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ABERDEEN CHEMICAL PLANT SAFETY AND HEALTH MANUAL
ABERDEEN MISSISSIPPI

SUBJECT: Hazard Communication Program

EFFECTIVE DATE: _____

PREPARED BY: _____ SAFETY DIRECTOR

APPROVED BY: _____ PLANT MANAGER

VISTA

I. General

The Aberdeen Chemical Plant will maintain a positive, on-going program to inform and train employees on hazardous chemicals with which they work or to which they may be exposed. For the program to be successful, certain responsibilities must be executed as follows:

A. Management

Management is responsible for providing the resources necessary to develop, implement, and audit the program's effectiveness. Each level of management will have varying degrees of responsibility based on its particular function.

B. Employees

Each employee is required to be an active participant in the program to the degree required by his/her job function.

II. Program Elements

The Aberdeen Chemical Plant's Hazardous Chemical Communication Program will consist of the following items:

- A. Chemical Inventory Control Program - An approval procedure, including a continual review of chemicals and an assessment of their hazards, for chemicals brought into the plant.
- B. MSDS Files - A system of maintaining readily accessible copies of hazardous materials safety data sheets (MSDS's) in each work area.

II. Program Elements - continued

- 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 hazardous chemicals they may encounter during their work.
- F. Employee Training - A program for training employees on the hazards associated with chemicals with which they work.

III. Chemical Inventory Control ProgramA. Responsibilities1. Safety Supervisor

The Safety Supervisor shall conduct an on-going program of determining the hazards associated with each chemical to be used in the plant. The determination will include reference to manufacturer-supplied material safety data sheets. He will maintain the list of chemicals approved for purchase and use at the plant.

2. Warehouse/Purchasing Supervisor

The Warehouse/Purchasing Supervisor shall assure that all chemicals purchased for use and/or received are on the approved chemical list. If a purchase requisition is submitted for a chemical not on the approved list, the Safety Department must perform a hazard determination before the chemical can be ordered.

3. Plant Supervisors/Engineers

Anyone desiring to purchase a chemical not on the approved list must notify the Safety Department and the Warehouse/Purchasing Supervisor. He should provide the Safety Supervisor with a MSDS for the chemical so that a hazard determination may be performed. Those wishing to order a new chemical must make provisions to obtain a current MSDS for review and complete the hazard determination procedure prior to submitting a purchase requisition. To insure that an MSDS is available for review, the Warehouse/Purchasing Supervisor will also request an MSDS at the time he/she orders that material.

In some unusual cases, a material may be ordered before the MSDS is received and the hazard determination process completed. If that material is received before the hazard determination is completed, it will be held in the warehouse until that process is complete.

III. Chemical Inventory Control Program - continuedB. Final Approval

After a hazard determination has been conducted and all affected parties have agreed, a chemical being considered for use will be placed on the list of approved chemicals.

IV. Hazardous Materials InformationA. General

The plant will obtain manufacturer-supplied MSDS's for all chemicals used in the plant and make them readily available for employee reference and review.

B. Hazardous Material Reference Books

"Hazardous Material Reference Books" will be made readily available for employee reference and review. The books will be located as follows:

1. The vinyl control room
2. The compound shift supervisor's office
3. The receiving office
- ~~4. The lab supervisor's office~~
5. The first aid station
- ~~6. The office of the Director of Environmental Control~~
- ~~7. The boiler house~~
- ~~8. The Purchasing/Warehouse Supervisor's office~~
9. The Safety Supervisor's office
10. The Maintenance Superintendent's office
11. The Transportation Terminal Manager's office
12. The Plant Manager

Each book will contain a copy of:

1. The plant hazard code.
2. The Vista Product Hazard Determination Procedure.
3. The Plant Hazard Communication Program.
4. The list of chemicals approved for plant use - updated and provided by the Safety Supervisor.
5. The manufacturer-supplied MSDS for each plant chemical.
6. The plant container contents list - a list of plant vessels and the hazardous materials they may contain.

The Safety Supervisor will supply ^{and update} copies of new MSDS's to holders of the hazardous materials reference books.

V. Labeling Requirements

A. General

All containers of hazardous materials shall be adequately labeled. Such labeling will include, as a minimum, a method to identify the container and the hazardous properties of the material(s) within the containers.

Examples of containers include reactors, exchangers, etc. Pipes and piping systems are excluded from the labeling requirement.

B. Hazardous Materials from Suppliers

Hazardous materials from suppliers will be kept in the manufacturer-supplied containers whenever feasible until used. All labeling will be kept intact in the interim.

C. Temporary Storage Containers

Except for color weigh room packaging, all temporary storage containers of hazardous materials must be marked with the same identity and hazard warning that appears on the original, manufacturer-supplied container. Each color weigh room package must have a "compound ticket" affixed to it or the box it is in which lists the identities and hazards of the ingredients.

D. Chemicals for Analytical Use

Manufacturer's labels on containers of analytical chemicals must not be removed, defaced, or obscured in any manner.

E. Hazardous Material Shipment

All hazardous materials shipped from the plant will have appropriate warning labels attached to the containers. Some of these may include samples sent to customers by the laboratory, special analysis samples, products shipped in drums, railcars, or tank trucks.

Each department will ensure that each container of hazardous material shipped from his department is adequately labeled with the appropriate hazard warning labels. This is in addition to any labeling required by DOT, but shall not conflict with DOT markings. Specifically labeled hazardous waste shipments are excluded from this requirement. Any questions on labeling shipped material can be referred to the Safety Department

VI. Contractor Notification

As part of the plant contractor training program, contractor employees will be trained on how to read the hazard warnings on containers and how to use the plant container contents list for cross-referencing. This does not relieve the contractor of his responsibilities to train his employees under the OSHA regulations and in no way encompasses all the training required by the OSHA regulations.

VII. Employee Training

All Vista employees will receive appropriate training on the hazardous materials with which they work. The degree of training required will be dictated by the type of work and the work area. Although some employees do not work with or around such materials and will require little or no training, those who do work with them will receive, as a minimum, the following training:

- A. General industrial hygiene training
- B. How to read an MSDS
- C. Training on hazardous materials in the work area
- D. Retraining when a new chemical hazard is introduced into the work area.
- E. Information on the OSHA Hazard Communication Standard

All new employees will receive this training as part of their initial orientation. Employees transferred from one department to another will be trained on the hazardous materials in their new work area for which they have not been previously trained. Each Department Head will keep training records for those employees trained in their departments.