Table of Contents

1.0 PURPOSE

Our customers and, in certain cases, the Company itself, are subject to either the Hazard Communication Standard promulgated under the authority of the Occupational Safety and Health (OSHA Act of 1970), the Mine Safety and Health Administration (MSHA 30 CFR Part 47) and to various state right-to-know laws that require product notice and warning relating to the use and distribution of construction material aggregates and products. Vulcan Materials

Company's Mission Statement provides in part, "Our mission is to be responsible stewards with respect to the safety and environmental impact of our operations and products . . . ." The intent of this SPI is to aid in meeting those statutory requirements and in fulfilling the Company's commitments under its Mission Statement.

2.0 RESPONSIBILITIES

1. It shall be the responsibility of each Division President to designate and assign responsibilities for the implementation of this SPI. The Division President, or his/her designee, shall distribute a copy of this SPI to staff personnel who have responsibilities under this SPI and to the manager of each production and sales yard facility, who, in turn, shall be responsible for compliance.

2. The Corporate Safety, Health, and Environmental Office shall be responsible for providing advice relating to this SPI, developing, reviewing, approving, updating, and archiving the Safety Data Sheet ("SDS") for each Vulcan Materials Company product, and developing all hazard warning language for product labels, individual container labels, weigh ticket warnings, tags, signs, documents and notices necessary to comply with this SPI.

3. The Corporate Legal Department and Corporate Risk Management Department shall be responsible for approving SDS and hazard warning language and for providing legal advice relative to compliance with this SPI and requirements under relevant laws.

4. The Division Technical Services Department shall be responsible for providing technical advice relative to the physical and chemical properties of the products.

5. The Corporate Accounts Receivable Office shall be responsible for providing New Credit Customers with the proper notification on how to obtain an SDS online or via the telephone number and/or providing New Credit Customers with hard copies of the SDSs.

3.0 SAFETY DATA SHEET DEVELOPMENT AND APPROVAL

1. No product shall be distributed without an approved SDS.

2. For any new product or change to an existing product that is proposed by a Division, the Division shall forward to the Corporate Safety and Health Office:

   a. A completed “Request for SDS Modification and/or Development” form (see Attachment A).

   b. SDSs obtained from the supplier for each product component or ingredient for the proposed new product or product being changed.

3. An SDS shall be promptly developed, reviewed and approved by the personnel listed on the SDS Review and Approval Form (Attachment B), for each new or changed product in order to allow adequate time to distribute the SDS in accordance with statutory time requirements and this SPI. Depending on product complexity SDS development may require up to 90 days to be completed and reviewed.

4. The SDS shall be in compliance with the OSHA and MSHA Hazard Communication Standards, ANSI Z400.1 and applicable state laws. The Effective Date of the SDS shall be clearly noted on the SDS.

5. All SDS shall be periodically reviewed every five (5) years by the Corporate Safety and Health Office. This periodic review shall include a toxicological review.

6. If the Company becomes aware of any newly discovered information regarding the hazards of a product or ways to protect against the hazards in between the five (5) year review, the Corporate Safety and Health Office shall, within three (3) months of the discovery of the new information, undertake a process to review the SDS and to determine if the new information should be added to the SDS.

7. The revised SDS will be marked with an Effective Date.

4.0 SAFETY DATA SHEET ARCHIVES

1. A Product Data File shall be maintained by the Corporate Safety and Health Office for each product (see Attachment C, Product Data File Contents).

2. A Product Data File shall be retained for thirty (30) years after the date on which the product is discontinued.

5.0 DISTRIBUTION OF SAFETY DATA SHEETS

The distribution of SDS will be overseen by the Corporate Safety and Health Office.

5.1 NEW CUSTOMERS

The Corporate Accounts Receivable Office shall distribute all applicable SDS to new customers either through notification of SDSs availability on Vulcan's website or by providing hard copies. Applicable SDS shall be distributed by the designated person to the new customer along with customer's credit approval letter. Applicable SDS means all SDS for all products that a new customer could purchase. The designated person responsible for the distribution shall document the distribution of the SDS. The distribution documentation shall be maintained for three (3) years.

5.2 Revised SDS

If an SDS is revised due to newly discovered information, the Corporate Safety and Health Office will distribute the revised SDS to all known customers. Documentation of the distribution of the revised SDS will be recorded and maintained.

5.3 New SDS

The Corporate Safety and Health Office shall give written notification to the applicable Division(s) that may sell the new or modified product when the SDS has been finalized and uploaded to the Vulcan Materials Company website.

Each Division which sells the new or modified product shall be responsible for obtaining adequate numbers of the new SDS from the Vulcan Materials Company website for distribution to the customer(s) which purchase the new or modified product.

5.4 SDS Requests

Each production plant and sales yard facility shall post a notice in a location that is visible to customers which states “Vulcan Materials Company Safety Data Sheets (SDS) Available upon Request.”

Any time a third party (e.g. customer) requests a specific SDS such a request is to be handled by accessing the Vulcan Materials Company website (http://www.vulcanmaterials.com) for the current SDS or contacting 3E Company at 1-800-451-8346 and requesting that the SDS be faxed to that particular location for distribution to the third party or to the third party’s fax machine.

5.5 Internet Link

An SDS internet link will be provided and maintained by the Corporate Safety and Health Office or its designee. A product SDS can be obtained by accessing the Vulcan Materials Company homepage at the following internet site, http://www.vulcanmaterials.com. This internet link is accessible to third parties and customers who may obtain copies of product SDS through this internet site.

5.6 State and Local Regulatory Agencies

Various state and local regulatory agencies require the distribution of product SDS to their respective agencies under community right-to-know laws. It is incumbent upon each Division to be knowledgeable of such requirements and to maintain records of such distributions.

5.7 Bulk Transport Vehicles

All Vulcan owned or leased bulk transport vehicles transporting products such as asphalt mixes, fly ash, emulsions, cement, ready-mix or slag on public roadways must have the current SDS available in the operator cab for the product being transported.

6.0 Product Warning Labels, Individual Container Labels, Weigh Ticket Warnings, Tags, Signs and Notices

1. The Corporate Safety and Health Office shall be responsible for developing, periodically reviewing, updating, approving, distributing and archiving the hazard warning language for product labels, individual container labels, weigh ticket warnings, tags, signs and notices.

2. For any new product or change to an existing product for which a "Request for SDS Modification and/or Development" form has been forwarded to the Corporate Safety and Health Office, the hazard warning language for a product label, individual container label, weigh ticket warning, tag, sign or notice shall be promptly developed, reviewed and approved by the Corporate Safety and Health Office, Corporate Environmental Office, Division Technical Services Center, Corporate Risk Management Department , and Corporate Legal Department in order to allow adequate time to deliver the modified document to the appropriate parties for distribution in accordance with the SPI.

3. The hazard warning language shall be in compliance with the OSHA and MSHA Hazard Communication Standards, ANSI Z129.1 and applicable state laws.

4. The hazard warning language for a product shall be reviewed by the Corporate Safety and Health Office every five (5) years which will coincide with the product's SDS review.

5. If the Company becomes aware of any newly discovered information regarding the hazards of a product or ways to protect against the hazards in between the five (5) year review, the Corporate Safety and Health Office shall, within three (3) months of the discovery of the new information, undertake a process to review the SDS and to determine if the new information should be added to the hazard warning language.

6. If the hazard warning language requires revision as a result of the five (5) year periodic review, or because the Company becomes aware of newly discovered information concerning the hazards of the product or ways to protect against the hazards, the revised hazard warning language will be marked with a new Effective Date, distributed, and posted.

7. A copy of the product's hazard warning language shall be maintained in the Product Data File identified in Section D above.

8. Each Division shall be responsible for the distribution and posting of hazard warning notices.

9. Silica hazard warning signs will be appropriately placed in the scales location at every plant and sales yard and maintained by each Division.

    a. The Silica Hazard Warning Sign should be sized and located so that it will be readily observable and readable for vehicle traffic.

    b. The Silica Hazard warning Sign will be in both English and Spanish.

10. The Silica Hazard warning Sign should be placed at any Bag House Entryway.

11. The Silica Hazard Warning sign will be placed at the sign-in sheet in the plant office. The sign should be located so that it will stand out and be readily observable and readable from the sign-in sheet.

12. Site Specific Training will include the Silica Hazard Warning Sign. The statement "I have read and understand the Vulcan Silica Hazard Warning Sign".

7.0 POLICY FOR HAZARD WARNINGS FOR RAIL AND BARGE SHIPMENTS

1. For each shipment of material via rail or barge, an appropriate hazard warning must be used. Form VMC- 2120 is used for crushed stone or sand and gravel. Form VMC-2121 is used for asphalt. The appropriate hazard warning must be sent to:

    a. The carrier of the shipment from Vulcan's location, and any known additional carriers; and

    b. The customer to whom Vulcan sold the material. No warning is required to be sent to the destination for transfers to other Vulcan facilities.

2. The warning may be sent in one of the following manners:

    a. Fax using a fax machine with "sent" confirmation capability.

b. Email that includes a confirmed mail receipt.

c. Physical delivery of warning documented in a log maintained at a Vulcan facility.

3. The confirmations of receipt and logs must be maintained for a period of three (3) years.

8.0 CONTROL PROCEDURES FOR CHANGES TO SHIPPING DOCUMENTS

Purpose: The Company has standardized the text, design, and placement of standard product warnings printed on each type of shipping document. This standard includes the hazard warning language, precautionary statements, pictograms, and hazard classifications that appear on the document. Procedures must be in place to prevent unauthorized and unintended changes to standard product warnings.

1. The Corporate Safety, Health, and Environmental Office, in conjunction with the Corporate Legal Department and Corporate Risk Management Department, will:

   a. Select and maintain the text, design, and placement for product warning standards;

   b. Communicate the standards for product warnings to the Vulcan organization; and

   c. Approve and authorize any proposed changes to the standard product warnings.

2. The Vice President of Treasury or his/her designee will:

   a. Approve all purchase requests for shipping documents;

   b. Be familiar with and understand the standard product warnings;

   c. Ensure that requested changes do not affect the standard product warnings; and

   d. Obtain approval and authorization from the Corporate Safety Health and Environmental Office, Corporate Legal Department and Corporate Risk Management Department for any proposed changes to the product warning standard.

9.0 AUDITS

1. The Product Data files, and the documentation of SDS distribution, shall be audited for compliance and proper recordkeeping by the Corporate Legal Department or its designee periodically. A completed audit checklist (Attachment D) shall be given to the Corporate Safety and Health Office, which will designate a person responsible to rectify non-compliances, if any. The designated person shall document that the non-compliances have

been corrected. The audit checklist and any documentation of corrected non-compliances shall be maintained by the Corporate Safety and Health Office for three (3) years.

2. Division audits shall be conducted by personnel designated by the Division President. Audits at all facilities shall be conducted every three (3) years. An audit checklist (Attachment E) shall be completed for each audit.

3. A report of audit Division each shall be submitted to the Division President, Corporate Safety and Health Office, and the Corporate Legal Department.

4. The Division shall be responsible for promptly rectifying any noncompliance noted in an audit report and documenting all corrections. Documentation of all corrections shall be forwarded to the Corporate Safety and Health Office and Corporate Legal Department. Copies of the completed Division audit checklists and documentation of any deficiency corrections shall be maintained by the Division and Corporate Safety and Health Office for three (3) years.

ATTACHMENT A – SAFETY DATA SHEET REQUEST FOR MODIFICATION AND/OR DEVELOPMENT

Vulcan Materials Company Division:	
Product SDS Review/Update? Y N	**Product SDS Development? Y N**
Trade Name (Product Name, Marketing Name):	**Change? Y N**
Synonyms:	**Change? Y N**
Product Components (Ingredients):	**Change? Y N**
Product Components Approximated by Percentage:	
SDS For Each Component Must Be Attached	
Appearance, Color, Odor, Constituency, ETC:	**Change? Y N**
Specific Gravity:	**Change? Y N**
pH:	**Change? Y N**
Will This Product Be Shipped By Rail Or Barge?	**Change? Y N**

Additional Comments/Information:

For Corporate Safety, Health, and Environmental Office:

Is There a Need For a New Hazard Warning Label, Weigh Ticket or Barge and Rail Warning?	**Y N**
Requested By:	
Date Received By Safety Health and Environmental Office:	

Attachment B – Safety Data Sheet Review Form

SDS to be Updated or Developed:
Requestor:
Section(s) to be Updated:
Reason(s) for modification:

Reviewed By:

Title	Signature	Date
Corporate Safety and Health Office (Entire SDS and applicable hazard warning language)		
Corporate Environmental Office (Sections 2,6,7,12,13,14, and 15)		
Division Technical Services (Section 9)		
Corporate Risk Management Department (Entire SDS and applicable hazard warning language)		
Corporate Legal Department (Entire SDS and applicable hazard warning language)		

ATTACHMENT C – PRODUCT DATA FILE CONTENTS

SECTION	TITLE	DESCRIPTION
I.	Product Line	Identify product name, product type, C.A.S. Number, Vulcan SDS printing code product information sheet code and Effective Date of SDS.
II.	Product Information Sheet	List the components and percentages of the product, the product component's manufacturer's name, the substances in each component, the C.A.S. numbers of the product components, and the component manufacturer's SDS reference codes.
III.	Manufacturer's SDS	Contains the product component's manufacturer's SDS.
IV.	Toxicological Review	Contains Toxicological Review and periodic updates.
V.	Test Results	Contains test reports of physical or chemical testing performed on the product, if any.
VI.	Hazard Warning Language	Contains the product's hazard warning language (e.g. bag or drum labels, weight tickets, tag, signs).
VII.	Request/Review Forms	Contains the completed SDS review form and completed Material Safety Data Sheet Request for Modification and/or Development form, if one exists.
VIII.	Archived SDS/Warnings	Contains all outdated SDS and/or hazard warning language for the product and the information described in Sections I – VII above that is associated with such prior version of SDS and/or hazard warning.

ATTACHMENT D – AUDIT CHECKLIST FOR PRODUCT HAZARD WARNING SPI (CORPORATE SAFETY AND HEALTH OFFICE)

Date:		Page 1 of 3
Section A - Responsibilities		Name
1.	Identify who in the Corporate Safety and Health Office is responsible for implementing this SPI.	

Section B – SDS Development, Approval and Archiving		**YES**	**NO**	**N/A**	**Comments on Back**
1.	Does each VMC product have a current SDS?				
2.	Are all current SDS marked with an Effective Date?				
3.	Are there foreign language versions available for each SDS?				
4.	Is each SDS in compliance with:				
	(a) OSHA Hazard Communication Standard? (is current standard on file?)				
	(b) MSHA Hazard Communication Standard? (is current standard on file?)				
	(c) GHS				
5.	Does a Product Data File exist for each product?				
6.	Does the Product Data File (Attachment C) for each product identify or contain the following:				
	(a) Product Line information				
	(b) Completed Product Information Sheet				
	(c) The Safety Data Sheet (SDS) for each ingredient or component added to the product?				
	(d) Toxicological Review Report				
	(e) Independent Test Results?				
	(f) Copies of labels, tags or other warning notices for the product?				
	(g) SDS Request Form?				
	(h) SDS Review and Approval Form?				
	(i) Prior outdated SDS and Hazard Warnings Archived?				
7.	Have all product SDSs been reviewed, including a toxicological review, within the last five (5) years?				

8.	Did VMC become aware of any new information regarding the hazards of any product or ways to protect against the hazards within the last three (3) years? If yes,				
	(a) Did the Corporate Safety and Health Office review the SDS and hazard warning language within 3 months of becoming aware of newly discovered information?				
	(b) Did new information need to be added to the SDS and/or hazard warning due to the new information and was it added within 3 months?				
9.	Did the Corporate Safety and Health Office develop an SDS for any new product during the last three (3) years? If yes,				
	(a) Does the SDS Review and Approval form (Attachment B) contain all of the necessary approvals for the hazard warning?				
Section C – Product Hazard Warning Dissemination		**YES**	**NO**	**N/A**	**Comments on Back**
1.	Are the most current versions of Vulcan Materials product SDSs available on the company's website?				
2.	Has the Accounts Receivable Office distributed Vulcan Materials product SDSs to all new credit customers?				
	(a) Are directions and a web address provided on the credit approval letter?				
	(b) Were hard copies of Vulcan Materials product SDSs provided to requestors?				
	(c) Is distribution documented?				
Section D – Product Warning Labels, Individual Container Labels, Tags and Notices		**YES**	**NO**	**N/A**	**Comments on Back**
1.	Did the Corporate Safety and Health Office develop a new hazard warning due to newly discovered information during the past three (3) years? If yes,				
	(a) Did the Corporate Safety and Health Office provide written notification to relevant Divisions regarding the new hazard warning?				
2.	Are all product warning standards maintained by the Corporate Safety and Health Office?				
3.	During the past three (3) years, did the Corporate Safety and Health Office select the text, design and placement of product warning standards and/or approve and authorize any proposed changes to the standard product warning? If yes,				
	(a) Did the Corporate Legal Department and Corporate Risk Management Department approve and authorize the selection				

	and/or changes?				
	(b) Did the Corporate Safety and Health Office communicate the product warning standards to the organization?				

	Section E – Division Audits	YES	NO	N/A	Comments on Back
1.	Has the Corporate Safety and Health Office received an audit report from each Division within the last three (3) years?				
2.	Were copies of each Division audit report provided to:				
	(a) The Division President?				
	(b) Corporate Legal Department?				
3.	Have all Division audit reports from the last three (3) years been maintained by the Corporate Safety and Health Office?				
4.	Does the Corporate Safety and Health Office maintain the documentation of all audit non-compliance corrections made by the Divisions during the past three (3) years?				
	Section F – System Auditing	**YES**	**NO**	**N/A**	**Comments on Back**
1.	Identify the person(s) responsible for performing this Corporate audit of the Product Hazard Warning System:				
2.	What was the date of the Corporate Safety and Health Office audit prior to this audit?				
3.	Was a report of the previous audit submitted to the Corporate Safety and Health Office?				
4.	Is the prior audit report maintained by the Corporate Safety and Health Office?				
5.	Who was responsible for rectifying any non-compliance noted in the prior audit report?				
6.	Were all non-compliances noted in the prior audit report rectified in a timely manner?				
7.	Does documentation exist for the non-compliance corrections from the prior audit report?				

ATTACHMENT E – AUDIT CHECKLIST FOR PRODUCT HAZARD WARNING SPI (DIVISION)

Date:					Page 1 of 2
Section A – Responsibilities		**YES**	**NO**	**N/A**	**Comments on Back**
1.	Has the Division President designated in writing each person who is responsible for implementing this SPI?				
Section B – SDS Development and Approval		**YES**	**NO**	**N/A**	**Comments on Back**
1.	Identify the person(s) in the Division who is (are) responsible for new product development:				
2.	Did the Division develop a new product or change an existing product during the past three (3) years? If yes, for each product:				
	(a) Did the Division complete and forward to the Corporate Safety and Health Office a “Request for SDS Modification and/or Development Form” (Attachment A)?				
	(b) Did the Division obtain and forward to the Corporate Safety and Health Office the SDS from the supplier for each product component or ingredient?				
Section C – SDS Distribution		**YES**	**NO**	**N/A**	**Comments on Back**
1.	Does each production and sales yard facility have a notice posted in a location where it can be easily seen and read by all customers stating: "Vulcan Materials Company Material Safety Data Sheets (SDSs) Available Upon Request"?				
2.	Does the Division use the VMC website to respond to telephone or written requests for SDS?				
3.	Have state and local requirements for submitting product SDS been satisfied?				
4.	Do all Vulcan owned or leased bulk transport vehicles transporting asphaltic materials, cement, fly ash, slag or ready-mix concrete have a current SDS available in the operator's cab?				

	Section D – Product Warning Labels, Individual Container Labels, Tags, and Notices	**YES**	**NO**	**N/A**	**Comments on Back**
1.	Is the approved warning language for silica printed on all relevant weigh tickets used in the Division?				
2.	Do all ready mix concrete weigh tickets include an approved warning for handling wet concrete?				
3.	Do all asphalt product weigh tickets include an approved warning for handling asphaltic materials?				
4.	Have the labels for all bagged or drummed products been approved by the Corporate Safety and Health Office?				
5.	Are silica hazard warning signs appropriately placed at each production plant and sales yard (VMC-1901)?				
6.	Are appropriate hazard warnings provided to the carrier(s) and customer(s) for any shipment of materials via rail and barge?				
7.	Are all confirmation receipts and logs of rail and barge shipments maintained for the last three (3) years?				
	Section E – System Auditing	**YES**	**NO**	**N/A**	**Comments on Back**
1.	Identify the person(s) responsible for performing this Division audit of the Product Hazard Warning System:				
2.	What was the date of the Division audit prior to this audit?				
3.	Was a report of the previous audit submitted to the:				
	(a) Division President?				
	(b) Corporate Safety and Health Office?				
	(c) Corporate Legal Department?				
4.	Is the prior audit report maintained by the Division?				
5.	Who was responsible for rectifying any noncompliance noted in the prior audit report?				
6.	Were all non-compliances noted in the prior audit report rectified in a timely manner?				
7.	Does documentation exist for the non-compliance corrections?				