

CONDEA VISTA COMPANY
Aberdeen Plant
Safety & Health Manual

Subject: **Hazard Communication Program**

Code: VSP 10

Revision: 3

Effective: March 21, 1997

Approved By:



Safety & Health Manager

Approved By:



Plant Manager

I. PURPOSE AND SCOPE

The purpose of this program is to ensure that employees are adequately informed of the hazards and necessary protective measures associated with chemicals used in the Aberdeen Chemical Plant.

The program applies to all materials known to be stored or used in a way that could cause harmful exposures under either normal or emergency conditions. For purposes of this program, a hazardous material is as defined by the OSHA Hazard Communication regulation, CFR 190.1200. Copies of this program and any relevant MSDS are available, upon request, to employees.

II. PROGRAM ELEMENTS

The Aberdeen Chemical Plant's Hazard Communication Program will consist of the following elements:

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II. PROGRAM ELEMENTS - Continued

A. Chemical Inventory Control Program

An approval procedure, including a continued review of chemicals and an assessment of their hazards, for chemicals brought into the plant.

B. MSDS Files

A system of maintaining material safety data sheets (MSDSs) which are readily available to all employees.

C. Labeling Requirements

Procedures to ensure that each container of hazardous material is adequately labeled.

D. Contractor Notification

A means by which contractors who work in the plant are adequately informed of the hazardous chemicals they may encounter during their work.

E. Employee Training

A program for training employees on the hazards associated with chemicals with which they work.

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III. CHEMICAL INVENTORY CONTROL PROGRAM**A. Hazard Assessment and Approval**

A hazard assessment and approval process must be completed for each new chemical before it is purchased or received by CONDEA Vista or brought into the plant by contractors.

1. Anyone who wants a new chemical brought into the plant must initiate the process by:
 - a. Obtaining an MSDS for the chemical.
 - b. Completing the "Request for Use" section of a "Chemical Approval/Hazard Assessment" form (see attached form).
 - c. Forwarding the form and MSDS to the Safety Supervisor.
2. Upon receipt of the approval form and MSDS from the requester, the Safety Supervisor will:
 - a. Assess the hazards of the chemical, using the MSDS along with any other appropriate reference materials.
 - b. Record the assessment results by completing the "Safety Review" portion of the approval form.

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III. CHEMICAL INVENTORY CONTROL PROGRAM - Continued

A. Hazard Assessment and Approval - Continued

- c. Approve or disapprove the material for plant use.
 - d. If the material is approved, he will forward the MSDS and the approval form to the Senior Environmental Coordinator.
 - e. If the material is not approved, he will return the MSDS and the approval form to the requester, having recorded the reason for the disapproval in the "Comments" section of the form.
3. After receiving the approval form and the MSDS from the Safety Supervisor, the Senior Environmental Coordinator will:
- a. Conduct an environmental review of the material in question, using the MSDS and any other appropriate references.
 - b. Record his findings in the "Environmental Review" portion of the approval/assessment form.

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III. CHEMICAL INVENTORY CONTROL PROGRAM - Continued

A. Hazard Assessment and Approval - Continued

- c. Approve or disapprove the material for plant use. If the material is disapproved, he will note the reason in the "Comments" portion of the form.
 - d. Return the MSDS and the approval form to the Safety Supervisor.
- 4. After receiving the MSDS and the approval form from the Senior Environmental Coordinator, the Safety Supervisor will:
 - a. Review the results of the approval form for completeness.
 - b. If the chemical has been approved for use by the Senior Environmental Coordinator, so advise the requester and send him a copy of the approval.
 - c. If the chemical has not been approved for use, return the approval form and MSDS to the requester.
- 5. Once the requester has received an approved request form, the chemical may be purchased using normal procedures.

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Aberdeen Plant**Safety & Health Manual**
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The plant will maintain manufacturer-supplied MSDSs for all chemicals used in the plant. The MSDSs will be maintained and accessible to all employees and contractors via the CONDEA Vista "Document Management System (DMS)".

B. New Chemicals

When a new chemical has been approved for use, its MSDS must be put into DMS by either the Safety Supervisor or a person acting on his behalf. In the case of the later, the Safety Supervisor will provide a properly-coded "load sheet" and the MSDS to the person doing the work.

The Safety Supervisor will also provide a copy of the relevant "Chemical Approval/Hazard Assessment" form to the plant department managers when training of their personnel on the new chemical is required.

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Aberdeen Plant**Safety & Health Manual**
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When new issues of MSDSs for existing chemicals arrive, the Safety Supervisor will review the new sheet(s) to determine if any significant change in hazards is evident. If such is found, he will issue a memo to the Department Managers requiring training on the chemical.

V. HAZARDOUS MATERIAL LABELING**1. Hazardous Materials from Suppliers**

Purchasing will require the plant's material suppliers to provide labeling on their containers which conforms to the requirements of the OSHA Hazard Communications regulation.

The Receiving Lead will inspect all incoming shipments of chemicals to ensure that each container is intact and clearly marked with the identity (chemical, common name, or other identity which appears to on the manufacturer's MSDS for the material) and a hazard warning which indicates the principal hazard(s) present, if any. Any deficiency found will be immediately reported and no use made of the material until corrections have been made.

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Aberdeen Plant**Safety & Health Manual**
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Once received, hazardous materials will be kept in the manufacturer-supplied containers whenever feasible until actually used. Each plant department will ensure that all such containers stored or used in its plant area(s) are used only as designated, that they retain design integrity, that they are kept closed except during actual use, and that the manufacturer-supplied labels are not removed, defaced, or obscured in any manner. The department will correct any such deficiencies whenever they are found. When relabeling is needed, any method of marking is acceptable, provided it is legible and includes the same identity (name, code, etc.) and hazard warning that appears on the manufacturer-supplied container.

2. Temporary Storage Containers of Hazardous Materials

All temporary storage containers of hazardous materials must be marked with the same identities (chemical name, common name, or ID code, etc.) and hazard warning that appear on the manufacturer-supplied containers. This includes containers used for immediate transfers, similar activities. Process vessels are marked as noted below.

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V. HAZARDOUS MATERIAL LABELING - Continued**3. Process Vessels and Piping**

The vinyl reactor areas, the VCM tank farm, and the compound area will be provided with perimeter hazardous material warning signs. The signs will comply with the regulatory requirements peculiar to each area and will instruct all people entering them to refer to DMS for the detailed hazard information and handling safety associated with chemicals in the areas, including those in unmarked pipes.

4. Vessels

All plant vessels which contain hazardous chemical(s) will be marked to indicate the nature of the chemical hazards they contain, using the following codes:

CGS - Compressed Gas
COM - Combustible Liquid
COR - Corrosive
CSA - Cancer Suspect Agent
FLM - Flammable
ING - Ingestion Hazard
INH - Inhalation Hazard

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IRR - Irritant
OXI - Oxidizer
PER - Organic Peroxide
SEN - Sensitizer
SKN - Skin Contact Hazard
TOX - Toxic

5. Manufacturer's Labels

Labels applied by Manufacturers on their containers of hazardous chemicals must not be removed, defaced, or obscured in any manner.

VI. CHEMICAL HAZARDS OF NON-ROUTINE TASKS

The chemical hazards associated with all non-routine tasks (e.g., cleanout of vessels) will be controlled by existing safe work practices, including the strict use of the plant's Safety Control Permit procedure. Each such job will be evaluated for the presence (existing or potential) of chemical hazards. All personnel, including contractors, involved in the work will be advised of the hazards and the control measures required to preclude chemical exposure. No job may proceed until this has been done.

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Contractors must comply with all company rules and regulations pertaining to the control of chemical hazards, including those associated with non-routine tasks.

Contractors may not bring chemicals onto plant property until approved, as described in III above.

VIII. EMPLOYEE TRAINING

Everyone who works in the plant must receive appropriate training on the hazardous materials with which they work. Such training will include:

- A. How to use the plant's chemical labeling system.
- B. The operation in work areas where hazardous materials are present.
- C. The methods used to detect the presence or release of a hazardous material in the work areas.
- D. The physical and health hazards of materials in the work area.
- E. The protective measures to be taken to prevent chemical injury or illness.

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VIII. EMPLOYEE TRAINING - Continued

- F. The location and availability of this written program (in DMS).
- G. An explanation of how to use MSDSs, when needed.
- H. How to obtain and use appropriate hazard information.

The Safety Department will conduct the initial training for all new employees, visitors, and contractors, depending on need.

Plant departments will conduct training when a new hazard (e.g., new chemical, process change, procedure change, etc.) is introduced into the workplace. Training is not necessary for each new chemical, provided no new hazard is present.

All such training will be documented, using the "Safety Training Attendance Record" form, copies of which are to be forwarded to be kept by Employee Relations.

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ABERDEEN CHEMICAL PLANT
CHEMICAL APPROVAL/HAZARD ASSESSMENT
REQUEST FOR USE

Product Name:	Manufacturer:
What will the material be used for?	
Which department(s) will use the chemical?	
Requested By:	Date:
NOTE: PLEASE ATTACH THE MSDS TO THIS FORM AND FORWARD BOTH TO THE SAFETY SUPERVISOR.	

SAFETY REVIEW

Physical Hazards (check all appropriate)		
Combustible liquid	Flammable gas	Organic peroxide
Compressed gas	Flammable Liquid	Oxidizer
Explosive	Flammable Solid	Pyrophoric
Unstable	Water-reactive	
Health Hazards (check all appropriate)		
Carcinogen	Irritant	Sensitizer
Toxic		
Biomodes of Entry (check all appropriate)		
Eye	Skin	Inhalation
Ingestion		
Is training required for this chemical? (circle one) Yes No		
Comments:		
Approved for use:		Date:
Not approved for use:		Date:

ENVIRONMENTAL REVIEW

Would this chemical impact plant emissions? (circle one) Yes No		
Would this chemical produce hazardous waste? (circle one) Yes No		
If hazardous, it is do due to: (check all appropriate)		
Ignitability	Corrosivity	Reactivity
Toxicity	A listed waste	
Reportable under SARA 313 under any quantity: (circle one) Yes No		

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CHEMICAL APPROVAL/HAZARD ASSESSMENT
(Continued)**ENVIRONMENTAL REVIEW - Continued**

Is the chemical listed under CERCLA?	(circle one) Yes	No
Listed as a Hazardous substance (40 CFR 302.4)		
Listed as an Extremely Hazardous substance (40 CFR 355-20)		
Comments:		
Approved for use:	Date:	
Not approved for use:	Date:	

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