

Function of Beauty 5570 Snyderstown Rd. Paxinos, PA 17824

# **HAZARDOUS COMMUNICATIONS PROGRAM**

## 1.0 Introduction

- 1.1 Function, Inc is committed to providing its employees with a safe and healthy workplace.
- 1.2 Function's Hazard Communication (HazCom) Standard is an integral part of the safety efforts. Its purpose is to provide information to employees, contingent workers, and contractors about the hazardous chemicals they may work with or around. Once informed, employees are expected to take an active role in protecting themselves from such hazards.
- 1.3 This standard provides the minimum requirements to ensure compliance with Function's Hazardous Communication (HazCom) Standard and regional regulatory Hazard Communication standard(s) under OSHA [1910.1200].
- 1.4 In order to ensure chemical safety in the workplace, information about the identities and hazards of the chemicals must be available and understandable to workers. Function Inc requires the development and dissemination of such information:
  - 1.4.1 Chemical manufacturers and importers are required to evaluate the hazards of the chemicals they produce or import, and prepare labels and safety data sheets to convey the hazard information to their downstream customers.
  - 1.4.2 All employers with hazardous chemicals in their workplaces must have labels and safety data sheets for their employees with and around various chemicals, and train them to safely recognize the potential hazards of those chemicals.

## 2.0 Scope

- 2.1 This standard applies to all employees and facilities that are a part of Function, Inc including contingent workers, visitors, and contractors. This standard is intended to ensure employee safety by maintaining full compliance to Function's Policy and regional regulatory requirements.
- 2.2 This standard covers:
  - 2.2.1 Labels and other forms of warnings
  - 2.2.2 Globally Harmonized System Hazard Pictograms
  - 2.2.3 Safety Data Sheets (SDS).
- 2.3 Employee information and training This standard is applicable to all Function employees, to all work conducted under the authority of Function, and to all equipment and property managed by Function.
  - 2.3.1 Non-Function personnel will follow the provisions of this standard while at Function facilities.

2.4 Hazard communication requirements are applicable to acquisition and disposal of property that contains (or contained) hazardous materials.

### 3.0 Definitions

- 3.1 **Absorption:** The movement of hazardous chemicals through the skin or lung tissue into the bloodstream.
- 3.2 **Acute:** Effects usually occur rapidly as a result of short-term exposures and are of short duration.
- 3.3 **Boiling Point:** The temperature at which liquid boils at atmospheric pressure.
- 3.4 **Carcinogen:** A chemical is considered to be a carcinogen if:
  - 3.4.1 It has been evaluated by the Internal Agency for Research on Cancer to be a carcinogen or potential carcinogen: or
  - 3.4.2 It is listed as a carcinogen or potential carcinogen in the Annual Report on Carcinogens published by the National Toxicology Program (NTP) (latest edition): or
  - 3.4.3 It is regulated by OSHA as a carcinogen.
- 3.5 **Chemical Name:** The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS).
- 3.6 **Chronic:** A long term effect: low-level exposure over long periods gives a rise to symptoms that develop over time.
- 3.7 **Combustible liquid** means any liquid having a flashpoint at or above 100 °.F (37.8 °.C), but below 200 °.F (93.3 °.C), except any mixture having components with flashpoints of 200 °.F (93.3 °.C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.
- 3.8 **Common Name:** Any designation or identification such as a trade name, brand name or generic name used to identify a chemical other than by its chemical name.
- 3.9 **Compressed gas** means: (i) A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70° F (21.1° C); or (ii) A gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130 °.F (54.4° C) regardless of the pressure at 70° F (21.1° C); or (iii) A liquid having a vapor pressure exceeding 40 psi at 100° F (37.8° C) as determined by ASTM D-323-72.
- 3.10 **Container** means 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.
- 3.11 **Corrosive:** A chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact.. Corrosive materials usually have either a very low pH (acids) or a very high

- pH (bases). Strong bases are usually more corrosive than acids. Examples of corrosive materials are sodium hydroxide (lye) and sulfuric acid.
- 3.12 **Danger:** A signal word for severe hazards. It is important to be extremely careful because of the higher level of hazards.
- 3.13 **Employee** means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.
- 3.14 **Employer** means a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.
- 3.15 **Explosive** means a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.
- 3.16 **Exposure or exposed** means that an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)
- 3.17 **Flammable:** Material that will burn when ignited. Separated into the separate categories:
- 3.17.1 **Aerosol, flammable** means an aerosol that, when tested by the method described in 16 CFR 1500.45, yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any °degree of valve opening;
- 3.17.2 **Gas, flammable** means: (A) A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or (B) A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit;
- 3.17.3 **Liquid, flammable** means any liquid having a flashpoint below 100°F (37.8° C), except any mixture having components with flashpoints of 100° F (37.8° C) or higher, the total of which make up 99 percent or more of the total volume of the mixture.
- 3.17.4 **Solid, flammable** means a solid, other than a blasting agent or explosive as defined in Sec. 1910.109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered to be a flammable solid if, when tested by the method described in 16 CFR 1500.44, it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

- 3.18 **Flashpoint** means the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when tested as follows: Tagliabue Closed Tester (see American National Standard Method of Test for Flash Point by Tag Closed Tester, ZI 1-24-1979, ASTM D 56-79) for liquids with a viscosity of less than 45 Saybolt Universal Seconds (SUS) at 100°F (37.8°C), that do not contain suspended solids and do not have a tendency to form a surface film under test; or Pensky-Martens Closed Tester (see American National Standard Method of Test for Flash Point by Pensky-Martens Closed Tester, ZI 1.7-1979, ASTM D93-79) for liquids with a viscosity equal to or greater than 45 SUS at 100°F (37.8°C), or that contain suspended solids, or that have a tendency to form a surface film under test; or Setaflash Closed Tester (see American National Standard Method of Test for Flash Point by Setaflash Closed Tester, ASTM D 3278-79). Organic peroxides, which undergo auto accelerating thermal decomposition, are excluded from any of the flashpoint determination methods specified above.
- 3.19 **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.
- 3.20 **Globally Harmonized System (GHS):** A worldwide effort by the United Nations to have common ways to describe chemicals and how to use them safely. With GHS, chemical labels and Safety Data Sheets from manufacturers in many countries will offer the same information in the same format.
- 3.21 **Hazardous Category:** The level of hazard severity within a hazard class, e.g., a Category 1 substance will be more hazardous than a Category 2.
- 3.22 **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.
- 3.23 **Hazardous Class:** The nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.
- 3.24 **Hazard Statement:** Describes what kinds of hazards this chemical has such as its flammability, what may happen if it comes in contact with skin, and the effects it can have if it is inhaled.
- 3.25 **Hazard Warning** means any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s). (See the definitions for "physical hazard" and "health hazard" to determine the hazards which must be covered.)
- 3.26 **Health Hazard:** A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur

- in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.
- 3.27 **Hepatotoxins:** Chemicals which produce liver damage.
- 3.28 **Identity** means any chemical or common name which is indicated on the SDS for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the SDS.
- 3.29 **Ingestion:** To take in by swallowing.
- 3.30 **Inhalation:** To take in by breathing.
- 3.31 **Immediate use** means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- 3.32 **Label** means any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.
- 3.33 **Label elements:** the specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category
- 3.34 **Mixture** means any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.
- 3.35 **Nephrotoxins:** Chemicals which produce kidney damage.
- 3.36 **Neurotoxins:** Chemicals which produce their primary toxic effects on the nervous systems.
- 3.37 **Organic peroxides:** Thermally unstable substances or mixtures which may undergo exothermic self-accelerating decomposition and may have one or more of the following properties:
- 3.37.1 *Liable to explosive decomposition*
  - 3.37.2 *Burn rapidly*
  - 3.37.3 *Be sensitive to impact or friction*
  - 3.37.4 *React dangerously with other substances*
- 3.38 **Oxidizer** means a chemical other than a blasting agent or explosive that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.
- 3.39 **Physical hazard** : a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.
- 3.40 **Pictogram:** an image or symbol that conveys specific information about the hazard of a chemical. There are eight pictograms that designate different hazard categories that affect human health and safety and one pictogram that represents environmental hazards.

- 3.41 **Precautionary Statement:** A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a chemical or improper storage or handling.
- 3.42 **Produce** means to manufacture, process, formulate, blend, extract, generate, emit, or repackage.
- 3.43 **Product Identifier:** The name or number used for a hazardous chemical on a label or in the Safety Data Sheet to help the user identify the chemical.
- 3.44 **Pyrophoric** means a chemical that will ignite spontaneously in air at a temperature of 130° F (54.4° C) or below.
- 3.45 **Reactivity:** The ability of a material to undergo a reaction, releasing energy or heat.
- 3.46 **Responsible party** means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.
- 3.47 **Safety Data Sheet (SDS):** an informational form detailing the chemical and physical properties, hazards, and ways of safely handling a toxic chemical.
- 3.48 **Signal Words:** A word on the product label used to indicate the severity level of a hazard. There are two signal words: “Warning” and “Danger”. “Danger” is used for the more severe hazards. “Warning” is used for the less severe hazards.
- 3.49 **Specific chemical identity** means the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.
- 3.50 **Threshold Limit Values (TLV's)** are guidelines (**not** standards) prepared by the American Conference of Governmental Industrial Hygienists, Inc (ACGIH) to assist industrial hygienists in making decisions regarding safe levels of exposure to various hazards found in the workplace. A TLV reflects the level of exposure that the typical worker can experience without an unreasonable risk of disease or injury.
- 3.51 **Treatment, storage and disposal facility (TSDF):** A facility permitted to treat, store and dispose of hazardous waste received from generators. For U.S. based facilities, must be US EPA – state or local certified and have a fully executed agreement with Function Inc.. (*Contact EH&S for an approved Environmental Vendors list.*) The facility must be approved by the local authority in the region, who is permitted to transport, store, treat or dispose of the hazardous wastes.
- 3.52 **Toxicity:** The degree of injury or illness caused by a poisonous material.
- 3.53 **Trade secret** means any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.

- 3.54 **Unstable (reactive)** means a chemical which in the pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure or temperature.
- 3.55 **Use** means to package, handle, react, emit, extract, generate as a byproduct, or transfer. Water-reactive means a chemical that reacts with water to release a gas that is either flammable or presents a health hazard.
- 3.56 **Warning:** A signal word; meaning to be careful and take recommended safety precautions.
- 3.57 **Work area** means a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.
- 3.58 **Workplace** means an establishment, job site, or project, at one geographical location containing one or more work areas.

#### 4.0 Responsibility

- 4.1 Leaderships responsibility with support or assistance from EHS:
  - 4.1.1 Determine the most effective way to perform the job, safely utilize the hazardous material and minimize the injury/illness potential from improper use.
  - 4.1.2 Communicate right-to-know knowledge to employees using the approved method and, through training, improve employee safe job skills and knowledge.
  - 4.1.3 Ensure employees follow the prescribed work practices for hazardous materials and comply with safety rules and procedures pertaining to those products as documented in this program.
  - 4.1.4 Implement corrective actions for non-compliance with this program.
  - 4.1.5 Provide oversight of the HazCom policy, standard and site specific program to supervisors and personnel who utilize hazardous materials.
  - 4.1.6 Ensure HazCom training is provided to employees and training documentation is maintained, as required.
  - 4.1.7 Review proposed operations and/or operating procedures for the use of hazardous materials.
  - 4.1.8 Provide oversight of chemical procurements which may involve the acquisition of hazardous materials. Responsibility in this area also resides with the Chemical Review Committee.
  - 4.1.9 Ensure that SDSs (as hard copies or electronic files) are available for all hazardous chemicals in the work area, stored or in use, during all shifts.



- 4.1.10 Ensure that chemical label content meets regional regulations and that primary and secondary hazardous chemical containers are properly labeled.
- 4.1.11 Ensure that employees receive timely and appropriate general and task specific hazard communication training.
- 4.1.12 Ensure that training is provided when a new chemical is introduced into the workplace or when there is a substantial change in chemical usage or work practices.
- 4.1.13 Ensure that information concerning hazardous materials acquired by the facility is made available to all affected employees, and contractors.
- 4.1.14 Provide technical and regulatory support (including reports reviews), training assistance or consultation as required or requested.
- 4.1.15 Update the online system whenever a new chemical has been approved for use.
- 4.2 Employee Responsibility – (Function employees and contingent employees)
  - 4.2.1 Must attend required HazCom training.
  - 4.2.2 Read and understand the SDS for each hazardous material that the employee will handle or may be exposed to at work.
  - 4.2.3 Follow the protective measures specified in the SDS for material handling and use of personal protective equipment.
  - 4.2.4 Follow all site procedures for acquisition, labeling, storage, and handling of hazardous materials.
  - 4.2.5 In the event of exposure to a hazardous material, follow established facility procedures for reporting exposures and/or injuries to trained emergency personnel and medical care providers / first aiders.

## **5.0 Safety Data Sheets**

The manufacturer's SDS and other relevant documentation must be obtained by the user (before acquisition of any hazardous material) and sent to the EHS Director and the VP of Operations of the facility for review and approval.

### **5.1 SDS File Locations**

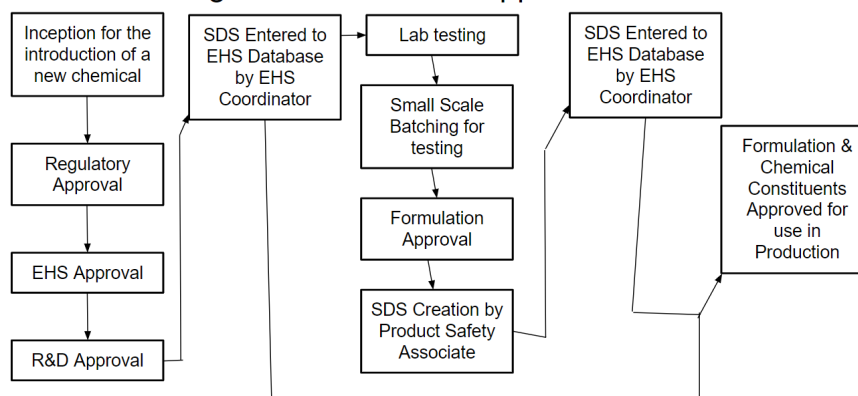
- 5.1.1 The primary resource for SDS information is on the online system. Electronic copies of SDS are available to employees at any time by clicking on the icon on the desktop of the SDS Computer. The SDS computer must be accessible at all times to all employees.
- 5.1.2 The Safety Specialist is responsible for updating the electronic files.

## 5.2 SDS List

5.2.1 A list of all hazardous chemicals must be maintained and updated at least on an annual basis during the physical inventory review. The list must contain the identification of the chemical exactly as it appears on the SDS.

### 5.2.2

Workflow Diagram for Chemical Approvals



5.2.3 See also: **FOB-EHS-007-01 Safety Data Sheet Program**

## 5.3 Format

5.3.1 The following information must be provided:  
SDS Sections

1. Identification
2. Hazard(s) identification
3. Composition / information on ingredients
4. First-aid measures
5. Fire-fighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/ personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information including last revision

## 5.4 Labeling

5.4.1 Each workplace container of hazardous material must be labeled, tagged, or marked to identify the material and to provide appropriate warnings. Alternative methods such as signs, placards, process sheets, and operating procedures are acceptable for individual stationary process containers, as long as the information is conveyed to all affected persons. All chemical labeling must follow the following rules:

5.4.1.1 All containers must be properly labeled.

- 5.4.1.2 Worn, torn or damaged labels must be replaced.
- 5.4.1.3 Labels must be GHS compliant.
- 5.4.2 GHS Labels require:
  - 5.4.2.1 Product Identifier
  - 5.4.2.2 Pictogram
  - 5.4.2.3 Hazard Statement
  - 5.4.2.4 Signal Word
  - 5.4.2.5 Other Information
- 5.4.3 GHS Pictograms:



Explosives



Flammables



Oxidisers



Gases Under Pressure



Corrosives



Acute Toxicity



Irritants/Sensitisers/Other Hazards



Specific Toxicity Hazards



Environmental Hazard

## 6.0 General Requirements

The following apply to all chemical containers. At a minimum, the label must identify the chemical and contain the hazard warnings (including target organ effects). The chemical identity provided on the label must be the same as or cross-referenced to the same identifier on the online system. The user shall label all containers to which chemicals may be transferred from the primary container, prior to transfer.

### 6.1.1 Primary Containers

- 6.1.1.1 Properly labeled containers will help inform employees as to a chemical's associated hazards.

Manufacturers' labels are required to list the same trade name as is on the SDS, the manufacturer's name, the health, flammability, reactivity, and personal protective equipment required to work with the product. Employees are required to read the label of every chemical prior to use.

6.1.1.2 Primary Containers must not be used for anything other than the original product provided by the manufacturer.

**6.1.2 Secondary Containers**

6.1.2.1 Secondary containers are those filled, usually by the user, from a bulk/primary container.

6.1.2.2 Since most existing secondary containers hold more than the user needs for his or her shift, the container is required to be labeled.

6.1.2.3 Secondary containers such as jugs, buckets, and spray bottles containing chemicals must be labeled with a GHS compliant label.

**6.1.3** Incoming containers received with defaced or missing labels shall be rejected unless the contents are definitely known and the container is immediately labeled with the appropriate information.

6.1.4 Labels shall not be removed or defaced, and must remain intact.

6.1.5 Labels must be legible, in English, and prominently displayed on the exterior of the container.

6.1.5.1 Preprinted and manufacturers' labels must be revised within three months of receipt of significant new information and before the material is reintroduced into the worksite.

**7.0 Information Management**

7.1.1 Documents

7.1.1.1 Copies of this HazCom Standard and referenced standards are maintained by EH&S personnel and are accessible to employees, contractors, health care providers, and emergency responders. This information must be made available to emergency responders and local agencies as needed.

7.1.1.2 All training documents will be maintained.

7.1.2 Trade Secrets

7.1.2.1 In an emergency, where a treating physician or nurse determines that the specific chemical identity of a hazardous chemical is necessary for emergency or first aid treatment, the manufacturer shall be contacted immediately at the emergency information number provided on the SDS.

7.1.2.2 The manufacturer or importer is required by law to disclose the specific chemical identity of a trade secret chemical, regardless of the existence of a written statement of need for a confidentiality agreement.

7.1.2.3 In a non-emergency situation, the employee, physician, or other person with a need to know a manufacturer's trade secret information may request that information in writing.

7.1.3 Communication in Multi-Employer Workplace

7.1.3.1 Identification of major facility hazardous operations, chemical inventories, and the SDS database are available to contractor employees through EH&S personnel or other designee.

7.1.3.2 An explanation of any labeling system must be provided along with the chemical inventory list, when necessary, in order to prevent exposure to others, operations with hazardous chemicals shall be performed in a labeled and controlled area.

7.1.4 Acquisition of New Hazardous Chemicals

7.1.4.1 The Safety Director and the VP of Operations is involved in the acquisition of new hazardous chemicals. The EHS Director screens requests for all new chemicals for safe use.

**8.0 Training**

8.1 Facility leadership is responsible for ensuring hazard communication training is provided.

8.1.1 New Hire Orientation HazCom Training

8.1.1.1 New employees will receive HazCom training before they begin their job assignments as part of the new hire orientation.

8.1.1.2 Topics to be included, but not limited to, as follows:

Scope and Purpose of the Hazard	Emergency Procedures
Communication Standard	SDS understanding and location
Requirements of the Hazard	The Labeling System
Communication Standard	Methods and observations to be utilized
Location of the Written Policy	to detect the presence or release of
Control of Chemical Hazards – PPE	hazardous chemicals
Procedures to follow if employees are	GHS training (pictograms, SDS, signal
exposed to hazardous chemicals	words, etc...)

8.1.2 General HazCom Refresher Training

8.1.2.1 HazCom Refresher training must be provided to all employees on an annual basis.

8.1.2.2 This can cover any one or more elements of the overall HazCom program.

8.1.2.3 Also, the plant may wish to address a specific issue which falls within the scope of Hazard Communication.

8.1.2.4 Updates can be provided through safety communications and pre-shift daily checklists.

8.1.3 Updated training must be provided whenever:

8.1.3.1 New chemical hazard is introduced to the workplace.

8.1.3.2 New or updated information is received relative to materials used in the workplace (example: new SDS).

8.1.3.3 Chemical use or work practices are changed.

8.1.3.4 Chemical labeling changes (example: GHS)

8.2 Non-Routine Tasks / Pipes

8.2.1 When employees must perform non-routine tasks that involve chemical hazards, it is the lead's/ supervisor's responsibility, with appropriate EHS support as needed, to inform the employees of the chemical hazards, how they can protect themselves from the hazards, and what steps the plant is taking to reduce the hazards.

8.2.2 Work activities also may take place in areas where chemicals are transferred via pipes/ lines.

8.2.2.1 Leadership is responsible to provide chemical hazard awareness training to employees regarding the hazards associated with any pipes containing hazard chemicals in their areas, prior to starting work.

**9.0 Training Documentation / Recordkeeping**

- 9.1.1 All training records shall include the date and time, name of trainer, and outline or summary of topics presented.
- 9.1.2 Training records must be maintained and comply with records retention requirements.
- 9.1.3 In the event of an incident resulting in a chemical exposure and/or injury, prompt reporting to the location Security, Health Services and/or Human Resources department is required so that appropriate treatment can be rendered. Exposure records must be maintained for the duration of employee's employment plus thirty (30) years or regionally relevant requirements.
- 9.1.4 All outdated safety data sheets (SDS) will be archived and maintained indefinitely.

**10.0 Disciplinary**

- 10.1 All employees must abide by this program. In the event an employee is in violation of this policy they will be disciplined according to the progressive disciplinary plan.

**11.0 Document Review and Approval**

- 11.1 **Date Devised:** 4-19-19
- 11.2 **Reviewed Date:** 12-21
- 11.3 **Date Approved:** 12-21
- 11.4 **Approved By:** Ed Nolter, Director, EHS