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# **HEALTH AND SAFETY PROCEDURE 400 – Hazard Communication**

#### 1.0 PURPOSE

The purpose of this document is to ensure all Westlake, Plaquemine Operations (Westlake) employees are knowledgeable about hazards that may be present within their workplace. This written program meets the requirements of the OSHA Hazard Communication Regulation (29 CFR 1910.1200).

#### 2.0 SCOPE

Westlake is dedicated to the safe production and use of chemicals. Employees are expected to perform their duties in a safe and conscientious manner and be knowledgeable of the chemical hazards in their work areas. Employee awareness and training on the subject of hazardous chemicals are accomplished through initial employee orientation, employee training, Safety Data Sheets and container labeling.

#### 3.0 **DEFINITIONS**

- **3.1** Article A manufactured item:
  - 3.1.1 Which is formed to a specific shape or design during manufacture;
  - 3.1.2 Which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
  - 3.1.3 Which does not release, or otherwise result in a hazardous chemical under normal conditions of use.
- **3.2** Chemical Any element, chemical compound, or mixture of elements and/or compounds.
- 3.3 Chemical Name The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.
- **3.4 Common Name -** Any designation or identification such as code name, code number, trade name, brand name, or generic name used to identify a chemical other than by its chemical name.
- **3.5 Container -** Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that could contain a hazardous chemical. For purposes of this policy, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.



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- **3.6 Designated Representative -** Any individual or organization to which an employee gives written authorization to exercise such employee's rights under this policy.
- **3.7 Distributor -** A business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.
- **3.8 Employee** A worker who may come in contact with hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers, such as office personnel, who encounter hazardous chemicals only in non-routine, isolated instances are not covered.
- **3.9** 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 a hazardous chemical into the workplace.
- **3.10 Hazardous Chemical -** A chemical for which there is statistically significant evidence, based on at least one study conducted in accordance with scientific principles, which establishes the potential for acute or chronic health effects.
- **3.11 Hazard Statement -** a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- 3.12 Health Hazard Hazardous chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic systems, or agents which damage the lungs, skin, eyes, or mucous membranes.
- **3.13 Hazard Warning -** Any words, pictures, symbols, or combination thereof is appearing on a label or other appropriate form of warning which conveys the hazard(s) and target organ effects of the chemical(s) in the container(s).
- 3.14 Identity Any chemical or common name which is indicated on the safety data sheet (SDS) for the chemical. The identity used will permit cross-references to be made among the required list of hazardous chemicals, the label, and the SDS.
- **3.15 Immediate Use -** The hazardous chemical will be under the control of and used only by the employee who transfers it from a labeled container and only within the work shift during which the chemical is transferred.
- 3.16 Label Any written, printed, or graphic material displayed on or affixed to



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containers of hazardous chemicals.

- **3.17 Label Elements –** the specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.
- **3.18 Physical Hazard -** A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive), or water-reactive.
- **3.19 Pictogram** A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category.
- **3.20 Precautionary Statement -** A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.
- **3.21 Produce -** To manufacture, process, formulate, or repackage.
- 3.22 Product Identifier the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.
- **3.23** Safety Data Sheet (SDS) Written or printed material concerning a hazardous chemical which is prepared in accordance with the SDS section of Westlake's Hazard Communication Program.
- **3.24 Signal Word -** a word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.
- **3.25 Specific Chemical Identity -** The chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.
- 3.26 Trade Secret Any confidential formula, pattern, process, device, information, or compilation of information that is used in an employer's business, and that gives Westlake an opportunity to obtain an advantage over competitors who do not know or use it.



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- **3.27** Use To package, handle, react, or transfer.
- **3.28 Work Area -** A room or defined space in a workplace where hazardous chemicals are produced, stored or used, and where employees are present.
- **3.29 Workplace -** An establishment, job site, or project, at one geographical location containing one or more work areas.

#### 4.0 RESPONSIBILITIES

# 4.1 Health and Safety (H&S):

- 4.1.1 Implement a Hazard Communication Program.
- 4.1.2 Provide Westlake employees, all contractor personnel and service personnel with information on hazardous chemicals in the work place.
- 4.1.3 Provide Westlake employees with training on the Hazard Communication Program and its elements at the time of assignment and periodically thereafter.
- 4.1.4 Maintain an up-to-date inventory of all SDSs for hazardous chemicals. SDS's are maintained electronically through an online service, Sphera®. The electronic SDSs are accessible via any computer console with Intranet access. The path is connectone.westlake.com, Departments (dropdown), HS&E, and SDS Portal button. Selection of Plaquemine will provide access to the Plaquemine site SDSs.
  - Currently, a digital master copy is maintained at the Main Gate Security. The master copy is updated quarterly.
- 4.1.5 Ensure that the Hazard Communication Program and SDSs are readily available, upon request, to employees, on-site contractors, their designated representatives, Assistant Secretary and Director, in accordance with Westlake's Employee Workplace Monitoring and Medical Records Program.
- 4.1.6 Conduct a review of Westlake's Hazard Communication Program at least annually.
- 4.1.7 Inventory and list all hazardous chemicals in the workplace using the identity referenced on the SDS.



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#### 4.2 **Department Supervision:**

- 4.2.1 Learn, understand, and follow Westlake's Plaquemine Complex, Hazard Communication Program.
- 4.2.2 Provide employees with information and training on specific chemical hazards in their work area upon initial assignment and annually thereafter.
- 4.2.3 Provide training to employees as new hazardous chemicals or procedures are introduced into their work area.
- 4.2.4 Inform employees of the hazards of non-routine tasks and hazards associated with chemicals contained in unlabeled pipes in their work area.
- 4.2.5 Ensure that all containers of hazardous chemicals in their work area are properly labeled. (See definition of containers to determine which plant containers need labels)
- 4.2.6 Confer with Product Stewardship or Industrial Hygiene on questions concerning specific container labeling data.
- 4.2.7 Each hazardous chemical container in the workplace will be labeled in accordance with Section 5.5 Container Labeling.

#### 4.3 **Employees**

- 4.3.1 Learn, understand, and follow Westlake's, Plaquemine Complex, Hazard Communication Program.
- 4.3.2 Understand how to access SDSs in the Westlake's, Plaquemine Complex.
- 4.3.3 Be familiar with hazardous chemicals in the work area by reading the product's SDS.
- 4.3.4 Ensure that proper chemical identity and hazard warning are placed on containers when chemicals are transferred into them.
- 4.3.5 Report unlabeled chemical containers to Department Supervision.
- 4.3.6 Are required to label all portable containers into which hazardous chemicals are transferred from labeled containers.



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- 4.3.7 Will ensure that existing labels on hazardous chemical containers are maintained and not removed or defaced.
- 4.3.8 Will ensure containers routinely used for transporting hazardous chemicals are labeled.

#### 4.4 Contractors:

- 4.4.1 Implement a Hazard Communication Program that meets all requirements of Westlake's, Plaquemine Complex, Hazard Communication Program.
- 4.4.2 Submit a Material Approval form and receive approval for any hazardous chemicals prior to being brought on site.
- 4.4.3 Report unlabeled chemical containers to Department Supervision.

# 4.5 Shipping / Purchasing / Stores:

- 4.5.1 Ensure that each container of hazardous chemicals leaving the workplace is appropriately labeled as described in section 5.5 Container Labeling.
- 4.5.2 Provide chemical industry placards to truck drivers prior to the transportation of chemicals from the Westlake, Plaquemine Complex facility.
- 4.5.3 Container labeling will comply with the requirements of the Hazardous Materials Transportation Act (49 USC 1801) and regulations issued under that act by the Department of Transportation.
- 4.5.4 Labels will meet the requirements of any hazardous chemical regulated by OSHA in a substance-specific health standard (e.g., vinyl chloride).
- 4.5.5 Inadequately labeled incoming containers will be moved to a quarantine area in Stores until the proper label information can be obtained from the manufacturer or H&S Department.

#### 5.0 PROCEDURE

#### 5.1 Hazard Determination

The hazard determination requirement of OSHA's Hazard Communication regulation is performance-oriented. Westlake is not required to follow any specific methods for determining hazards, but must be able to demonstrate that they have adequately ascertained the hazards of the chemicals produced



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or imported in accordance with the criteria set forth in this section. Westlake has two hazard determination procedures:

- 5.1.1 Material Approval Process
- 5.1.2 Product Hazard Determination.

# 5.2 Material Approval Process

- 5.2.1 Material Approval requires the completion of the Westlake Material Approval Process located within Sphera®. This must be completed and approved for each new material before it can be purchased or received by the Plaquemine facility or brought into the plant by contractors.
- 5.2.2 To determine if this form needs to be completed and approved, a Westlake employee needs to examine the list of materials located in Sphera®. If the chemical is not listed within Sphera®, this process must be completed.
- 5.2.3 Anyone who wants a new material brought into the plant must initiate the process by:
  - 5.2.3.1 Obtaining a recent (<3 years old) manufacturer's SDS, in OSHA GHS (Globally Harmonized System) format, for the material(s).
  - 5.2.3.2 Completion of the Material Approval information located within Sphera®.
    - 5.2.3.2.1 Accessing this Material Approval If you search for a material within Sphera® and are not able to locate the material, click on Material Approval located on the left side of the screen beneath "SDS Search". Complete the resulting form, especially those items with red asterisks.
    - 5.2.3.2.2 Sphera® will deliver this Material Approval to the Gatekeeper, and to the following departments for review and approval: Industrial Hygiene, Environmental, Product Stewardship, Utilities and Purchasing. Purchasing should be the last department to receive the form before going back to the Gatekeeper. A chemical cannot be placed in the purchasing system until all required approvals have been attained.



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- 5.2.4 Upon notification from Sphera through e-mail, the appropriate Material Approval Team members will:
  - 5.2.4.1 Assess the hazards and effects of the chemical on their given area, using the SDS along with any other appropriate reference materials.
  - 5.2.4.2 Record the assessment results by completing their portion of the form (if applicable).
  - 5.2.4.3 Approve or Deny the chemical for plant use.
  - 5.2.4.4 After approval by the Material Approval Team, the gatekeeper and the originator are sent e-mails confirming the approval of the material. The gatekeeper then submits a "Service Request" within Sphera to have the material added to the Plaquemine Inventory which allows availability of the new material to all requesters.
  - 5.2.4.5 Members of the Material Approval Team can deny the material access to the facility. The team member would contact the originator explaining the reason for the denial.

# 5.3 Container Labeling

- 5.3.1 Each hazardous chemical container leaving the workplace will be labeled, tagged, or marked with the following information per OSHA GHS requirements:
  - 5.3.1.1 Product Identifier:
  - 5.3.1.2 Signal Word;
  - 5.3.1.3 Hazard Statement(s);
  - 5.3.1.4 Pictogram(s)
  - 5.3.1.5 Precautionary Statement(s); and,
  - 5.3.1.6 Name, address and telephone number of the chemical manufacturer, importer or other responsible party.
- 5.3.2 Each hazardous chemical container in the workplace will be labeled in English, tagged, or marked with the following information:
  - 5.3.2.1 Identity of hazardous chemical(s) contained therein; and
  - 5.3.2.2 Specific physical and/or health hazard warning.
- 5.3.3 Employees shall not remove or deface existing labels on incoming



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containers of hazardous chemicals, unless the container is immediately marked with the required information.

- 5.3.4 Employees are not required to label portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer. If the container is left unattended by the employee or not in his personal possession, it must have a proper label affixed.
- 5.3.5 In-plant container labeling is achieved through use of OSHA GHS, the National Fire Protection Association (NFPA) or Hazardous Material Identification Guide (HMIG) hazard material sign marking system. These labeling systems are presented in Appendix B.
- 5.3.6 In-plant labeling is the responsibility of the Department Manager.
- 5.3.7 Chemical identity labels are given to truck drivers, ship captains and barge captains prior to their transportation of chemicals from the facility.
- 5.3.8 Questions about Westlake's Hazard Communication Program's labeling requirements should be referred to the Westlake Product Stewardship Group.

### 5.4 Safety Data Sheets

- 5.4.1 Safety Data Sheets (SDSs) for Westlake products are prepared by the Product Stewardship Group and are available to Westlake employees on the Company Connect Site and on <a href="www.westlake.com">www.westlake.com</a>. Customers, vendors and others may obtain a copy of an SDS at <a href="www.westlake.com">www.westlake.com</a>.
- 5.4.2 An SDS must be onsite for each hazardous chemical used. The SDSs shall be in English, comply with US GHS requirements and include at least the following section numbers and headings, and associated information under each heading, in the order listed:

Section 1, Identification;

Section 2, Hazard(s) identification;

Section 3, Composition/information on ingredients;

Section 4, First-aid measures:



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Section 5, Fire-fighting measures;

Section 6, Accidental release measures;

Section 7, Handling and storage;

Section 8, Exposure controls/personal protection;

Section 9, Physical and chemical properties;

Section 10, Stability and reactivity;

Section 11, Toxicological information;

Section 12, Ecological information;

Section 13, Disposal considerations;

Section 14, Transport information;

Section 15, Regulatory information; and

Section 16, Other information, including date of preparation or last revision.

Note: OSHA will not be enforcing information requirements in sections 12 through 15, as these areas are not under its jurisdiction.

## 5.5 Availability of Safety Data Sheets

- 5.5.1 SDSs for all chemicals manufactured, stored or used at Westlake are made available to Westlake employees and contractors.
- 5.5.2 All Safety Data Sheets may be found within Sphera® on the intranet. Sphera® is located on the HS&E page within the Connect! site. Safety Data Sheets are also available on the company web site at <a href="https://www.westlake.com">www.westlake.com</a>.
- 5.5.3 A backup digital copy of all SDSs manufactured, stored or used at Westlake are maintained in the Security Department at the Main Gate. This backup is updated on a quarterly basis.



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#### 6.0 TRAINING

- 6.1 The training objectives are conveyed to Westlake employees by the Unit/Area personnel and H&S Department periodically. Supervisor or designees are provided training materials and information by the Health & Safety Department. Training objectives shall include:
  - 6.1.1 Information concerning hazardous chemicals. Supervisors should review the Hazard Communication Program and become familiar with the training, container labeling and SDS requirements described therein. Employees are to be trained on the existence and location of operations in their work area where hazardous chemicals are present.
  - 6.1.2 The location and availability of Westlake's written Hazard Communication Program including the required list of hazardous chemicals and SDSs.
  - 6.1.3 The methods and observations that may be used to detect the presence or release of hazardous chemicals in the work area. Techniques described should include, but not necessarily be limited to the following:
    - 6.1.3.1 Monitoring by stationary vapor monitors or personnel dosimeters.
    - 6.1.3.2 Visual appearance of chemical vapors.
    - 6.1.3.3 Odor of hazardous chemicals upon their release to the work area.
    - 6.1.3.4 Operation of pressure relief devices.
    - 6.1.3.5 Release of chemical liquid to the work area.
  - 6.1.4 The physical and health hazards of chemicals in the work area. SDSs are an acceptable reference although the discussion does not have to be limited to the data sheet.
  - 6.1.5 Measures employees can take to protect against an identified chemical hazard. Techniques described should include, but not necessarily be limited to the following:
    - 6.1.5.1 Appropriate work practices designed to prevent release of hazardous chemicals into the work area.
    - 6.1.5.2 Proper use of escape respirators, negative pressure air



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purifying respirators, supplied air respirators, and selfcontained breathing air equipment as applicable.

- 6.1.5.3 Emergency procedures.
- 6.1.5.4 Evacuation procedures.
- 6.1.5.5 Methods of isolating hazardous chemical releases.
- 6.1.5.6 Hazards of non-routine tasks such as:
  - 6.1.5.6.1 HSP 307 Safe Process Opening Policy Operations and contract employees responsible for disassembling process piping and equipment with the potential for chemical splash or spray, will be informed of the Safe Process Opening policy by personnel in the plant in which they work.
  - 6.1.5.6.2 Chemical sampling operations Operations personnel will be trained in the proper methods and precautions necessary for safe sampling operations by area supervision.
  - 6.1.5.6.3 Other such non-routine operations will be presented by area supervision (or designee) to employees that could be exposed.
- 6.1.5.7 The Westlake Permit system will be used to inform employees of hazards associated with chemicals contained in unmarked pipes.
- 6.1.6 The details of the Hazard Communication Program including an explanation of the container labeling system, SDS and how employees can obtain and use the appropriate hazard information.
- 6.1.7 Aspects of the Plaquemine Facility's Material Approval Process.

#### 7.0 RECORDS

- **7.1** Production Units will maintain employee Hazard Communication training records.
- **7.2** Contractors will maintain their own records and keep them on site for H&S review.



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#### 8.0 PROGRAM REVIEW

- **8.1** H&S will ensure that Westlake's, Plaquemine Complex, Hazard Communication Program is reviewed at least annually. The purpose is to assess compliance, ensure that all employees who should be included are, and to evaluate program effectiveness.
  - 8.1.1 The review will evaluate:
    - 8.1.1.1 The current Hazard Communication Program;
    - 8.1.1.2 Employee training records; and
    - 8.1.1.3 Employee awareness.
- **8.2** Following the review, the Hazard Communication Program will be revised to include any necessary changes.
- **8.3** All employees will be informed of any changes made in the plan.

#### 9.0 REFERENCES

- **9.1** American National Standards Institute (2006). "Hazardous Industrial Chemicals Precautionary Labeling," ANSI Z129.1-2006. New York, NY.
- 9.2 American National Standards Institute (2004). "Hazardous Industrial Chemicals Safety Data Sheets Preparation," ANSI Z400.1-2004. New York, NY.
- **9.3** Occupational Safety and Health Administration (2012). "Hazard Communication," 29 CFR 1910.1200.

#### 10.0 APPENDICES

Appendix A – NFPA, HMIG, and GHS Labeling Information



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# **Revision History**

Rev	Changes	Approved	Date
8	Westlake Branding. The changes involve updates regarding OSHA GHS labelling and SDSs. Also the historical storage of SDSs. PLQ0.EHSSPSM.042817.3344	H. Garner	5/1/2017
12	Review for accuracy. Removal of Axiall references.	H. Garner	7/16/2019
13	Review for accuracy. Replace SiteHawk with Sphera	H. Garner	5/24/2021
15	Review for accuracy. Westlake Branding change. Removal of 5.3 and 5.4 which are now handled by Corporate Product Stewardship (Hazard Determination for Westlake Products and Trade Secrets); Removal of Appendix A – OSHA Health Hazard Definitions as it pertains to Sections 5.3 and 5.4 removed.	H. Garner	2/22/2023

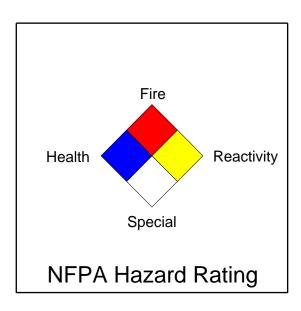
# Appendix A NFPA, HMIG and GHS Labeling Information

#### Fire Hazards (Flash Points)

- 4- Below 73°F
- 3- 73°F to 100°F or Below 73°F and Boils at 100°F
- 2- Above 100°F, Not Exceeding 200°F
- 1- Above 200°F
- 0- Will Not Burn

#### **Health Hazards**

- 4- Deadly
- 3- Extreme Danger
- 2- Hazardous
- 1- Slightly Hazardous
- 0- Normal Material



#### Reactivity

- 4- May Detonate
- 3- Shock and Heat May Detonate
- 2- Violent Chemical Change
- 1- Unstable if Heated
- 0- Stable

#### **Specific Hazard**

Oxidizer- Ox
Acid- Acid
Alkali- ALK
Corrosive- COR
Water Reactive- \(\psi\)

# **HMIG Hazard Warning Label**

#### **Health Hazard**

- 4- **Extreme**: Highly Toxic, May be fatal on short term exposure. Special Protective Equipment required
- 3- Serious: Toxic, Avoid Inhalation or skin contact.
- 2- Moderate: Moderately Toxic, May be harmful if inhaled or absorbed.
- 1- Slight: Slightly Toxic, May cause slight irritation.
- 0- Minimal: All chemicals have some degree of toxicity.

#### Flammability Hazard

- 4- **Extreme**: Extremely flammable gas or liquid, Flash point below 73°F
- 3- **Serious**: Flammable, Flash point 73°F to 100°F
- 2- **Moderate**: Combustible, Requires moderate heating to ignite, Flash point 100°F to 200°F
- 1- **Slight**: Slightly Combustible, Requires strong heating to ignite
- 0- **Minimal**: Will not burn under normal conditions

HEALTH	
FLAMMABILITY	
REACTIVITY	
PERSONAL PROTECTION	

# Reactivity

- 4- **Extreme**: Explosive at room temperature
- 3- **Serious**: May explode if shocked, heated under confinement or mixed

with water

- 2- **Moderate**: Unstable, may react with water
- 1- **Slight**: May react if heated or mixed with water
- 0- **Minimal**: Normally stable, does not react with water

## **Personal Protective Equipment**

- A: Safety eyewear
- B: Safety eyewear, Gloves
- C: Safety eyewear, Gloves, Apron
- D: Eye and face protection, Gloves, Apron
- E: Safety eyewear, Gloves, Dust/mist respirator
- F: Safety eyewear, Gloves, Apron, Dust/mist respirator
- G: Safety eyewear, Gloves, Vapor Respirator
- H: Safety eyewear, Gloves, Apron, Vapor respirator
- I: Safety eyewear, gloves, Dust and vapor respirator
- J: Safety eyewear, Gloves, Apron, Dust and vapor respirator
- K: Supplied air respirator, Gloves, Full suit, Boots
- X: Ask your supervisor for special handling instructions

# **GHS Compliant Label**

#### **OXI252**

(disodiumflammy)





Danger

May cause fire or explosion; strong oxidizer Causes severe skin burns and eye damage

Keep away from heat. Keep away from clothing and other combustible materials. Take any precaution to avoid mixing with combustibles. Wear protective neoprene gloves, safety goggles and face shield with chin guard. Wear fire/flame resistant clothing. Do not breathe dust or mists. Wash arms, hands and face thoroughly after handling. Store locked up. Dispose of contents and container in accordance with local, state and federal regulations.

#### First aid:

IF ON SKIN (or hair) or clothing<sup>6</sup>: Rinse immediately contaminated clothing and skin with plenty of water before removing clothes. Wash contaminated clothing before reuse.

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

IF INHALED: Remove person to fresh air and keep comfortable for breathing.

IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

Immediately call poison center.

Specific Treatment: Treat with doctor-prescribed burn cream.

In case of fire: Use water spray. In case of major fire and large quantities: Evacuate area. Fight fire remotely due to the risk of explosion.

Great Chemical Company, 55 Main Street, Anywhere, CT 064XX

Telephone (888) 777-8888