CONDEA VISTA COMPANY
Aberdeen Plant
Safety & Health Manual

Subject: **Hazard Communication Program**

Code: VSP 10 Revision: 5 Effective: November 1, 1999

Approved By: **CMM Signature on File** Safety & Health Manager

Approved By: **PJK Signature on File** 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 1910.1200. 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:

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 are adequately labeled.

II. PROGRAM ELEMENTS - Continued

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.

F. Program Review

The plant's Hazard Communication Program will be reviewed annually by the Industrial Hygiene/Safety Coordinator to gauge compliance to CFR 1910.1200.

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 Industrial Hygiene/ Safety Coordinator.

III. CHEMICAL INVENTORY CONTROL PROGRAM - Continued

2. Upon receipt of the approval form and MSDS from the requester, the Industrial Hygiene/Safety Coordinator 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.

   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 Environmental Manager and Materials/Logistics & Laboratory Manager.

   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 Industrial Hygiene/Safety Coordinator, the Environmental Manager, and Materials/Logistics & Laboratory Manager 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.

   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 Industrial Hygiene/Safety Coordinator.

III. CHEMICAL INVENTORY CONTROL PROGRAM - Continued

4. After receiving the MSDS and the approval form from the Environmental Manager and the Materials/Logistics & Laboratory Manager, the Industrial Hygiene/Safety Coordinator will:

   a. Review the results of the approval form for completeness.

   b. If the chemical has been approved for use by the Environmental Manager and the Materials/Logistics & Laboratory Manager, 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.

6. If a request is rejected, either the Industrial Hygiene/Safety Coordinator or Environmental Manager, then the chemical will not be brought into the plant.

IV. MATERIAL SAFETY DATA SHEETS (MSDS)

A. Hazardous Material Reference Books

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)". Also, the original copies of the MSDSs can be found in the plant's first aid room.

IV. MATERIAL SAFETY DATA SHEETS (MSDS) - Continued

B. New Chemicals

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

The Industrial Hygiene/Safety Coordinator 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.

C. Existing Chemicals

When new issues of MSDSs for existing chemicals arrive, the Industrial Hygiene/Safety Coordinator will review the new sheet(s) to determine if any significant change in hazards is evident. If such is found, the new MDSDs will be added to DMS in order to provide updated chemical information. If necessary, a memo will be issued 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. According to OSHA Hazard Communication regulation, labels are required to contain the identity of the hazardous chemicals, appropriate hazard warnings, and name and address of the chemical manufacturer.

V. HAZARDOUS MATERIAL LABELING - Continued

1. Hazardous Materials from Suppliers – continued

   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.

   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 appears on the manufacturer-supplied containers. This includes containers used for immediate transfers, similar activities. Process vessels are marked as noted below.

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 sings. 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
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.

VII. CONTRACTORS

Contractors will have MSDS access through their company contact, DMS, and/ or original. MSDSs are stored in the first aid room.

Contractors will be informed of necessary protective measures that may be needed while working in the plant. Hazards are conveyed during the planning and determining of the scope of a project. Work permits issued will review and re-emphasize hazards and protective measures necessary (reference Safe Work Permit Procedure).

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.

VIII. EMPLOYEE TRAINING - Continued

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.

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 will be kept by Human Resources.

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 INDUSTRIAL HYGIENE/SAFETY COORDINATOR.	

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:	

ABERDEEN CHEMICAL PLANT
CHEMICAL APPROVAL/HAZARD ASSESSMENT
(Continued)

ENVIRONMENTAL MANAGER 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	
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: