

DOW CHEMICAL LAD
SOLVENTS / EDC 1

OSHA HAZARD COMMUNICATIONS PROGRAM

IN ACCORDANCE WITH OSHA STANDARD 1910.1200, THE DOW CHEMICAL COMPANY LOUISIANA DIVISION SOLVENTS / EDC 1 PLANT HAS INSTITUTED A "WRITTEN" HAZARD COMMUNICATIONS PROGRAM. THE SOLVENTS / EDC 1 PLANT PROGRAM IS ADMINISTERED BY A NUMBER OF PEOPLE THAT HAVE THE NECESSARY ACCESS TO RESOURCES AND INFORMATION NEEDED TO EXECUTE THE ELEMENTS OF THE PROGRAM. THESE PEOPLE INCLUDE BUT IS NOT LIMITED TO ; PLANT TECHNICAL STAFF, SUPERVISORS, SAFETY, HEALTH AND INDUSTRIAL HYGIENE, AND ENVIRONMENTAL PERSONNEL.

THE SOLVENTS / EDC 1 PLANT PROGRAM IS INCORPORATED WITH THE PROGRAM OF THE DOW CHEMICAL COMPANY LOUISIANA DIVISION.

SOLVENTS / EDC 1 PLANT HAZARD COMMUNICATIONS PROGRAM OUTLINE

- I. COMPANY POLICY
- II. IN-PLANT LABELING POLICY
- III. MATERIAL SAFETY DATA SHEET (OR EQUIVALENT) SYSTEM
- IV. EMPLOYEE TRAINING AND INFORMATION PROGRAM
- V. HAZARDOUS NON-ROUTINE TASKS
- VI. CONTRACTOR INFORMATION
- VII. LIST OF HAZARDOUS CHEMICALS
- VIII. LIST OF HAZARDOUS WASTE
- IX. HAZARDOUS WASTE STORAGE

I. COMPANY POLICY

TO ENSURE THAT INFORMATION ABOUT THE DANGERS OF ALL HAZARDOUS CHEMICALS USED BY THE SOLVENTS / EDC 1 PLANT OF THE DOW CHEMICAL COMPANY, LOUISIANA DIVISION, ARE KNOWN BY ALL AFFECTED EMPLOYEES, THE FOLLOWING HAZARDOUS INFORMATION PROGRAMS HAVE BEEN ESTABLISHED :

OSHA HAZCOM TRAINING AND FILM "WHAT'S IT ALL ABOUT"
CONSEQUENCES OF EXPOSURE TO TOXIC AMOUNTS TRAINING
HAZARDOUS CHEMICAL REVIEW
PROPER PACKAGING OF HAZARDOUS WASTE TRAINING AND FILM
INDUSTRIAL HYGIENE REVIEW
MONTHLY SAFETY MEETINGS
DAILY 5 MINUTE "TAILGATE" SAFETY MEETINGS
ANNUAL RCRA TRAINING CLASS
ANNUAL TSCA TRAINING CLASS
PLANT INDOCTRINATION FILM
PERSONAL PROTECTIVE EQUIPMENT TRAINING

ALL WORK UNITS OF THE COMPANY WILL PARTICIPATE IN THE HAZARD COMMUNICATION PROGRAM. THIS WRITTEN PROGRAM WILL BE AVAILABLE IN THE SOLVENTS / EDC 1 CONTROL ROOM FOR REVIEW BY ANY INTERESTED EMPLOYEE.

II. IN PLANT LABELING POLICY

CONTAINER LABELING

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THE SENIOR LAB SPECIALIST WILL VERIFY THAT ALL CONTAINERS RECEIVED FOR USE WILL BE CLEARLY LABELED AS TO THE CONTENTS, NOTE THE APPROPRIATE HAZARD WARNING, AND LIST THE NAME AND ADDRESS OF THE MANUFACTURER.

THE SENIOR LAB SPECIALIST WILL ALSO ENSURE THAT ALL SECONDARY CONTAINERS ARE LABELED WITH EITHER AN EXTRA COPY OF THE OF THE ORIGINAL MANUFACTURER'S LABEL OR WITH LABELS THAT HAVE THE IDENTITY AND THE APPROPRIATE HAZARD WARNING. FOR HELP WITH LABELING PROBLEMS OR QUESTIONS, CONTACT THE SENIOR LAB SPECIALIST.

ALTERNATIVE CONTAINER LABELING PROGRAM

ANY MATERIAL TRANSFERRED FROM A LABELED CONTAINER TO ANY OTHER CONTAINER NEED NOT BE LABELED AS LONG AS THE PERSON THAT MAKES THE TRANSFER USES THE MATERIAL TRANSFERRED, AND THEN DISPOSES OF THE CONTENTS OF THE CONTAINER AND THE CONTAINER ITSELF. THE POSSESSION OF THE CONTAINER CAN NOT BE TRANSFERRED TO ANY OTHER PERSON'S POSSESSION WITHOUT THE APPROPRIATE LABELING BEING ATTACHED TO THE CONTAINER.

THE SENIOR LAB SPECIALIST WILL REVIEW THE PLANT LABELING PROCEDURE ONCE A YEAR AND UPDATE AS REQUIRED.

EQUIPMENT LABELING

ALL EQUIPMENT IN THE SOLVENTS / EDC 1 PLANT THAT CONTAINS HAZARDOUS MATERIALS WILL BE LABELED IN THE FOLLOWING MANNER :
TANKS, VESSELS, PROCESS DRUMS, EXCHANGERS, COLUMNS, INCINERATORS, REACTORS, ETC., WILL HAVE THE DOW EQUIPMENT IDENTIFICATION NUMBER STENCILED ON IT IN PAINT OF A CONTRASTING COLOR FROM THE EQUIPMENT. PUMPS AND COMPRESSORS WILL HAVE THE DOW IDENTIFICATION NUMBER ON A SIGNBOARD ATTACHED TO THE FIELD SWITCH.

III. MATERIAL SAFETY DATA SHEETS (MSDS)

THE ENVIRONMENTAL SPECIALIST IS RESPONSIBLE FOR ESTABLISHING AND MONITORING THE PLANT MSDS PROGRAM. HE WILL ENSURE THAT PROCEDURES ARE DEVELOPED TO OBTAIN THE NECESSARY MSDS'S AND WILL REVIEW INCOMING MSDS'S FOR NEW OR SIGNIFICANT HEALTH AND SAFETY INFORMATION UPDATES OR CHANGES. HE WILL ALSO ENSURE THAT ALL NEW INFORMATION IS PASSED ON TO AFFECTED EMPLOYEES.

COPIES OF MSDS'S FOR ALL HAZARDOUS CHEMICALS IN USE WILL BE KEPT IN THE HAZCOM MANUAL IN THE SOLVENTS / EDC 1 CONTROL ROOM.

MSDS'S WILL BE AVAILABLE TO ALL EMPLOYEES DURING EACH WORK SHIFT. IF A MSDS IS NOT AVAILABLE, CONTACT THE ENVIRONMENTAL SPECIALIST IMMEDIATELY.

ALTERNATIVE MSDS PROGRAM

IN LIEU OF MSDS'S, DOW T.I.M.E. (TOXICOLOGY, INDUSTRIAL HYGIENE, MEDICAL, ENVIRONMENTAL) DATA SHEETS MAY BE USED. OTHER EXPOSURE INFORMATION MAY BE OBTAINED FROM THE CONSEQUENCES OF EXPOSURE TO TOXIC AMOUNTS FILES IN SOLVENTS / EDC 1 COMPUTER SYSTEM.

IV. EMPLOYEE TRAINING AND INFORMATION

THE TRAINING SUPERVISOR AND ENVIRONMENTAL SPECIALIST ARE RESPONSIBLE FOR THE PLANT EMPLOYEE TRAINING PROGRAM. THEY WILL ENSURE THAT ALL PROGRAM ELEMENTS SPECIFIED BELOW ARE CARRIED OUT

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PRIOR TO STARTING WORK, EACH NEW EMPLOYEE OF THE SOLVENTS / EDC 1 PLANT WILL ATTEND A HEALTH AND SAFETY ORIENTATION THAT INCLUDES THE FOLLOWING INFORMATION AND TRAINING :

- A. AN OVERVIEW OF THE REQUIREMENTS CONTAINED IN THE HAZARD COMMUNICATION STANDARD
- B. HAZARDOUS CHEMICALS PRESENT IN THE WORKPLACE
- C. PHYSICAL AND HEALTH RISKS OF SAID HAZARDOUS CHEMICALS
- D. THE SYMPTOMS OF EXPOSURE TO TOXIC AMOUNTS
- E. HOW TO DETERMINE THE PRESENCE OR RELEASE OF HAZARDOUS CHEMICALS IN THE WORKPLACE
- F. HOW TO REDUCE OR PREVENT EXPOSURES TO HAZARDOUS CHEMICALS THROUGH THE USE OF CONTROL PROCEDURES, WORK PRACTICES, AND/OR PERSONAL PROTECTIVE EQUIPMENT.
- G. STEPS THE PLANT HAS TAKEN TO REDUCE, CONTROL, OR PREVENT EXPOSURE TO HAZARDOUS CHEMICALS
- H. PROCEDURES TO FOLLOW IF AN EMPLOYEE OR EMPLOYEES ARE EXPOSED TO TOXIC AMOUNTS OF HAZARDOUS CHEMICALS
- I. HOW TO READ LABELS AND REVIEW MSDS'S TO OBTAIN HAZARD INFORMATION
- J. LOCATION OF THE MSDS FILES AND THE WRITTEN HAZARD COMMUNICATION PROGRAM
- K. LINE AND EQUIPMENT OPENING PROCEDURES
- L. RED TAG PROCEDURES
- M. LOCKOUT OF ELECTRICALLY POWERED EQUIPMENT
- N. OPERATING OR WORKING ON ELECTRICAL EQUIPMENT
- O. PORTABLE LADDERS
- P. JLG AND FORKLIFT TRAINING
- Q. RESPIRATOR FIT TESTING AND TRAINING
- R. FIRE FIGHTING TRAINING

PRIOR TO INTRODUCTION OF ANY NEW HAZARDOUS MATERIAL TO THE PLANT OPERATIONS, ALL AFFECTED EMPLOYEES WILL BE GIVEN INFORMATION AND TRAINING AS OUTLINED ABOVE FOR THE NEW CHEMICAL HAZARD.

V. HAZARDOUS NON-ROUTINE TASKS

PERIODICALLY, EMPLOYEES ARE REQUIRED TO PERFORM HAZARDOUS NON-ROUTINE TASKS. SOME EXAMPLES OF NON-ROUTINE TASKS ARE :

CONFINED SPACE ENTRIES (VESSEL ENTRY)
TANK CLEANING
PAINTING REACTOR VESSELS

PRIOR TO STARTING WORK ON SUCH PROJECTS, EACH AFFECTED EMPLOYEE WILL BE GIVEN INFORMATION BY QUALIFIED PERSONNEL ABOUT THE HAZARDOUS CHEMICALS THEY MAY ENCOUNTER DURING SUCH ACTIVITY. THIS INFORMATION WILL INCLUDE SPECIFIC CHEMICAL HAZARDS, PERSONAL PROTECTIVE EQUIPMENT USE, SAFETY EQUIPMENT USE, SAFETY PROCEDURES AND MEASURES, AND STEPS THE PLANT IS USING TO REDUCE THE HAZARDS INVOLVED WITH THE TASK, INCLUDING, BUT NOT LIMITED TO, VENTILATION, RESPIRATORS, SAFETY OBSERVERS, HOLE WATCHERS, AND EMERGENCY PROCEDURES.

VI. INFORMING CONTRACTORS

IT IS THE RESPONSIBILITY OF QUALIFIED PERSONNEL TO PROVIDE CONTRACTORS WITH INFORMATION ABOUT HAZARDOUS CHEMICALS THAT THEIR EMPLOYEES MAY BE EXPOSED TO AT THE SOLVENTS / EDC 1 PLANT. ALSO, SAID CONTRACTORS, WILL BE PROVIDED WITH PRECAUTIONS NEEDED FOR PROTECTION OF THEIR EMPLOYEES.

OUTSIDE COMPANIES CONTRACTED FOR WORK IN THE SOLVENTS / EDC 1 PLANT MUST BE CONTACTED BEFORE WORK IS STARTED TO GATHER AND DISTRIBUTE INFORMATION CONCERNING ANY CHEMICAL HAZARD THAT THEY WILL OR MAY BRING INTO THE PLANT.

VII. LIST OF HAZARDOUS CHEMICALS

A LISTING OF ALL HAZARDOUS CHEMICALS USED IN THE SOLVENTS / EDC 1 PLANT IS LOCATED IN THE SOLVENTS / EDC 1 HAZARD COMMUNICATIONS MANUAL LOCATED IN THE SOLVENTS / EDC 1 CONTROL ROOM. THE LISTING IS CROSS-REFERENCED WITH THE EQUIPMENT LIST AND THE MSDS'S FOUND IN THE MANUAL.

VIII. LIST OF HAZARDOUS WASTE

HAZARDOUS WASTE IS GENERATED IN THE SOLVENTS / EDC 1 PLANT AS A BYPRODUCT FROM PRODUCT MANUFACTURING. THESE WASTE ARE SPECIFIC IN SOURCE AND ARE RCRA REGULATED. ALSO DUE TO RCRA REGULATIONS, HAZARDOUS WASTE CAN BE GENERATED FROM PRACTICALLY ALL AREAS IN THE PLANT, INCLUDING CRUDE AND FINISHED PRODUCTS.

SOLID WASTE STREAMS - A LISTING OF SOLID WASTE STREAMS IS KEPT IN THE SOLVENTS / EDC 1 HAZARD COMMUNICATIONS MANUAL.

LIQUID HAZARDOUS WASTE STREAMS - A LIST OF THE LIQUID HAZARDOUS WASTE STREAMS IS KEPT IN THE SOLVENTS / EDC 1 RCRA PERMIT BOOK. THIS PERMIT BOOK IS LOCATED IN THE BUILDING 1701 FILE ROOM. THE LIST INCLUDES, BUT IS NOT LIMITED TO, RCRA HAZARDOUS WASTE CODES, COMPONENTS OF COMPOSITION, AND ORIGIN AND DISPOSAL POINTS. THE LIST IS FORMATTED AS A "RCRA HAZARDOUS WASTE ANALYSIS PLAN".

SOLID HAZARDOUS WASTE STREAMS - A LIST OF THE SOLID HAZARDOUS WASTE STREAMS IS KEPT IN THE SOLVENTS / EDC 1 HAZARD COMMUNICATIONS MANUAL. THE LIST INCLUDES, BUT IS NOT LIMITED TO, RCRA HAZARDOUS WASTE CODES, COMPONENTS OF COMPOSITION, AND POINT OF ORIGIN. THE LIST IS FORMATTED AS A DOW CHEMICAL LOUISIANA DIVISION "UNIFORM (HAZARDOUS) WASTE CHARACTERIZATION".

PROCEDURES FOR PROPER HANDLING AND DISPOSING OF THE ABOVE WASTE STREAMS ARE LOCATED IN THE SOLVENTS / EDC 1 PDP-11 COMPUTER SYSTEM (LASLP1 / LASLP2) AND ARE COMMUNICATED FREQUENTLY THROUGH THE YEAR.

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IX. HAZARDOUS WASTE STORAGE AREAS

THERE ARE SEVERAL AREAS IN THE SOLVENTS / EDC 1 PLANT DESIGNATED FOR HAZARDOUS WASTE STORAGE, BOTH TEMPORARY (90 DAY) AND PERMITTED.

90 DAY CONTAINER STORAGE AREAS :

- # 1 - NORTH SECTION BLOCK 17
- # 2 - SOUTHEAST SECTION BLOCK 16
- # 3 - NORTHWEST BLDG. 1703 BLOCK 17

90 DAY STORAGE TANKS :

- T-106 - NORTH SECTION BLOCK 17
- D-42B - SOUTHEAST SECTION BLOCK 16

PERMITTED HAZARDOUS WASTE STORAGE TANKS :

- D-13 - PER / TET UNIT
- D-15 - PER / TET UNIT
- D-92A - THERMAL OXIDIZER UNIT
- D-700 - THERMAL OXIDIZER UNIT
- D-701 - THERMAL OXIDIZER UNIT
- V-201 - SOUTHEAST OF BLDG. 1716 BLOCK 16
- T-749 - SOUTHEAST OF BLDG. 1716 BLOCK 16

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