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I. Purpose

The purpose of this program is to ensure that the hazards of chemicals stored or used at the Calhoun Mill are evaluated and that information concerning their hazards is communicated to employees and local emergency response personnel. This policy is intended to comply with OSHA Standard 29 CFR 1910.1200 and the Tennessee Hazardous Chemical Right-To-Know Law, Chapter 0800-1-9.

II. Scope

This policy applies to **Resolute Forest Products** employees, contractors, vendors, and visitors who store or use hazardous chemicals at the Calhoun facility .

III. Definitions

- A. **Article** – a manufactured item other than a fluid or particle formed into a specific shape or design, under normal conditions does not release more than minute or trace amounts of a hazardous chemical, and poses no physical or health hazard.
- B. **Chemical Inventory** – a list of chemicals on **Resolute Forest Products** property that has been identified as being hazardous; also called Workplace Chemical List.
- C. **Container** – any bag, barrel, bottle, can, cylinder, drum, reaction vessel, storage tank, etc., that contains a hazardous chemical. Pipes, piping systems, engines, fuel tanks, or operating systems in a vehicle are not considered containers.
- D. **Foreseeable Emergency** – any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of hazardous chemical into the workplace.
- E. **Hazard Classification** – the NFPA Standard system rates hazardous of materials based on health, flammability, and reactivity. Note: Although classified, OSHA does not cover Class IIIB combustible liquids.
- F. **Hazard Warning** – words, pictures, symbols, or combination appearing on a label or other appropriate form of warning which convey the specific hazards of the chemical(s) in the container, including target organ effects.
- G. **Hazardous Chemical** – Any chemical which is a physical or health hazard or, if a mixture which has not been evaluated as a whole to determine its hazardous nature, contains one percent (1% by weight or volume) or greater of a chemical which is **considered** a health hazard or contains one – tenth of one percent (0.1% by weight or volume) or greater of a component considered to be a carcinogen.
- H. **Label** – written, printed or graphic material displayed on or affixed to containers of hazardous chemicals.
- I. **Material Safety Data Sheets (MSDS)** – electronic or printed material concerning a hazardous chemical which is prepared in accordance with Title 29, Code of Federal Regulation, Part 1910, Section 1200, paragraph (g), (29 CFR 1910).

IV. Policy & Procedures

The following guidelines will address the specific labeling methods to be utilized, MSDS location, the proper method for bringing new chemicals into the facility, and the training to be **conducted**.

A. Labels and Other Forms of Warning

The following labeling system applies to all hazardous chemicals used at the Calhoun mill:

1. Tanks and Vessels:

- a. Permanent vessels and tanks will be labeled with signs containing the following information:
 1. Common chemical name
 2. Hazard classification and warning (Example: chlorine – poison gas, turpentine – class IC flammable)
 3. Targeted personal health hazard and target organ effects
 4. Required personal protection equipment for entry
 - ~~5.~~ “Confined Space Entry Permit Required” statement (**see confined space policy**)
 6. NFPA 704 M Diamond Placard
 7. D.O.T. class and ID number, if applicable
 8. Capacity of the vessel
 - b. Tanks and vessels will be identified by an attached sign(s) with embedded graphics.
 - c. The text and layout of each sign will be uniform throughout the Calhoun Mill (see Addendum B)
 - d. Signs will be displayed so they are clearly visible from all normal approaches and are unobstructed by plant equipment.
 - e. Signs shall be replaced whenever they become unreadable, damaged, or non-functional.
 - f. A **confined space** entry sign must be located at all tank/vessel entry points.
2. Process lines will be labeled with the common name of the chemical and hazard. (example: Turpentine Vent Line – Flammable).
 3. For totes and bulk containers, including temporary tanks, alternative labeling methods may be used. However, as a minimum, the common name, hazard classification, and the PPE requirements must be clearly marked and visible.
 4. Small containers used for temporary oil storage/dispensing by Mill Stores will be accompanied with a label. The individual requesting the container will be responsible for marking the container with the chemical name and hazard warning information. A common list of chemicals and hazard warning information will be made available by Mill Stores.
 5. Other small containers including laboratory chemicals used in the mill will be marked with a label identifying the chemical common name, the hazard warning, and include an NFPA Diamond.

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6. Labels provided on a container when received at the Calhoun Mill shall not be removed or defaced. This includes any D.O.T. or other shipping labels. If tote bins are to be re-used, they must be filled with the same chemical that was previously in the container. Tote bins intended for one-time use or where the product is no longer being used will be properly cleaned, labels removed, and the tote bins made ready to pick up and be taken from the mill site. If there is still chemical in a tote that needs to be cleaned, contact the Environmental Department before disposing of the contents of the tote bin.
7. General work areas in which non-containerized hazardous chemicals are generated or produced as a result of the process or operation will be identified with a sign warning of the hazardous chemical. (Example: welding fumes in maintenance shops, carbon monoxide from powered industrial truck exhaust in a warehouse, ClO₂, etc.)

B. Material Safety Data Sheets (MSDS)

1. MSDS for all chemicals used, stored or generated at the mill will be coordinated by the Environmental and Technical Departments.
2. MSDS will be maintained in the MSDS online database. The database can be accessed from any mill computer through the **Resolute Forest Products** Safety intranet page. A hard copy will be maintained and kept by the Technical Department.
3. Before a new chemical is brought into the mill, the MSDS will be reviewed for hazardous chemicals by Environmental, Safety and the Operating Department Manager. A "Trial Authorization Request" form will be completed and approved by Environmental, Safety and the Operating Department Manager where the chemical is to be used. (See Addendum A)
4. New chemicals will be added to the Chemical Inventory and the on-line MSDS database.
5. For hazardous chemicals produced internally (such as carbon monoxide, ClO₂ and welding fumes), an MSDS may be used or developed to satisfy the physical and health hazard communication requirements.
6. No hazardous chemical shall be used on the mill site until an MSDS is obtained, the new chemical approved, and information communicated to employees working **with** the hazardous chemicals.
7. If a MSDS for a hazardous chemical is not made available, the Purchasing Department will request, in writing, a MSDS from the manufacturer. If a MSDS is not provided, the product will not be used at the Calhoun Mill.
8. Each MSDS shall be in English and shall contain information as outlined under Section 0800-1-9-.05 (Material Safety Data Sheets) of the Hazardous Chemical Right-To-Know Law.

C. Employee Information and Training

1. Employees will be informed and trained on hazardous chemicals in their work area at the time of initial assignment and whenever a new hazardous chemical is introduced into their work area, or whenever they are assigned to a different work area. Refresher training will be conducted periodically.
 - a. Employees will be trained on the following categories:
 1. What the training is about.
 2. What hazardous chemicals they are exposed to during normal use or in a foreseeable emergency.

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3. Where the hazardous chemicals are present.
 4. What are the short and long term health effects.
 5. How can you detect if you are overexposed to the chemical.
 6. How to protect yourself.
 7. Review the MSDS and how to access the online MSDS database.
2. Employees will be trained on the hazards associated with hazardous chemicals by one or more of the following methods:
 - a. Training modules with knowledge checks for each chemical identified as “hazardous” are compiled and are available. A copy of this material is kept in the Safety Department.
 - b. Review of MSDS and the appropriate warning material.
 - c. Video review of hazardous chemicals.
 - d. Computer Based Training Modules.
 3. Employees involved in non-routine tasks (such as tank cleaning and maintenance) will be informed of the potential hazards and trained by the individual supervising the job.
 4. Other employers who have employees at the Calhoun mill who may be exposed to hazardous chemicals will be provided access to the written Hazard Communication Program during their Safety orientation. Employees will be shown MSDS or other hazardous warning material for chemicals which they may be exposed to and will be informed of any measures necessary to protect themselves during normal operating conditions or emergencies. The hazardous chemical labeling system will be reviewed with them.
 5. Contract supervision who have employees working at the Calhoun mill will be trained in the Mill Hazard Communication Program and required to train their employees.
 6. Training on the Mill Hazard Communication Program will be conducted periodically and documented.
Note: Training is required initially and when new hazardous chemicals are introduced.
- D. Chemical Inventory List (Workplace Chemical List)
1. An inventory list of all chemicals in the workplace will be maintained and updated annually by the Environmental Group. The location and type of hazardous chemicals produced in the workplace will be added to the inventory list.
 2. The Safety Department, with assistance from the Environmental Department, will determine if materials are hazardous by one or more of the following methods:
 - a. Review product MSDS for hazardous classification.
 - b. Material is a flammable or combustible liquid, compressed gas, explosive, organic peroxide, oxidizer, pyrophoric or water reactive.
 - c. Chemicals listed with Permissible Exposure Limit (PEL) under 29 CFR Part 1910, Subpart Z of the TOSHA Standard.
 - d. Chemicals listed with Threshold Limit Values (TLV) and physical agents as outlined in American Conference of Governmental Industrial Hygienists (ACGIH) latest edition.
 - e. Chemicals listed as carcinogens or potential carcinogens by the National Toxicology Program (NTP) annual Report on Carcinogens or International Agency for Research on Cancer (IARC) Monographs (latest editions).



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3. A Chemical Inventory (Workplace Chemical List) containing the hazardous chemicals onsite **has been** developed. It **was** submitted as required to the Tennessee Department of Labor, Calhoun Fire Department and Charleston Fire Department. The List will include the product name, chemical abstract number, name of hazardous chemical(s), location of chemical by department, and quantity. The Environmental Group will be responsible for sending this information to the appropriate agencies and the Safety Department.

E. Trade Secrets

The information provided in the Calhoun Mill MSDS is not considered to be a Trade Secret. In the event **Resolute Forest Products** MSDS information is considered to be a Trade Secret, disclosure of proprietary information will be provided upon written request. Information will be provided to Emergency Personnel as needed.

V. Responsibilities

A. Health and Safety Manager

1. Ensure the program is implemented and communicated to employees.
2. Determine and review the labeling system to identify hazardous chemicals.
3. Coordinate the development of training material and review as needed.
4. Conduct monitoring and evaluation of workplace exposures as needed.
5. Selection of control measures to reduce and/or eliminate employee exposure to hazardous chemicals.
6. Evaluate new chemicals that are **to be** brought into the mill.
7. Audit/inspect for proper storage, handling, and labeling of hazardous materials.
8. **Assist in the development of up-to-date MSDS for hazardous chemicals generated by the Calhoun Mill Operations.**

B. Environmental Director and Technical Services

1. Prepare up-to-date MSDS, forward them to appropriate departments, and develop MSDS for hazardous chemicals generated by the Calhoun Mill Operations.
2. Determine proper procedures for clean-up and disposal for hazardous chemical spills and leaks.
3. Audit/inspect for proper storage, handling and labeling of hazardous materials.
4. Assist Health and Safety Department in the evaluation of new chemicals for environmental, safety, and health concerns when new chemicals are **to be** introduced to the Calhoun mill.
5. Distribute Chemical Inventory (Workplace Chemical List) to local Fire Departments and the Tennessee Department of Labor, Division of Occupational Safety and Health, as required.
6. Update and maintain a Chemical Inventory list and workplace chemical list.
7. Periodically review chemicals to determine when a less hazardous chemical could be substituted.

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C. Department Managers

1. Ensure MSDSs are readily available to employees, contractors, vendors, and visitors when they may be exposed or upon request.
2. Ensure employees receive initial training on new departmental hazardous chemicals and periodic **refresher** training.
3. Ensure that containers, process tanks, vessels/piping and other containers in the department are labeled in accordance with this program.
4. Notify Safety and Health personnel when employees complain of symptoms or irritation from potential exposure to hazardous chemicals.
5. Ensure that new chemicals **to be** used or stored in the department are approved before being brought on the mill site.

D. Employees

1. Know where to locate an MSDS when working in a department.
2. Read, understand, and follow the hazardous chemical warning labels.
3. Ensure that hazardous chemicals are labeled as outlined in the program, and report unlabeled containers to foreman/supervisor.
4. Follow safety procedures regarding the use of hazardous chemicals, including wearing proper personal protective equipment.
5. Notify supervisor of any exposure to hazardous chemicals and report to Health Services. Report all spills or leaks immediately to supervisor or appropriate emergency response personnel.
6. Isolate spill area or leaks in accordance with emergency response plan and notify emergency response personnel at ext. 7230.
7. Clean up spills or leaks of hazardous substances if it is within the skill, equipment availability and protective equipment capabilities of the operating department.

E. Foreman and Supervisor

1. Ensure all hazardous chemical containers are labeled according to this program.
2. Ensure employees are trained in personal responsibility of this program.
3. Notify department managers when an employee may be exposed to a hazardous chemical.
4. Review the hazards of the chemicals to which employees may be exposed to.
5. Provide information about hazardous chemicals in the work area to employees when asked.
6. Know how to access an MSDS and how to read and share information with employees.



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F. Purchasing Manager

1. Ensure that a MSDS for hazardous chemicals is on hand before the chemical is **brought into** the mill.
2. Ensure that new hazardous chemicals are evaluated and approved by Health/Safety and Environmental Director/Technical Department before being brought on site.
3. Ensure all containers of hazardous chemicals purchased are labeled according to this program.
4. Negotiate the return of empty containers to the manufacturer as appropriate.

G. Mill Stores

1. Small containers issued by Mill Stores will be affixed with a label identifying the hazardous chemical and the hazard warning.
2. Bulk chemicals received will be as described in Quality System #OS-OP-MSF-1001.

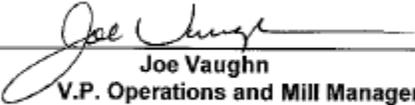
VI. Addendum/Exceptions

- A. Chemical Approval Request Form
- B. Chemical Approval SOP
- C. Labeling
- D. Work Place Chemical Inventory List

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