



HAZARD COMMUNICATION PROGRAM PLAN

2026

General

In order to fulfill its obligation to protect the health and safety of employees, the following hazard communication program plan has been established for LADD to comply with the Occupational Safety and Health Administration (OSHA) standards 29 CFR 1910.1200 and 29 CFR 1926.59. The MIOSHA Occupational Health Standard, Part 430, Hazard Communication, adopts both, as amended, by reference. The hazard communication program plan will be available for review by all employees.

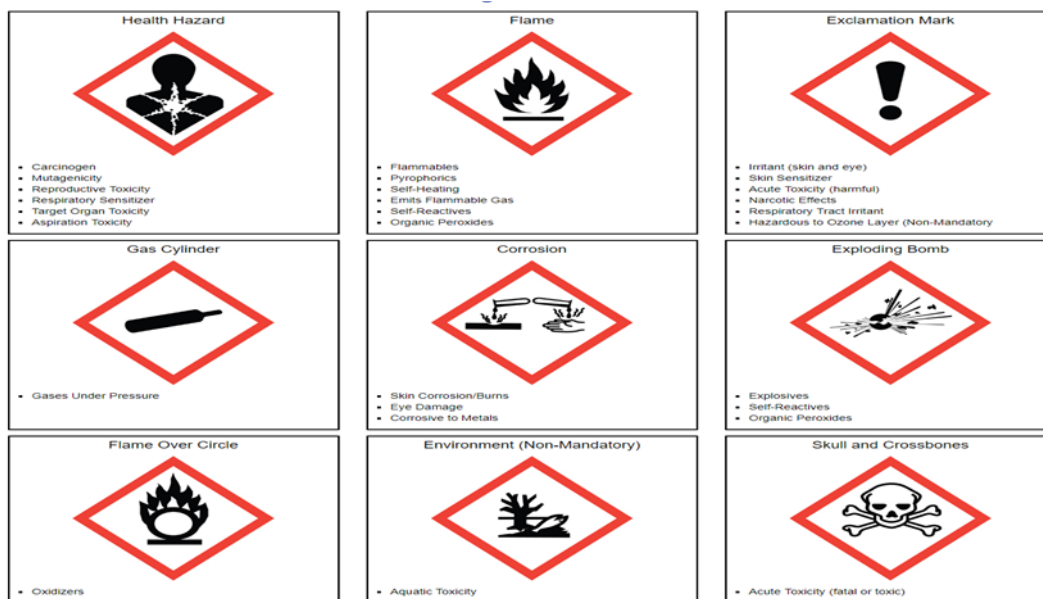
Effective 7/19/24, the Hazard Communication Standard requirements have been updated to align with the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS), primarily Revision 7, and with other U.S. agencies (such as the Department of Transportation) and international trading partners.

Hazard Classification

Chemical manufacturers or importers shall evaluate the chemicals they produce or import to classify the chemicals in accordance with the updated Hazard Communication Standard.

For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that applies to the chemical being classified. The hazard classification shall include any hazards associated with the chemical's intrinsic properties, including:

(A) a change in the chemical's physical form and (B) chemical reaction products associated with known or reasonably anticipated uses or applications. This information will be placed in the Safety Data Sheet (SDS) and on the product label. *All pictograms contain a red, diamond-shaped border.



LADD will rely on SDSs obtained from product suppliers to determine which chemicals are classified as hazardous for employees. SDSs are available at the local office and on the LADD website.

Labeling

A. The Business/Quality Assurance Department will be responsible for seeing that all containers entering the workplace from a manufacturer, importer, or distributor are properly labeled.

B. All labels shall be checked for:

Requirements effective June 1, 2015:	Requirements effective July 19, 2024:
1. Product identifier. 2. Signal word. 3. Hazard statement(s); 4. Pictogram(s); 5. Precautionary statement(s); and, 6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.	1. Product identifier. 2. Signal word. 3. Hazard statement(s); 4. Pictogram(s); 5. Precautionary statement(s); and, 6. Name, U.S. address, and U.S. telephone number of the chemical manufacturer, importer, or other responsible party.

C. The Business/Quality Assurance Department shall not remove or deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information. They shall ensure that workplace labels or other warning signs are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift.

D. Each Office employee and the Services Department employees shall be responsible for ensuring that all secondary containers used in their work area are labeled with the appropriate product identifier and provide employees with specific information regarding the physical and health hazards of the hazardous chemical. If the secondary container requires a label (e.g., if the label falls off), it will be the responsibility of the service location's program manager. The container will be taken out of service until a new label is affixed. No product will be used until it is properly labeled.

The employer will train employees to ensure that each container of hazardous chemicals in the workplace is labeled, tagged, or marked with:

The information specified for labels on shipped containers; **OR, 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 specific information regarding the physical and health hazards of the hazardous chemical. Labels on incoming containers of hazardous chemicals are not removed or defaced.

Safety Data Sheets

The chemical manufacturer or importer preparing the SDS shall ensure that the SDS is in English and includes at least the following section numbers and headings, and associated information under each heading, in the order listed:

Section 1, Identification includes product identifier used on the label; other means of identification; recommended use of the chemical and restrictions on use; chemical manufacturer, importer, or other responsible party U.S. address, U.S. phone number; emergency phone number.

Section 2, Hazard(s) identification includes classification of chemicals; all hazards classified; any hazards not otherwise classified that have been identified during the classification process; and required label elements.

Section 3, Composition/information on ingredients, includes information on chemical substances and mixtures, as well as trade secret claims.

Section 4, First-aid measures, lists the necessary measures, subdivided by route of exposure (inhalation, skin and eye contact, and ingestion), and includes important symptoms/effects (acute and delayed) and required treatment.

Section 5, Fire-fighting measures, lists suitable (and unsuitable) extinguishing media, specific hazards arising from the chemical (e.g., the nature of any hazardous combustion products), equipment, and precautions for fire-fighters.

Section 6, Accidental release measures, lists personal precautions, emergency procedures, protective equipment, and proper methods and materials for containment and cleanup.

Section 7, Handling and storage, outlines precautions for safe handling and storage, including incompatibility considerations.

Section 8, Exposure controls/personal protection, lists OSHA's Permissible Exposure Limits (PELs), Threshold Limit Values (TLVs), and any other exposure limit or range used or recommended by the chemical manufacturer or importer; appropriate engineering controls; and personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists reactivity and chemical stability; the possibility of hazardous reactions, including those associated with foreseeable emergencies; conditions to avoid (e.g., static discharge, shock, or vibration); incompatible materials; and hazardous decomposition products.

Section 11, Toxicological information includes the description of the various toxicological (health) effects and the available data used to identify those effects; routes of exposure (inhalation, ingestion, skin, and eye contact); symptoms related to the physical, chemical, and toxicological characteristics; delayed and immediate effects; chronic effects from short- and long-term exposure; numerical measures of toxicity; interactive effects; whether the hazardous chemical is listed in the National Toxicology Program (NTP) Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in the International Agency for Research on Cancer (IARC) Monographs (latest edition), or by OSHA.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

* Note: Since other Agencies regulate this information, MIOSHA will not be enforcing Sections 12 through 15.

- A. The Business/Quality Improvement Department will be responsible for compiling and maintaining the master SDS file. The file will be kept on the LADD website within the Right to Know book.
- B. Additional copies of SDSs for employee use are located at the local office.
- C. SDSs will be available for review to all employees during each work shift. Copies will be available on request to the Director of Business/Director of Quality Improvement.
- D. Posters identifying the person responsible for maintaining SDSs and where the SDSs are

located are posted on the LADD website, in the service locations' communication logs, and at the local office. Posters notifying employees when new or revised SDSs are received will be located in the same location(s).

- E. If a required SDS is not received, the Director of Business shall contact the supplier, in writing, to request the SDS. If an SDS is not received after two such requests, the Director of Business shall contact the MIOSHA's Construction Safety and Health Division at (517) 284-7680 or the General Industry Safety and Health Division (GISHD) at (517) 284-7750 for assistance in obtaining the SDS. *The MIOSHA program does not maintain a library of SDSs, however the above divisions will assist employees in obtaining copies from an employer or a supplier.*
- F. Safety data sheets shall also be made readily available, upon request, to designated representatives, the Assistant Secretary, and the Director, in accordance with the requirements of § 1910.1020(e)

Employee Information and Training

Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard to which they have not previously been trained is introduced into their work area.

- A. The Human Resources Department shall coordinate and maintain records of employee hazard communication training, including attendance rosters.
- B. Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:

Information:

- The requirements of the MIOSHA Hazard Communication Standard
- All operations in their work area where hazardous chemicals are present
- Location and availability of the written hazard communication program, the list of hazardous chemicals, and the SDS.

Training:

- Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area.
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
- Measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and
- Details of the hazard communication program-- including an explanation of the label elements [product identifier; signal word; hazard statement(s); pictogram(s); and precautionary statement(s)] on shipped containers and the workplace labeling system used by their employer; the SDS format/sections; and, how employees can obtain and use the appropriate hazard information.

- C. The employee shall be informed that:

1. The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
2. As an alternative to requesting an SDS from the employer, the employee can seek assistance from the (MIO)SHA Consultation Education and Training Division (CET) at (517) 284-7720 or the MIO)SHA General Industry Safety and Health Division at (517) 284-7750 to obtain the desired SDS. A sign or MIO)SHA poster will be posted, including the addresses and telephone numbers of the MIO)SHA Divisions responsible for such requests.

- D. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

Multi-Employer Worksites -- Informing Contractors

- A. If our company exposes any employee of another employer to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer:
1. The hazardous chemicals they may encounter.
 2. Measures their employees can take to control or eliminate exposure to hazardous chemicals.
 3. Where applicable, SDSs can be reviewed or obtained.
- B. There is a low risk of our employees' potential exposure to hazardous chemicals brought to a service location by another employer. When this occurs, we will obtain from that employer information on the types of chemicals brought on-site and the measures to be taken to control or eliminate exposure to those chemicals.
- C. It is the responsibility of the Services Department to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. The Services Department will contact the other employer to determine whether any hazardous chemicals will be used, the measures taken to control or eliminate exposure, and, where applicable, whether SDSs can be reviewed or obtained. The risk to LADD employees is low.

List of Hazardous Chemicals

A list of all hazardous chemicals that may be used by LADD is available on the LADD website, along with the SDS sheets, and is also listed below in the Hazard Communication Plan. Further information on any of these chemicals is available in their respective SDSs.

Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list. All surface areas must be cleaned with a household cleaner, and follow-up disinfection is performed with Hepacide Quat II or Chlorine Bleach.

Chemical Inventory List		
Inventory Taken by: Director of Business, Megan Tolar		
Inventory was initially compiled on 01/08/2019 and is updated annually.		
Company: LADD, Inc.		Date of most recent revision: 02/10/26
Phone: 269-782-0654		Direct Supervisor/DOB: Julia Jeffreys
Product/Chemical Name	Maximum Quantity*	Location*
HEPACIDE QUAT II	Unlimited	Service locations/local offices