1 Employee Information

At the time of initial assignment and whenever a new chemical is introduced, employees shall receive information on the following:

- An overview of the requirements contained in the Hazard Communication Standard
- In operations in their work area where hazardous chemicals are present:
 - Repair area
 - Balancer
 - Tire Changer
 - Service Bay
- Location and availability of the Company's written hazard communication program, the company list of hazardous chemicals, and safety data sheets

5.2 Employee Training

At the time of initial assignment and whenever a new chemical is introduced, employees shall receive training on the following:

1. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
 - a. Visual indication of open container or substance on skin or substance spill
 - b. Smell of strong chemicals
 - c. Residue on hands
2. Physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area.
 - a. Flammability of chemicals
 - b. Health hazards of chemicals in repair area
 - c. Health hazards of cleaning chemicals
 - d. Health hazards of maintenance chemicals
3. The measures employees can take to protect themselves from these hazards, including specific procedures the Company has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
 - a. Work practices
 - i. Do not inhale any vapors
 - ii. Avoid eye and skin contact

- iii. Wash hands and other exposed areas after use
- iv. Do not eat or drink when using chemicals
- v. Do not expose to flame

b. Emergency procedures

- i. For first aid measures, see Section 4 on the SDS
- ii. For medical emergencies, call the 24-hour line located on the SDS

c. Personal protective equipment

- i. Wear nitrile or latex gloves during use
- ii. Dispose of gloves after use
- iii. Wear eye protection
- iv. Remove contaminated clothing or gloves

4. The details of this hazard communication program, including an explanation of the labels on shipped containers and the workplace labeling system used, the safety data sheet; including the order of information and how employees may obtain and use the appropriate hazard information.

- a. The written program lays out procedures for the following parts:
 - i. Safety data sheets
 - ii. Labeling
 - iii. Employee training and information
- b. Safety data sheets
 - i. What safety data sheets are
 - ii. Purpose of safety data sheets
 - iii. Where to find and access safety data sheets
 - iv. How to use safety data sheets
- c. Labeling
 - i. The labeling system, required by OSHA, follows a new standard so everyone can recognize the hazards in the container regardless of workplace.
 - ii. The company shall adopt the labels provided on containers as received from the manufacturer and make no alterations. Do not remove or deface labels.
 - iii. Spray bottles shall be designated

6 Assurance

6.1 Audit/Inspection

6.1.1 Key Performance Indicator

Items	Criteria	Points
SDS: <ul style="list-style-type: none"> • Every employee knows how to access SDS • Inventory of chemicals is consistent with approved list 	Each line item = 10	X/20
Labeling: <ul style="list-style-type: none"> • All labels are present on every container • All labels are legible on every container • All labels are consistent with GHS standards 	Each line item = 5	X/15
Training and Information: <ul style="list-style-type: none"> • Training Course Completed • Survey Completion • Feedback Completion • GHS Poster 	Each line item = 10	X/40
Total Score, Hazard Communication Score		X/75

6.2 Tracking and Reporting

The Safety Department shall track progress on the engagement of the program through:

1. Surveys received on pertinent Safety Focus documents posted on the Knowledge Center
2. Feedback received on pertinent Safety Focus documents posted on the Knowledge Center
3. Surveys acknowledging receipt of Safety Focus documents

The Safety Department shall report to regional representatives (at a realistic interval given current capabilities) store/location progress on the program.

Appendix A – List of Chemicals

List of Chemicals approved for use: updated 02-23-2023

Chemicals Classified as Hazardous	
1	Prep & Stick (Wheel Cleaner & Wheel Weight Surface Prep)
2	Zep Concentrated Glass Cleaner
3	Zep TKO Hand Cleaner
4	Discount Tire Cleaner (DT-491F Pre-Buff Cleaner)
5	Discount Tire Quick Dry Patch Cement (DT-7362)
6	Discount Tire Repair Sealer (DT-76F)
7	Corrosion X
8	Corrosion X Heavy Duty
9	Discount Tire Penetrant (DT-40)
10	Dyken Brite-Mark - Black
11	Discount Tire Bead Sealer (DT-507F)
12	Discount Tire Universal Mounting Paste (DT-75)
13	Liquid Wrench Hydraulic Jack Oil (DT-823)
14	Marvel Air Tool Oil
15	PROMAR 200 Zero VOC Interior Latex Gloss, Extra White (Sherwin Williams)
16	A100 Exterior Acrylic Latex Flat, Extra White (Sherwin Williams)
17	GermSafe Disinfectant
18	Clorox Regular Bleach
19	WD-40 Multi-Use Product
20	Zep Antibacterial Disinfectant & Cleaner

Chemicals Not Classified as Hazardous	
21	GoJo All Purpose Skin Cleaner (Hand Soap)
22	Bubble Check
23	Rema Tire Repair Materials (Tire Shine)
24	Zep Glove Skin Protectant
25	Paintstik Original B