

# Hazard Communication Procedure

January 2023

This Hazard Communication Procedure has been prepared in compliance with the Hazard Communication Standard issued by the Occupational Safety and Health Administration (OSHA). The Procedure details procedures to be utilized by IPS★ITCS to effectively communicate hazard information to employees using labels, Safety Data Sheets, training Procedures, etc. The purpose of the Procedure is to describe and document in detail the Hazard Communication Procedure.

Since IPS★ITCS often works with Client Controlled Facilities, IPS★ITCS does hereby adopt the clients Hazard Communication Procedure in conjunction with the Procedure.

#### A. Hazard Communication Procedure

- 1. Each job superintendent shall become familiar with the written Hazard Communication Procedure, the inventory of hazardous products, and the location of Safety Data Sheets for the area in which any work is to be performed, prior to beginning any work. This information shall be disseminated to all supervisory personnel and to all employees working in the area prior to beginning work. Means should be developed to ensure that all employees understand and comprehend all aspects of the Hazard Communication Standard. In addition, a hazardous chemical list must be completed, and posted at the job site for employee information. (see Attachment A of this procedure)
- 2. Each superintendent shall be responsible for ensuring that each work site has a written Hazard Communication Procedure in place and in practice for all employees at each jobsite. Section F of this procedure contains a "fill in the blank" Site-Specific Hazard Communication Procedure.
- 3. Each jobsite shall incorporate the client's Hazard Communication Procedure, where one exists, into their safety Procedure. This requires that each superintendent secure a copy of the written Hazard Communication Procedure and all related documents and to maintain these at the jobsite. If a client has not developed a written Hazard Communication Procedure, the superintendent shall insure that the appropriate hazard information is obtained.
- 4. Each work location is required to have a copy of the Hazard Communication Standard at the worksite. The standard, its intent, its implementation, etc., shall be communicated, with documentation, to all Employees.
- 5. Labels, Safety Data Sheets (SDS), and listings of hazards and chemicals are to be thoroughly discussed with all employees with documentation established. Employees shall be informed of the location of all documents, written Procedure, SDS, etc., and how to access these documents. Implementation of employee training is to be documented and maintained.

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#### **B. Employee Training**

All IPS★ITCS employees shall receive training under the standard and should include:

- 1. How the hazard communication Procedure is implemented in that workplace, how to read and interpret information on labels and SDS's, and how employees can obtain and use the available hazard information.
- 2. Employees must be informed of any operations in their work area where hazardous chemicals are present. This includes the required list of hazardous chemicals and Safety Data Sheets.
- 3. The hazards of the chemicals in the work area, both physical hazards health hazards.
- 4. Measures that employees can take to protect themselves from the hazards, including specific procedures the employer has implemented to protect the employee from exposure to hazardous chemicals such as, appropriate work practices, emergency procedures and personal protective equipment.
- 5. Specific procedures put into effect by the employer to provide protection such as work practices and the use of personal protective equipment.
- 6. Methods and observations, such as visual appearance or smell which workers can use to detect the presence of hazardous chemicals they may be exposed to or in the work areas.
- 7. The location and availability of the client and IPS★ITCS written Hazard Communication Procedure and associated SDS Sheets.

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#### C. Labeling

- The IPS★ITCS superintendent must ensure that labels on incoming containers of chemicals are not removed or defaced. They must also receive and maintain copies of SDS's for sealed containers of hazardous chemicals and make them readily accessible to employees.
- 2. IPS★ITCS shall only employ persons who can read, write, and speak English; therefore, all signs and labels shall be in English.
- 3. Examples of the different labelling systems used by IPS★ITCS

PPE Pictograms						
	Work Boots		Safety Glasses			
(FY)	Hard Hat	(3)	Mono Goggles			
	Half Mask Respirator		Dust Mask			
	Gloves / Hand Protection		PAPR – Powered Air Purifying Respirator			
	Face Shield		Fresh Air Respirator			
	FRC	<b>*</b>	SCBA – Self Contained Breathing Apparatus			
	Fall Protection					

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Hazardous to ozone



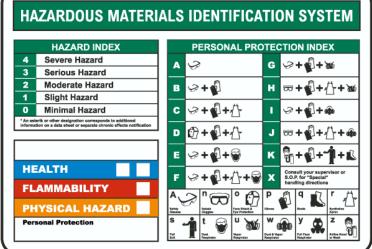




CAUTION

Aspiration toxicity

Organic peroxides





Federal Motor Carrier
Safety Administration
U.S. Department of Transportation www.fmcsa.dot.gov

#### D. Notification Of Subcontractors

1. The hazard communication standard requires the exchange of hazard information in multi-employer workplaces where exposure to another firm's employees may occur. This will ensure that workers will have sufficient information to protect themselves regardless of which employer uses the hazardous chemicals. IPS★ITCS shall inform all subcontractors as to the hazards present and the contents of IPS★ITCS Hazard Communication policy.

#### E. Safety Data Sheets (SDS)

- Chemical manufacturers and importers must obtain or develop a material safety data sheet for each hazardous chemical they produce or import and must forward these to their customers at the time of initial shipment. The superintendent is required to obtain and maintain an SDS for each hazardous chemical, which they use in their workplace.
- 2. IPS★ITCS must ensure that in all cases the required information (SDS) is provided for each hazardous chemical and is readily accessible during each work shift to employees when they are in their work areas.

#### F. Site Specific Hazard Communication Procedure

#### **GENERAL**

To comply with 29 CFR 1910.1200, the following written Hazard communication Procedure (HCP) is to be implemented for personnel of IPS★ITCS. The originals will be kept on file by Shayne Torrans, HSEQT Manager at 1238 Center Street, Deer Park, Texas 77536. All personnel will use the original. HSEQT Manager will be responsible for ensuring the Procedure is current and enforced. A copy of this Procedure is to be made available to employee(s) upon hiring, and a copy will be supplied to any employee upon request.

HSEQT Manager will be contacted when a copy of the Procedure is needed.

The Procedure will be updated when new chemicals or hazards are introduced into the working environment and reviewed annually.

Procurement Manager will check all chemical purchase requests (PR) to be sure a statement requesting a Material Safety Data Sheet (SDS) appears on the purchase request (PR) before being processed.

#### **CONTAINER LABELING**

Shop Manager/Equipment Manager will be responsible for all containers of hazardous chemicals entering the workplace and will assure that the chemical containers are properly labeled with:

- chemical names.
- hazard warnings; an

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names and address of the manufacturer, importer, or responsible party

No container(s) shall be used until they have been checked by Site Supervisor If the chemical is to be transferred to a separate container, Site Supervisor will ensure that the new container is properly labeled; i.e., that all secondary containers are labeled with an extra copy of the original manufacturer's label or with a generic label which have a block for identity and blocks for the hazard warning. For help with labeling, please contact HSEQT Manager. HSEQT Manager will review the labeling system annually and update as required.

Site Supervisor will ensure that the pipe(s) are labeled and identified properly. Site Supervisor will also inform employees of the hazard associated with chemicals contained in unlabeled pipes within the work areas.

#### SAFETY DATA SHEETS (SDS):

HSEQT Manager will be responsible for obtaining and maintaining the SDS system for IPS★ITCS. HSEQT Manager will review incoming data sheets for new and significant health/safety information and will ensure that the new information is given to the affected employees. Copies of all SDS's will be kept by HSEQT Manager and reviewed annually for accuracy and completeness of each SDS.

The SDS system shall include:

- current master inventory list of all SDS indexed by numerical number to the SDS referenced on the inventory list.
- the identity used on the SDS shall be the same as used on the container label.
- the chemical and common name of all ingredients determined to present a hazard shall appear on all SDS.
- the SDS shall list:
  - the physical and chemical characteristics of the chemical --including vapor pressure, flash point, etc.
  - the fire, explosion, and reactivity hazard(s) of chemical mixture including the boiling point, flash point and auto ignition temperature.
  - health hazards of the chemical mixture including signs and symptoms of exposure and medical conditions recognized as aggravated by exposure with primary routes(s) of entry.
  - permissible exposure limit (PEL) or any other exposure limit used or recommended by the manufacturer, importer, or employer.
  - whether on carcinogen listing (NTP) or has been found to be a potential carcinogen (IARC) listing) or by OSHA.
  - control measures including fire, engineering, personal protective equipment.
  - general precautions for safe handling and use including protective measures during repair and maintenance and

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procedures for clean-up of spills and leaks.

- emergency and first aid procedures.
- date prepared or changed.
- o name, address, telephone numbers of manufacturer, importer, or responsible party to call in an emergency.

The originals will be kept on file by HSEQT Manager -The SDS will also be part of the Procedure for use by employees. Each Site Supervisor will keep a current and up to date copy of the Procedure on file. New chemicals shall not be used until a SDS has been obtained.

#### EMPLOYEE TRAINING AND INFORMATION:

Before starting work, the respective (supervisor/foreman) of a new employee will go over their copy of the HCP and each SDS applicable to their job. (Specify methods to be used, i.e., handout, videotapes, etc.)

Before any new chemical is used, all employees will be informed of its use, will be instructed on safe use, and will be trained on hazards associated with the new chemical. All employees will attend additional training, as appropriate, to review the HCP and SDS. Appropriate library referenced material will also be discussed during the training session(s).

The minimum orientation and training for a new employee is as follows:

- an overview of the requirements contained in the Hazard Communication standard, 29 CFR 1910.1200.
- chemicals present in their workplace operations and this office.
- location and availability of the written HCP.
- physical and health effects of the hazardous chemicals listed on the inventory list of this Procedure.
- methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- how to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment.
- steps taken by IPS★ITCS to lessen or prevent exposure to the chemicals listed on the inventory list.
- emergency procedures to follow if exposed to any chemicals; and
- location of SDS file and location of hazardous inventory list.

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Prior to a new chemical hazard being introduced into any section of the workplace, each new employee will, be given information and training as outlined above and/or as outlined on the attached Employee Training Guidelines by HSEQT Manager who is responsible for ensuring that SDS on the new chemical(s) are available prior to use.

After attending the training class, each employee will sign a form to verify that they attended the training, that the written HCP made available for review, and that they understand the HCP.

Before entering an establishment, HSEQT Manager will ascertain what hazards they may be exposed to and then take appropriate action to protect themselves. If the employee has any question about what protection they need, they will contact HSEQT Manager immediately.

Inventory List of Hazardous Chemicals:

The following is a list of the hazardous chemicals used in this workplace. Further information can be obtained from the SDS attached with this Procedure, from HSEQT Manager. The originals will be kept on file by HSEQT Manager at (1238 Center Street, Deer Park, Texas 77536)

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#### **Chemical Inventory**

Page: 1 of 1Date of inventory: December 2022

**Location:** IPS★ITCS/ITCS Deer Park Office – 1238 Center Street, Deer Park, Texas 77536 **Emergency Contact(s):** Shayne Torrans – 832-640-8367

Emergency Contact(s): Sh	ayne Torrans – 832-64	40-8367	
Chemical name	Common name	Manufacturer	Amt. on hand
3M 7700 Spray Adhesive	Spray Glue	3M	4 Cs – 12ea
Ajax with Bleach	Ajax	Colgate-Palmolive	3ea
Clorox Disinfecting Wipes	Clorox Wipes	Clorox	6ea
Clorox Toilet Bowl Cleaner	Bowl Cleaner	Clorox	3ea
Liquid Antibacterial Soap	Liquid Hand Soap	The Dial Company	2ea
Fast Orange Pumice Lotion	Fast Orange	Permatex	2a
Febreze Fabric Freshener	Febreze	Proctor & Gamble	3ea
Gain Dish Soap	Dish Soap	Proctor & Gamble	1ea
GOJO Hand Cleaner	GOJO	GOJO Company	5ea
Hydrogen Peroxide (H2O2)	Hydrogen Peroxide	Walgreens	3 Cs
Jet Lube - 550	Jet Lube - 550	Jet Lube Inc.	6ea
Konica Minolta Black Toner	Toner	Konica Minolta	4ea
Pine-Sol	Pine-Sol	Clorox	1ea
Lemon Fresh Pine-Sol	Lemon Pine Sol	Clorox	2ea
Liquid Paper	Liquid Paper	Sanford NA	20ea
Marvel Mystery Oil	Marvel Mystery Oil	Marvel Oil Company	17ea
Never Seez	Never Seez	Bostic Findley Inc	4cs
Cleaning Duster	Electronics Air	Office Depot	7ea
Pledge Multi Surface	Pledge Cleaner	S.C. Johnson	2ea
Scrubs Hand Cleaner Towels	Scrubs	TW Dymon	15ea
Mighty Sonic Horn	Signal Horn Propellant	Falcon Safety Products	24ea
Soft Scrub with Bleach	Soft Scrub	The Dial Corporation	4ea
WD-40	WD-40	WD-40 Company	12ea
Windex Glass Cleaner	Windex	S.C. Johnson	4ea
		<u> </u>	

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#### SDS INDEX # HAZARDOUS MATERIAL

In conjunction with the SDS and list of hazardous chemicals, procured by IPS\*ITCS, IPS\*ITCS does here by adopt the list of Hazardous Chemicals of the list is provided with Chemical Inventory Sheet of this Procedure.

#### **NON-ROUTINE TASKS:**

Before any non-routine task is performed, employees shall be advised and/or they must contact HSEQT Manager for special precautions to follow and HSEQT Manager shall inform any other personnel who could be exposed. Examples of non-routine task:

In the event such tasks are required, HSEQT Manager will provide the following information about such activity as it relates to the specific chemicals expected to be encountered:

- specific chemical name(s) and hazard(s).
- protective personal equipment required and safety measures to be taken.
- measures that have been taken to lessen the hazards including ventilation, respirators, presence of other employee(s), and emergency procedures.

#### OTHER PERSONNEL EXPOSURE: (SUBCONTRACTORS)

It will be the responsibility of HSEQT Manager to provide other personnel or outside contractors with the following information as follows:

- hazardous chemicals to which they may be exposed to while in the workplace.
- measures to lessen the possibility of exposure.
- location of SDS for all hazardous chemicals; and
- procedures to follow if they are exposed.

HSEQT Manager will also be responsible for contacting each contractor before work is started to gather and disseminate any information concerning chemical hazards the contractor is bringing into the workplace, and vice versa.

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#### G. HAZARD CATEGORIES FOR COMMON PRODUCTS

	Flammable/	Compressed	Synthetic	Irritant/	Corrosive
	Combustible	Gas	Poison	Dust	
Acetylene	X	X			
Acetone	X		X	X	
Alcohol	Χ		X		
Solvents	^		^		
Asbestos			Х		
Babbitt			X		
Metal			^		
Benzene			X		
Cadmium			Х		
Fumes			^		
Carbon	Х	Х	Х		
Dioxide	,				
Carbon	X	X	Χ		
Monoxide					
Chromium			X	X	X
Cleaners	X			X	
Coal Tar				Х	
Compressed Air	Х			X	
Copper			Х		
Fumes					
Diesel Fuel	X		X	X	
Epoxy Resins	X		Х	X	Х
Fiberglass			X	Χ	
Firebrick			Х		
Formaldehyde			X	Χ	
Form Oil				Χ	
Freon	X		X	Х	

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#### HAZARD CATEGORIES FOR COMMON PRODUCTS (CONTINUED)

	Flammable/	Compressed	Synthetic	Irritant/	Corrosive
	Combustible	Gas	Poison	Dust	
Gasoline	Х		Х	Х	
Glass Fiber				X	
Glues	Х		X		
Heptane	Х		X		
Hexane	X		X		
Hydrochloric					Х
Acid					^
Inswool				Х	
Kerosene	Х		Х	Х	
Lead Dust			X	Х	
Lime					X
LP Gas	Х	X			
Lubricants	Х				
Lye				X	X
Magnesium	Х	X	X		
Mastics/ Adhesives	Х		х	Х	
Methanol	Х		Х		
Methyl Ethyl Ketone - MEK				Х	
Mineral				V	
Spirits				X	
Muriatic					X
Acid					^
Nickel			X	X	
Nitrogen	Х	X			

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Paint	X	X	X	
Paint	Y	Y	Y	
Stripper	^	^	^	

#### HAZARD CATEGORIES FOR COMMON PRODUCTS (CONTINUED)

	Flammable/	Compressed	Synthetic	Irritant/	Corrosive
	Combustible	Gas	Poison	Dust	
Pesticides	Х		Х		
Pipe Joint Compound	X		Х	Х	
Portland Cement				Х	
Propane	Х	X			
Sand/ Silica			Х	Х	
Sealants	Х		Х	Х	
Sulfuric Acid					x
Talc			X		
Turpentine	Х		X		
Varnish	Х			X	
Vinyl Chloride			X		
Waterproofing			X	X	
Water					X
Treatments					^
Welding			Х		
Rods					
Wood				Х	
Dust					
Wood Preserves			X		
Zinc			Х		

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#### H. Employee Training Guidelines

- PREPARE OBJECTIVES.
  - A. Develop safety attitude.
  - B. Make employees aware of the hazardous chemicals.
  - C. Motivate employees to protect themselves by preventing exposure to hazardous chemicals.
  - D. Learn how to read and understand labels and SDS.

#### II. DESIGN TRAINING PROCEDURE.

- A. Identify what and where hazardous chemicals are found in the work area.
- B. The nature (odor or visual appearance) and hazard of the chemicals, including local and systemic toxicity.
- C. The specific nature of the operation involving hazardous chemicals that might result in employee exposure.
- D. Specific information to aid the employee in the recognition and evaluation of conditions and situations, which may result in the release of hazardous chemicals.
- E. Purpose for and description of detection or monitoring devices.
- F. The purpose for and application of specific first aid procedures and practices.
- G. The type, use, and limitations of personal protective equipment. This includes location and availability.
- H. Review of the Hazard Communication Standard, 29 CFR 1910.1200.

#### III. TECHNIQUES USED IN THE TRAINING PROCEDURE.

- A. Handout material examples of labels, SDS, etc.
- B. Audiovisual example of labels and SDS.
- C. Demonstration of protective equipment. What it is! How to wear it! Where it is located!
- D. Tests or quiz.
- Attendance records.

#### IV. ASSESSING EFFECTIVENESS.

- A. Were training objectives met?
- B. What part of the training Procedure needs to be revised?
- C. What part of the Procedure was already known and

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consequently unnecessary?

- E. What material was missing?
- F. How often should training be repeated?
- G. What did the employee learn and/or fail to learn?

#### I. Checklist For Hazard Communication Procedure Requirements

The key elements that each employer must implement are a written Procedure, employee training, and record availability and storage.

#### THE WRITTEN HAZARD COMMUNICATION PROCEDURE

- 1. Have you prepared a written list of all the hazardous chemicals present in the workplace?
- Are you prepared to update your hazardous chemical list?
- 3. Do you have up-to-date SAFETY DATA SHEETS (SDS) for those materials on your hazardous chemical lists?
- 4. Are the lists of hazardous chemicals cross-reference/indexed so that identifiers on the list refer to the SDS and warning labels?
- 5. Have you developed a system to ensure that all incoming hazardous chemicals are received with proper labels and SDS?
- 6. Do you have procedures in your workplace to ensure proper labeling or warning signs for bulk storage or secondary usage containers that hold hazardous chemicals?
- 7. Do you have a complete list of the chemical hazards and precautions that you can give to outside contractors?
- 8. Do you have written procedures on how you will inform your employees of the chemical hazards associated with unlabeled pipes?
- 9. Have your employees been informed of the hazards associated with performing non-routine tasks, i.e., confined space, repair and maintenance operations?
- 10. Is your hazard communication Procedure in writing and available to your employees? Is it available in all other non-English speaking employees' language?

#### INFORMATION AND TRAINING

Have you developed an employee information and training Procedure, which includes the following:

- 11. Does the training cover all types of harmful chemicals with which the employee may come into contact under normal usage and unforeseeable emergency?
- 12. Are your workers familiar with the different types of chemicals and the major hazards associated with them (i.e., solvents, corrosives, etc.)?
- 13. Are your employees aware of the specific requirements in the Hazard

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#### Communication Procedure (HCP)?

- 14. Does your Procedure train employees in:
  - (a) operations where hazardous chemicals are present.
  - (b) location; and availability of your written HCP including lists of chemicals and SDS?
- 15. Does your training Procedure include the explanation of labels and warnings that have been established in their work areas?
- 16. Do your employees understand methods to detect presence or release of chemicals in the workplace?
- 17. Does your training Procedure provide information on the appropriate first aid procedures in the event of an emergency?
- 18. Are employees trained in the proper work practices and personal protective equipment in relation to the hazardous chemicals in the work area?
- 19. Does the training include explanation of the labeling system and SDS the employees can obtain and use?
- 20. Have you worked out a system to ensure that new employees are trained?
- 21. Have you developed a system to ensure that new employees are trained?
- 22. Do you have a system to ensure that the current (up to date) SDS are in work areas where the chemicals are used?
- 23. If you become aware of new hazards relating to the chemical in use, do you have a system for informing the employees?

Name:	
Dont.	
Dept.:	
Date:	
<b>-</b>	

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# **Revision History**

Rev	Rev Date	Rev By	Approved By	Description
1.0	1.3.2022	Shayne Torrans	Shayne Torrans	Initial Procedure Document
1.1	12.5.2022	Shayne Torrans	Shayne Torrans	Format Revision

#### Approvals:

Procedure Owner	
Print Name	Date
Signature	_

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# **Competency Assessment**

No.	Questionnaire	C/NYC
Q1		
A1		
Q2		
A2		
Q3		
A3		
Q4		
A4		
Q5		
<b>A</b> 5		

Enclosed Attachments	
Risk Assessment	
Environmental Aspect and Impact	✓
Training and Competency	✓
Measure and Evaluation Tools	

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# **Competency Checklist**

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

Procedure	Competen	су	Date	Competer YES / NC		ployee nature		
	(Please tick appropriate box)							
This employee is o	competent in perform	ning the job.						
This employee has	s not attained the co	mpetency le	evel.		*	<b>!</b>		
	has not attained all con n, provide an extensio			_		s the		
Alternate action to	be taken:							
Signed By	Employee:				Date:			
-	Trainer:				Date:			
,	Assessor:				Date:			
1	Regional Manager:				Date:			

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## **Environmental Aspects and Impacts**

#### Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

Activity	Aspect	Impact			
	Consumption of goods	Conservation of natural resources			
Purchasing & Administrative Work	Consumption of energy (eg. Electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss			
	Generation of waste (eg. Paper)	Consumption of space for waste disposal; Habitat loss			
Climate Control	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss			
	Generation of noise	Disturbance to community; Habitat loss			
Cleaning of – offices / vehicles	Storage, use and release of chemicals	Contamination of air, water or soil; Risk to human health			
	Consumption of energy  Consumption of goods (eg. Oil)	Polease of green house gases and a unospherio be luno;  Consumption of natura resources; Loss of habitat at all stages of generation; Light pollution  Contuint ich unatura resources; Generation of waste; Habitat loss; Biodiversity impacts			
Transport (Fleet vehicles / staff travel)	Generation of waste (eg. Oil)	Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss			
	Exhaust emission	Release of greenhouse gases and atmospheric pollution			
	Use of dangerous goods (eg. Batteries)	Potential contamination of air, water or soil; Risk to human health			
	Generation of noise	Disturbance to community; Habitat degradation			
Operations					

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## Risk Assessment



Risk Assessment // insert_name here										
Step No: Logical sequenc e	Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps.  Each step should be logical and accomplish a major task.	Potential Safety & Environmental Hazards/Impacts at the site of the Job  Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.	Risk Rating  Refer to the risk matrix or HSEQT.PRO. Risk Mgt	Recommended Corrective Action or Procedure  Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be rediced or controlled to ALARP before work commences.  Document who is responsible for implementing the controls to manage each hazard identified.	Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt					
1.										
2.										
3.										
4.										
5.										

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## **Audit**



Process: insert// Procedure: Insert //				Date:  Audited by:  Location of Audit:  Area Mgr/Supervisor:			
Item	Question	ı	Evidence Sited	Comments			Conformance Score 0,3,5
1.							
2.							
3.							
4.							
5.							
6.							
7.							
AUDITOR'S SIGNATURE: SAFETY REP'S SIGNATURE:		CONFORMANCE SCORE:  CONFORMANCE %:	/ 25	3 – Cor	-Conformance tinuous Improvement Opportunity al Conformance	,	

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