St Croix Chipping, LLC

Woodland Pulp LLC

144 Main St.
Baileyville, Maine

Valid for 24 hours after printing: 1/7/2025 2:25 PM

Hazardous Communications & Chemical Approval Procedure

Document No: SAF/HAZ
Issue #: 4
Date of Issue: 02/01/2017
Effective Date: 02/01/2017
Reviewed: 02/16/2023

Authorized By:

Brandon Ireland Safety Manager

USE OF DOCUMENT

The master copy of this document resides in electronic format on WP's intranet. Printed copies of this document are for convenience only. Verify that the issue number of this document matches the current issue number of the electronic master document before use.

Table of Contents

1. Purpose
2. Scope
3. Hazard Communication Standard
4. Procedure
   4.1 Receiving and Container Labeling
   4.2 Safety Data Sheets (SDS)
   4.3 Employee Training and Information
   4.4 Personal Protective Equipment (PPE)
   4.5 Hazardous Non-Routine Tasks
   4.6 Chemicals in Unlabeled Pipes
5. Chemical Approval Policy
6. Contractors
7. Distribution

1. Purpose

The purpose of this procedure is to aid in the safe storage, use and handling of hazardous materials as well as ensure accessibility to SDS documentation at St. Croix Chipping and Woodland Pulp (which will be mentioned as “The Company” from here on out.) To ensure that information about the dangers of all hazardous chemicals used by The Company is known by all affected employees, the following hazard communication procedure has been implemented. Under this program, workers will be informed of the requirements of the OSHA Hazard Communication Standard, the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and SDSs.

This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available in Compliant Pro for any interested worker.

This written Hazard Communication Program has been developed in compliance with the Federal Hazard Communication Program 29 CFR 1910.1200 (HCS) and the State of Maine Right-To-Know Law, Chapter 22, Title 26, Maine Revised Statutes Annotated 1984, Public Law, Chapter 823.

The Training Manager is the program coordinator, with overall responsibility for the program including reviewing and updating this plan as necessary.

2. Scope

This procedure applies to all employees of the company which include Woodland Pulp LLC and St. Croix Chipping, employees, contractors and service providers while on The Company property.

3. Hazard Communication Standard

The OSHA Hazard Communication Standard requires that information about chemical hazards be conveyed on labels using quick visual notations to alert the user, providing immediate recognition of the hazards. Labels must also provide instructions on how to handle the chemical so that chemical users are informed about how to protect themselves.

While labels provide important information for anyone who handles, uses, stores, and transports hazardous chemicals, they are limited by design in the amount of information they can provide. Safety Data Sheets (SDs), which must accompany hazardous chemicals, are the more complete resource for details regarding hazardous chemicals.

The Hazardous Communication Standard (HCS) requires the label to have the following information:

- Name, address and contact number for the chemical manufacturer, importer or other responsible party.

- Product Identifier

  The Product Identifier is how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the SDS.

- Signal Word

  Signal words are used to indicate the relative severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, “Danger” and “Warning”. “Danger” is used for the more severe hazards and “Warning” is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a “Danger” signal word and another warrants the signal word “Warning”, then only “Danger” should appear on the label.

- Hazard Statement(s)

Hazard statements describe the nature of the hazard(s) of a chemical including, where appropriate, the degree of hazard. For example: “Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.” All the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards no matter what the chemical is or who produces it.

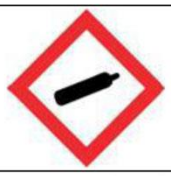
- Precautionary Statement(s)

  Precautionary statements describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statements:
  1. Prevention – to minimize exposure
  2. Response – in case of accidental spillage or exposure emergency response
  3. Storage
  4. Disposal

  For example, a chemical presenting a specific target organ toxicity (repeated exposure) hazard would include the following on the label: “Do not breathe dust/fumes/gas/mist/vapors/spray. Get medical advice/attention if you feel unwell. Dispose of contents/container in accordance with local/regional/national and international regulations.”

- Pictogram(s)

  Pictograms are graphic symbols used to communicate specific information about the hazards of a chemical. On hazardous chemicals being shipped or transported from a manufacturer, importer or distributor, the required pictograms consist of a red square frame set at a point with a black hazard symbol on a white background, sufficiently wide to be clearly visible.

Hazard Symbols (to be used in pictograms for substances of the particular class)		
FLAME OVER CIRCLE—USED FOR THESE CLASSES : ▪ Oxidizers	**FLAME—USED FOR THESE CLASSES:** ▪ Flammables ▪ Self Reactives ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Organic Peroxides	**EXPLODING BOMB—USED FOR THESE CLASSES:** ▪ Explosives ▪ Self Reactives ▪ Organic Peroxides
		
SKULL & CROSSBONES—USED FOR THESE CLASSES: ▪ Acute toxicity (severe)	**CORROSION—USED FOR THESE CLASSES:** ▪ Corrosives	**GAS CYLINDER—USED FOR THESE CLASSES:** ▪ Gases Under Pressure
HEALTH HAZARD—USED FOR THESE CLASSES: ▪ Carcinogen ▪ Respiratory Sensitizer ▪ Reproductive Toxicity ▪ Target Organ Toxicity ▪ Mutagenicity ▪ Aspiration Toxicity	**ENVIRONMENTAL HAZARD—USED FOR THESE CLASSES:** ▪ Environmental Toxicity	**EXCLAMATION MARK—USED FOR THESE CLASSES:** ▪ Irritant ▪ Dermal Sensitizer ▪ Acute toxicity (harmful) ▪ Narcotic Effects ▪ Respiratory Tract Irritation

While the Globally Harmonized System of classification and Labelling of Chemicals (GHS) uses a total of nine pictograms, OSHA only enforces the use of eight. The environmental pictogram is not mandatory but may be used to provide additional information.

It is important to note that the OSHA pictograms do not replace the diamond-shaped labels that the U.S. Department of Transportation (DOT) requires for the transport of chemicals, including chemical drums, totes, tanks or other containers. Those labels must be on the external part of a shipped container and must meet the DOT requirements set forth in 49 CFR 172, Subpart E.

4. Procedure

4.1 Receiving and Container Labeling

All chemicals in totes, drums, or bags (not bulk) are received at the Woodland Pulp storeroom. Once received by the storeroom, the chemicals are stored until requested.

The Woodland Pulp Storeroom Receiving verifies that all containers of chemicals received are labeled, marked or tagged with:

- The name, address and contact information for the manufacturer, importer, or other responsible party
- Product identifier
- Signal Word (if required)
- Hazard statements (if required)
- Precautionary statement (if required)
- Pictograms (if required)

The Receiving department ensures that the labels or other forms of warning are:

- Legible
- In English; and
- Prominently displayed on the container(s)

If no label exists or it is damaged and illegible the Receiving department will not remove the containers from the truck or rail car. It is both Woodland Pulp and St Croix Chipping policy that no chemical containers will be accepted until all of the above is identified.

It is the responsibility of the department supervisors, and/or other involved party to ensure that all secondary (any container other than the original as supplied by the manufacturer) containers are labeled with the required information. The Safety Coordinator can aid with proper labeling.

Chemicals shipped in bulk tanker truck loads are cleared through security, who verify the correct documentation is present with the shipment. The required DOT placarding on the delivery tanker truck is the responsibility of the company shipping the product. SCT and the supplier of the chemical are jointly responsible for the required labeling of the bulk storage tank.

4.2 Safety Data Sheets (SDS)

i. SDS sheets are required for all chemicals used on-site for both Woodland Pulp LLC and St. Croix Chipping.

ii. A hard copy of all SDS's is kept in the Medical Department. A database, MSDSOnline, is available throughout the mill and the SDS sheets can be accessed at any time. SDS sheets are also on the mill's intranet site and can be accessed at any time.

iii. Archived SDS must be retained for 30 years after the discontinuation and removal of the chemical.

4.3 Employee Training and Information

The training manager is responsible for the employee training program and ensures that each new employee is given a health and safety orientation, prior to starting work. The information and training include the following:

- An overview of the requirements contained in the hazard communication standard and the location of a copy of the standard for the employee review
- Location and availability of the written communication program
- Physical and health effects and location of any hazardous chemicals
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area
- Steps the company has taken to lessen or prevent exposure to these chemicals

General chemical safety and Hazard Communication training is provided via computer-based training program in Vivid Learning / HSI.

4.4 Personal Protective Equipment

Before an employee begins to work in an area where chemicals are stored or are in active use in the mill, their trainer should ensure that the employee familiarizes themselves them self with the following topics:

- Emergency procedures to follow if the employee is exposed to these chemicals
- Instruction regarding how to read labels and review SDS to obtain appropriate hazard information
- Location of SDS file and hazardous chemical list
- Explanation of non-routine exposure
- Hazards posed by unlabeled pipes and piping systems

Before a new hazardous chemical is introduced into any work area, the department supervision is to give each employee assigned to the work area the information listed above.

Note: In the case where two or more chemicals are mixed to form a new chemical, such as the biocide used on the tissue machines, it is required to have the SDS sheet on file for the product produced by the chemical reaction. A simple admixture of two or more chemicals, where a new chemical compound is not formed, does not require a separate SDS sheet.

4.5 Hazardous Non-routine Tasks

Periodically employees are required to perform potentially hazardous tasks. Prior to starting work on such projects, each affected employee is given information by their Team Leader or the area superintendent about the hazardous chemicals to which they may be exposed. This information includes:

- Specific chemical hazards
- Protective safety measures the employee must take
- Measures the company has taken to reduce potential hazards. Such measures may include ventilators, respirators, and the response procedures.

4.6 Chemicals in Unlabeled Pipes

While The Company has made every effort to label all chemical pipes, lines and hoses, work activities may sometimes be required in areas where chemicals are transferred through unlabeled pipes, lines or hoses. Prior to starting work in these areas, the employee must contact their Area Operations Supervisor for information regarding:

- Chemicals in the pipes and a copy of the SDS sheet
- Potential hazards
- Safety precautions which should be taken

5. Chemical Approval Policy

To manage the use of hazardous chemicals, the following approval policy will be utilized for the purchase of new chemicals.

- The Area Superintendent and/or their representative requesting the new chemical will obtain a safety data sheet (SDS) and the associated documentation.
- When the safety data sheet has been obtained, the requester will complete the chemical approval form (see Attachment), attach the SDS and forward the document to the Environmental department for approval.
- The Environmental department will forward the request to the Safety department.

- The Safety Manager and the Environmental Manager or their representative will review the documents and any other relevant information to make a determination.
- Upon completion of the review process, the safety department will forward a copy of the approved request to the Vice President. If the request is not approved the safety manager, the environmental manager or their representative will notify the originator of the reasons for the disapproval.
- Reasons for disapproval include but are not limited to; chemical is or contains any substance which is not currently permitted in the mill or authorized by the Clean Water Act, FDA and the like.

6. Contractors

It is the responsibility of all contractors to follow The Company's Hazard Communication Program. This is covered in the safety orientation required for all contractors, vendors and visitors entering the mill.

Contractors bringing any chemical(s) into the mill property are required to provide a copy of the SDS.

7. Distribution

WP Intranet