

Interoffice
Communication

TO: Dave Penney-Austin

TO: ~~101~~ ~~102~~ ~~103~~ ~~104~~ ~~105~~ ~~106~~ ~~107~~ ~~108~~ ~~109~~ ~~110~~ ~~111~~ ~~112~~ ~~113~~ ~~114~~ ~~115~~ ~~116~~ ~~117~~ ~~118~~ ~~119~~ ~~120~~ ~~121~~ ~~122~~ ~~123~~ ~~124~~ ~~125~~ ~~126~~ ~~127~~ ~~128~~ ~~129~~ ~~130~~ ~~131~~ ~~132~~ ~~133~~ ~~134~~ ~~135~~ ~~136~~ ~~137~~ ~~138~~ ~~139~~ ~~140~~ ~~141~~ ~~142~~ ~~143~~ ~~144~~ ~~145~~ ~~146~~ ~~147~~ ~~148~~ ~~149~~ ~~150~~ ~~151~~ ~~152~~ ~~153~~ ~~154~~ ~~155~~ ~~156~~ ~~157~~ ~~158~~ ~~159~~ ~~160~~ ~~161~~ ~~162~~ ~~163~~ ~~164~~ ~~165~~ ~~166~~ ~~167~~ ~~168~~ ~~169~~ ~~170~~ ~~171~~ ~~172~~ ~~173~~ ~~174~~ ~~175~~ ~~176~~ ~~177~~ ~~178~~ ~~179~~ ~~180~~ ~~181~~ ~~182~~ ~~183~~ ~~184~~ ~~185~~ ~~186~~ ~~187~~ ~~188~~ ~~189~~ ~~190~~ ~~191~~ ~~192~~ ~~193~~ ~~194~~ ~~195~~ ~~196~~ ~~197~~ ~~198~~ ~~199~~ ~~200~~ ~~201~~ ~~202~~ ~~203~~ ~~204~~ ~~205~~ ~~206~~ ~~207~~ ~~208~~ ~~209~~ ~~210~~ ~~211~~ ~~212~~ ~~213~~ ~~214~~ ~~215~~ ~~216~~ ~~217~~ ~~218~~ ~~219~~ ~~220~~ ~~221~~ ~~222~~ ~~223~~ ~~224~~ 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Product Stewardship Code of Management Practices

PURPOSE AND SCOPE

The goal of product stewardship is to prevent harm to human health and the environment from our products when they are manufactured, distributed, used and disposed of properly.

The purpose of the Product Stewardship Code of Management Practices is to provide guidance on what is needed to achieve this goal, and to provide a means to measure continuous improvement throughout all stages of the product's life.

The scope of the code covers research and development, manufacture, distribution, use and disposal of products.

The code recognizes that all parties to the development, manufacture, sale, distribution, use and disposal of a chemical product have responsibilities which should be fulfilled in order to achieve the desired goal. Each party in the chain of production and use of chemicals needs to fulfill its responsibilities in order to achieve industry's and society's desire for safe and environmentally compatible products. This code is meant to assist in identifying certain areas where the manufacturer and seller of a product may be of assistance. It does not limit the responsibilities of employers for providing a safe and healthful workplace for employees, or the responsibility of other users for following safe and environmentally sound practices.

RELATIONSHIP TO RESPONSIBLE CARE AND GUIDING PRINCIPLES

Implementation of the code promotes achievement of several of the Responsible Care Guiding Principles:

- o to make health, safety and environmental considerations a priority in our planning for all existing and new products and processes;
- o to develop and produce chemicals that can be manufactured, transported, used and disposed of safely;
- o to extend knowledge by conducting or supporting research on the health, safety and environmental effects of our products, processes and waste materials;
- o to counsel customers on the safe use, transportation and disposal of chemical products;

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- o to report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures;
- o to promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

MANAGEMENT PRACTICES

Companies shall have an ongoing product stewardship process that includes the following management practices:

Management Leadership and Commitment

1. **LEADERSHIP:** Demonstrate senior management leadership through written policy, active participation and communication.
2. **ACCOUNTABILITY and PERFORMANCE MEASUREMENT:** Establish goals and responsibilities for implementing product stewardship throughout the organization. Measure performance against these goals.
3. **RESOURCES:** Commit resources necessary to implement product stewardship goals.

Information and Characterization

4. **HEALTH, SAFETY AND ENVIRONMENTAL INFORMATION:** Establish and maintain information on potential health, safety and environmental hazards and exposures from new and existing products.
5. **PRODUCT RISK CHARACTERIZATION:** Characterize new and existing products with respect to their risk, using potential health, safety and environmental hazard and exposure information. Establish a process that initiates re-evaluation.

Risk Management

6. **RISK MANAGEMENT PROCESS:** Establish a system to identify, document and implement risk-management actions -- appropriate to the risk level -- to limit health, safety and environmental risks of products.
7. **PRODUCT AND PROCESS DESIGN AND IMPROVEMENT:** Establish and maintain a program that makes health, safety and environmental impacts and energy and natural resource consumption key considerations in the design and development of products and processes.

Draft

	Total Points
5. Selection	8
a. Are respirators selected on the basis of hazard?	
b. Are respirator systems NIOSH approved?	
c. Do respirators in use match the approved list?	
d. Are respirators selected in accordance with ANSI standards?	
e. Does procedure cover respirators for specific jobs?	
6. Maintenance	8
a. Are respirators maintained properly?	
b. Does procedure identify who can repair respirators and to what extent?	
7. Care	7
a. Are respirators cleaned and stored as required?	
b. Are respirators disinfected as required?	
8. Auditing	7
a. Is an annual audit performed and records kept?	
b. Are uncertified employees allowed to use respirators?	
9. Breathing Air Quality	7
a. Is breathing air quality checked as required?	
b. Are records of quality checks kept?	
c. Are air cylinders marked as required?	
10. Responsibilities	6
a. Are responsibilities assigned?	
11. Contractors	5
a. Are contractors in compliance?	

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Dealt

	Total Points
12. Work Area Surveillance	5
a. Is work area surveillance performed as required?	
13. Emergency Rescue (IDLH)	5
a. Are IDLH emergency rescue procedures/ performance in compliance with standards?	
14. Hose Fittings	2
a. Are fittings used on respiratory equipment unique and common for all equipment?	
15. Prescription Glasses	2
a. Are prescription glasses and inserts provided?	

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Draft

BENZENE STANDARD COMPLIANCE

REGULATED AREAS

YES NO

- | | | | |
|--------|--|-----|-----|
| (d) 1. | Has a determination of the need for regulated areas been made? (Documentation Required and Reviewed) | [] | [] |
| 2. | If regulated areas exist, is access limited to authorized personnel. (Access policy should be clear i. e. in writing or posted.) | [] | [] |
| 3. | Are regulated areas clearly demarcated?
(Note methods:) | [] | [] |

MONITORING

- | | | | |
|--------|--|-----|-----|
| (e) 1. | Has an initial monitoring survey been done to determine employee exposures? | [] | [] |
| 2. | Were all job classifications potentially exposed evaluated? | [] | [] |
| 3. | Is the initial determination documented or readily identifiable? | [] | [] |
| 4. | Did the initial determination include short-term (15-minute TWA) determinations? | [] | [] |
| 5. | Did the initial determination indicate the need for additional or periodic monitoring. | [] | [] |
| 6. | Is periodic monitoring done? | [] | [] |
| 7. | If periodic monitoring was done and has been stopped, is the determination documented. | [] | [] |
| 8. | Have changes in production, process control equipment, or work practices occurred since the initial determination? (No Points) | [] | [] |
| | If so, has additional monitoring been done? | [] | [] |
| 9. | Has monitoring been done after clean-up of leaks, spills, or other events resulting in unusual exposure conditions? | [] | [] |
| 10. | Did the initial monitoring and analysis meet the requirements of 1910.1028? (95% confidence of $\pm 25\%$) | [] | [] |
| 11. | Does continuous monitoring meet the accuracy requirements of 1910.1028? | [] | [] |

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- | | | |
|---|-----|-----|
| 12. Are employees notified of the monitoring results?
(Note method:) | [] | [] |
| 13. Are employee notifications done within 15 days of results? | [] | [] |
| 14. When employee exposures exceed the PEL's,
do the notifications contain the corrective action
to be taken? | [] | [] |

(EXAMPLES OF 12, 13, AND 14 SHOULD BE REVIEWED)

METHODS OF COMPLIANCE

- | | | |
|--|-----|-----|
| (f) 1. Are engineering controls in place to control
recognized exposure sources? | [] | [] |
| 2. Have any exposures exceeded 1.0 ppm 8-hour TWA or
5.0 ppm TWA STEL? | [] | [] |
| 3. If yes, has a compliance program been developed? | [] | [] |
| 4. Does the program include: | | |
| A. Schedule of (or history of) development
and implementation of engineering and work
practice controls. | [] | [] |
| B. Has the plan been updated regularly? | [] | [] |

COMMUNICATION

- | | | |
|--|-----|-----|
| (j) 1. Do regulated areas exist?
If yes, | [] | [] |
| (a) Are entrances signposted in accordance with
1910.1028. | [] | [] |
| 2. Have all containers containing greater than 0.1% of
benzene been identified? | [] | [] |
| 3. Are all containers containing greater than 0.1% of
Benzene labeled in accordance with 1910.1028? | [] | [] |

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