Authored By: Lea McCleave Doc Custodian:	Blanchard Refining Company LLC Galveston Bay Refinery	Doc No.: RSW-000034-GB Rev No: 0
Safety Supervisor Approved By: Von Meeks	ADM-3 Hazard Communication	Refinery Safe Work Procedure
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1.0 Purpose

This procedure has been developed pursuant to the Corporate OSHA Hazard Communication program (SAF 4014) and is intended to provide information to the employees regarding the chemical hazards associated with their work area(s) which will enable them to take appropriate precautions to eliminate or minimize exposures. This procedure complies with the OSHA Hazard Communication Standard, 29 CFR 1910.1200, as amended in 2012.

2.0 **Scope**

This procedure applies to all work areas where hazardous chemicals/products are used, produced, stored, imported, and/or shipped by MPC employees or contractors.

3.0 Procedure

3.1 Roles and Responsibilities

- 3.1.1 Industrial Hygiene Team Leader
 - 3.1.1.1 Review and update this program at a minimum of every five years and when there are significant changes to the corporate program (SAF 4014) or OSHA standard (29 CFR 1910.1200).
 - 3.1.1.2 Maintain the SDSs stored in MSDSonline to ensure the most recent SDS is available.
 - 3.1.1.3 Maintain a secondary source of all SDSs.
 - 3.1.1.4 Maintain the container list information submitted by each unit/area in MSDSonline.
 - 3.1.1.5 Complete the new chemical/vendor review.
 - 3.1.1.6 Share all new SDSs with Corporate Health Services.
- 3.1.2 Procurement Personnel
 - 3.1.2.1 Ensure that products being purchased for the site have HESS approval and an SDS in MSDSonline.
- 3.1.3 Warehouse/Storehouse Personnel
 - 3.1.3.1 Ensure that products being purchased for the site have HESS approval and an SDS in MSDSonline.
- 3.1.4 Area Team Leaders/Maintenance Supervisors
 - 3.1.4.1 Ensure that all employees in the area/unit are aware of the hazards of new products/chemicals.
 - 3.1.4.2 Ensure that all new employees to the area/unit have completed the required Hazard Communication and MSDSonline web trainings.
 - 3.1.4.3 Verify to the HESS department that the containers list submitted annually is accurate.
 - 3.1.4.4 Ensure that MOCs are completed for chemical or stationary process container changes.
- 3.1.5 Servicing Group Supervisor
 - 3.1.5.1 Ensure that contractors are aware of the hazardous chemicals/products that they may encounter while performing work.
- 3.1.6 Lab Personnel

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- 3.1.6.1 Ensure that laboratory samples use a labeling system that contains the identity of the chemical, hazard warning, HMIS hazards ratings, and personal protective equipment recommended for handling.
- 3.1.6.2 Update and provide pre-printed sample labels to all units.

3.2 Chemical Inventory List

- 3.2.1 A comprehensive list of all Hazardous Chemicals used in the course of MPC activities and located onsite shall be maintained and updated within MSDSonline.
- 3.2.2 Non-bulk hazardous chemicals that are utilized on a temporary basis and are stored onsite for less than 90 days during a calendar year are not required to be added to the chemical inventory list. However, a printed or local copy of the SDS and an inventory list of the chemicals on site must be readily accessible.

3.3 New Chemical/Vendor Review

- 3.3.1 A change in chemical will be reviewed as part of the MOC process.
- 3.3.2 HESS Department will complete the review.
- 3.3.3 Each new chemical that is brought on-site must go through an approval process.
- 3.3.4 When the vendor for a chemical that is already on-site changes, a review must also be completed.
- 3.3.5 The review includes the following elements:
 - Review of applicable regulations associated with the chemical's use
 - Review of the physical and/or health hazards associated with the chemical's use and disposal
 - Training necessary for the chemicals safe use and/or proper disposal
 - Necessary personal protective equipment
 - A review of possible alternatives with a lower hazard profile

3.4 Safety Data Sheets

- 3.4.1 General
 - 3.4.1.1 An appropriate SDS must be readily available to employees for each hazardous material in their work area.
 - 3.4.1.2 All SDSs, including those for chemicals brought on-site by contractors, will be available both electronically in MSDSonline and by recording an electronic copy of all current SDSs offline.
 - 3.4.1.2.1 SDSs for non-bulk chemicals / incidentals being utilized onsite for temporary purposes (less than 90 days in a calendar year) are not required to be uploaded or maintained in MSDSonline.

3.4.2 Purchased/Imported

- 3.4.2.1 All new products brought into the site must include the most recent SDS.
- 3.4.2.2 All purchased/imported chemicals/products must be approved by HESS prior to the chemical/product entering the site. For a new chemical/product, the SDS must be submitted to HESS for approval. It is the requisitioner's responsibility to make sure that the SDS has been approved by HESS before the new product enters the site. HESS Department will notify the requestor of SDS approval in a timely manner. This includes all bulk chemicals to be brought onto the site by contractors.

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- 3.4.2.3 Procurement will ensure that products being purchased for the site have HESS approval and have an SDS in MSDSonline.
- 3.4.2.4 Warehouse/Storehouse will ensure that products being received on site have HESS approval and have an SDS in MSDSonline.
- 3.4.2.5 HESS will share all new SDSs with Corporate Health Services.
- 3.4.3 Site Produced Products/Intermediate Streams/Shipped Products
 - 3.4.3.1 Products produced at the site and intermediate streams will have an SDS. MPC Toxicology and Product Safety will evaluate the hazards and prepare all of the intermediate stream's and product's SDSs for MPC.
 - 3.4.3.2 To develop a new SDS or update an existing SDS, an SDS/Label Request Form should be completed and submitted to MPC Toxicology and Product Safety with a copy to the site industrial hygienist.
 - 3.4.3.3 Prior to, or at the time of shipment, SDSs shall be provided to customers with the initial purchase of any MPC product and with any subsequent purchases after a major SDS revision.

3.4.4 Container Lists

- 3.4.4.1 The container list will be maintained in MSDSonline. If MSDSonline is unavailable a copy of the SDS can be requested from the HESS Industrial Hygiene.
- 3.4.4.2 Each unit/area will provide HESS with their updated container list including a chemical list and process information on an annual basis.
- 3.4.4.3 HESS will update the container list information submitted by unit/area in MSDSonline.

3.5 <u>Labeling</u>

- 3.5.1 Container Labeling Requirements
 - 3.5.1.1 Labels shall be affixed to, printed on, or attached to the container such that all letters, numerals and/or pictogram(s) shall be of sufficient size to be legible and prominently displayed.
 - 3.5.1.2 Container labels must be in good condition and legible. Maintaining the presence, good condition, and legibility of container labels shall be the responsibility of the individual employee or the unit/area supervision who has custody of the container.
 - 3.5.1.3 Laboratory samples use a labeling system that contains the identity of the chemical, hazard warning, HMIS hazards ratings, and personal protective equipment recommended for handling.
 - 3.5.1.4 The laboratory will ensure that pre-printed sample labels are updated and supplied to the units.
 - 3.5.1.5 For special samples, the person collecting the sample is responsible for ensuring that the container is labeled appropriately.
 - 3.5.1.6 In absence of a manufacturer's label, containers storing hazardous chemicals shall be labeled in accordance with the minimum requirements set forth in the table below.

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Container Type	Minimum Label Elements ¹
Stationary Container (Storage Tank)	 Product identifier or synonym (as listed on SDS), Tank Identification Number, if applicable, HMIS or NFPA 704 Diamond, and Chronic Health Hazard information if identified on SDS
	(e.g., statement or pictogram with a black or red border).
	Alternatively, Elements 1-2 specified below for shipped containers.
Portable (Secondary) Container ³	 Product identifier or synonym (as listed on SDS), HMIS or NFPA 704 Diamond, and Chronic Health Hazard information if identified on SDS
	(e.g., statement or pictogram with a black or red border).
	Alternatively, Elements 1-2 specified below for shipped containers.
	<i>Note:</i> RAD shall adhere to their Laboratory Safety Chemical Hygiene Plan (CHP) per 29 CFR 1910.1450.
Stationary Process Container	1. Vessel Identification Number ⁴
Shipped Containers ⁵	 Product identifier or synonym (as listed on SDS), GHS Pictogram(s) with <u>red</u> border as identified in SDS, Signal Word, Hazard Statement(s), Precautionary Statement(s), and Name, Address, and Telephone Number of the chemical manufacturer, importer, or other responsible party.
Distribution System	None Required
Non-Hazardous Waste per RCRA	Does not require generator of waste to develop their own labels. Include available SDSs and labels from upstream sources (if available). Do not remove any labeling if already affixed to container.
Hazardous Waste per RCRA	 Labeled with the words 'Hazardous Waste', and 1. EPA hazardous waste characteristic(s) (ignitable, corrosive, reactive or toxic), or 2. OSHA/DOT pictogram(s), or 3. NFPA 704 Diamond. <i>Note:</i> Per 40 CFR 262.15(a)(5) the effective date of this regulation is May 30, 2017
Rail Car ² &	1. Follow DOT labeling requirements.
Cargo Tank ² (Truck)	2. BOL shall convey means to obtain printable GHS label information.

Note 1- Labeled containers received by the Component for use in the workplace (e.g., totes, drums) do not need to be relabeled unless the original manufacturer's label is removed or defaced.

Note 2 – A cargo tank (truck) or rail car containing a Hazardous Chemical that, incidental to transportation, is onsite waiting to be offloaded or fully loaded for a period of 30 days or more must be labeled in accordance with the minimum label requirements for stationary containers (storage tanks).

Note 3 - Portable (Secondary) containers do NOT need to be labeled if the hazardous chemicals were transferred from a labeled container, and which are intended only for the immediate use of the individual who performs the transfer.

Note 4 – Vessel identification number shall correlate with operations information systems (e.g., OI&S) to identify container contents and corresponding SDS.

Note 5 –The minimum label elements for this container type apply to shipped containers with off-spec products (i.e. expanded range products) provided said products are not shipped as hazardous waste per RCRA (See SDS Creation & Maintenance Standard for additional requirements applicable to off-spec products under unforeseen occurrences).

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3.5.2 Labeling for Shipped Containers

- 3.5.2.1 For shipped hazardous products, a copy of the SDS will be attached to each shipment in a weatherproof envelope or attached to the carrier's copy of the bill of lading.
- 3.5.2.2 For marine shipments, a copy of the appropriate product SDS must be sent with the accompanying shipping papers.
- 3.5.2.3 Individuals that need to send any new products off-site must contact the Department of Transportation (DOT) coordinator for proper shipping instructions.
- 3.5.2.4 All mechanical equipment/parts that have been in hazardous chemical/product service (inhibitor, acid, caustic, sludge toxic, etc.) will be prepared as specified in the applicable unit standard operating instruction. This applies to any equipment/parts which have internal spaces that may contain trapped hazardous materials. Examples are pumps, pumps casing, valves, cartridge seals, and exchangers, etc.
- 3.5.3 Labeling for Shipment of Small Containers
 - 3.5.3.1 For containers too small to display the minimum label information in a printon or stick-on format, pull-outs, fold-backs, or tags may be used. If none of these options are feasible, an abbreviated label can be used on the containers provided a full label is attached to the outer package (e.g., an overpack) in which the container is placed.
 - 3.5.3.2 When using an abbreviated label, the shipped small container (i.e., immediate or actual container holding the hazardous chemical) must at a minimum contain the following:
 - Product identifier;
 - Appropriate pictogram(s);
 - Signal word;
 - Manufacturer's name and phone number;
 - A statement indicating the full label information for the chemical is provided on the outside package.
 - 3.5.3.3 The outside packaging (e.g., an overpack) is the object (e.g., bag, jar, box) into which the immediate product container is placed. The label for the outside packaging, at a minimum, must meet the following:
 - Contain <u>all</u> the previously referenced shipped container label elements;
 - Clearly marked to ensure that the complete label elements are visible, and inform users that the inner small container(s) must be stored in the outer container (package) bearing the complete label;
 - The integrity of complete label must be maintained on the outer package (e.g., not torn, defaced, destroyed)

3.6 <u>Hazardous Material Storage</u>

- 3.6.1 Refer to PR-17 General Safety Rules for hazardous material storage requirements.
- 3.7 <u>Contractors</u>
 - 3.7.1 The MPC Servicing Group Supervisor is responsible for ensuring that contractors are aware of the hazardous chemicals/products that they may encounter while performing work. All contractors must have appropriate training on how to limit exposure to

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workplace hazards as outlined in the MPC Contractor HESS Management System Manual.

- 3.7.2 The Owning Department Representative and the MPC Servicing Group Supervisor will inform the contractor representative of new hazards in their work area during work permit reviews.
- 3.7.3 If contractors are bringing new chemicals/products on-site:
 - The contractor must gain approval
 - The contractor must inform the MPC Servicing Group Supervisor during the job planning process.
 - The MPC Servicing Group Supervisor will inform the Owning Department Representative who will then advise any affected personnel.
 - MOC shall be completed when applicable.
- 3.7.4 Contractors may request, and will be provided with, access to complete SDSs for hazardous materials in their work area.

3.8 <u>Training</u>

- 3.8.1 Scope and Frequency
 - 3.8.1.1 Employees who work or may work in areas where hazardous materials are used, stored, or produced will be provided with information and training regarding the hazards of the chemicals/products with which they work before being released to work independently. Refresher training will be provided to each employee at a frequency determined by the Learning and Development (L&D) Department.
 - 3.8.1.2 All new employees will complete the Hazard Communication and MSDSonline web trainings prior to being released to work independently. Refresher training frequency training will be determined by the L&D Department.
 - 3.8.1.3 Area Team Leaders/Maintenance Supervisors will ensure that all new employees to the area/unit have completed the required Hazard Communication and MSDSonline web trainings.
 - 3.8.1.4 The L&D department will develop the training program.
 - 3.8.1.5 Training and information will be provided to affected employees whenever:
 - A new hazardous material is introduced to the workplace.
 - New hazard information regarding an existing chemical/product
 - Handling procedures have been revised
 - 3.8.1.6 Area Team Leaders/Maintenance Supervisors will ensure that all employees in the area/unit are aware of the hazards of new products/chemicals.
- 3.8.2 Information to be provided in the Training
 - 3.8.2.1 Requirements of the OSHA Hazard Communication standard.
 - 3.8.2.2 Identification of processes in or near the work area that contain hazardous chemicals/products.
 - 3.8.2.3 Location and availability of this HESS Procedure, ADM-3 Hazard Communication (HAZCOM), MSDSonline, and the electronic backup of SDS including how to access and use these materials.
 - 3.8.2.4 The details of the developed hazard communication program, including an

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explanation of the in-plant labeling system, SDS, and how the employee can obtain and use the hazard information.

- 3.8.2.5 The health and physical hazards of the materials in the work area.
- 3.8.2.6 The methods and observations used to detect the presence or release of the hazardous materials in the work area.
- 3.8.2.7 The measures employees should take to protect themselves from the hazards.
- 3.8.3 Hazards of Non-Routine Tasks
 - 3.8.3.1 Employees shall be informed of the hazards of non-routine tasks by various methods.
 - Work permit review
 - Group safety meetings
 - Tool Box Talks
 - 3.8.3.2 Determine the contents of stationary tanks/vessels, unlabeled pipes, and/or portable containers. Afterwards, reference the appropriate SDS and understand the hazards.
 - 3.8.3.3 Inquire from the equipment's owner on the chemicals involved in the work activity and reference the appropriate SDS.

3.9 <u>Audit</u>

3.9.1 Audit of hazard communication program will be conducted annually by each unit using an audit checklist and action items entered into Intelex by the unit.

3.10 Recordkeeping

3.10.1 Training records for MPC employees will be maintained by the L&D department.

4.0 **Definitions**

- 4.1 *Hazard Communication (HAZCOM):* Providing information about hazardous materials to the employees that may come into contact with the materials in the workplace.
- 4.2 *Hazardous Material Identification Systems (HMIS) Labels:* Container label with the hazard categories and hazard rating.
- 4.3 <u>Hazard Warning</u>: Written or printed warning placed on containers which identify the specific health and/or physical hazards of the material.
- 4.4 **<u>MSDSonline</u>**: An SDS database for all the chemicals/products produced, used, or stored within the Galveston Bay Refinery. The database also contains chemical list and container list information.
- 4.5 *National Fire Protection Association (NFPA) Labels:* Container label with the hazard categories and hazard ratings.
- 4.6 **<u>Pictogram</u>**: A picture conveying health, physical, and/or environmental hazard information about a chemical. Each pictogram consists of a different symbol on a white background within a black or red square frame set on a point (i.e. a black or red diamond).
- 4.7 **Portable (Secondary) Container:** A smaller container utilized to transfer hazardous chemical(s) from the original labeled container. These are often portable or known as "working containers". Examples include pails, buckets, beakers, sample containers, flasks, and bottles.
- 4.8 *Product Identifier:* Name, number or synonym used for a hazardous chemical on a label or in the

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SDS. Provides a unique means to which users can identify the chemical. Shall permit cross-references with the corresponding Label and SDS.

- 4.9 <u>SDS (Safety Data Sheet)</u>: Document that contains a material's hazard information, emergency response information, physical and chemical properties, toxicological information, firefighting information, etc.
- 4.10 **Shipped Container:** Any container leaving the workplace through normal shipping routes or physically handed to another person (including lab courier services.)
- 4.11 **Signal words:** A single 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 are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for less severe hazards.
- 4.12 <u>Stationary Container:</u> A container used for holding hazardous chemicals (even if connected to a distribution system). Examples include swing tanks, crude oil tanks, crude condensate tanks, and other product storage tanks.
- 4.13 <u>Stationary Process Container:</u> A container that is not mobile, in which a process other than storage takes place, or a stationary container which contains a liquid (other than waste) used for dipping and coating. Examples include knockout drums, frac tanks, treatment, separator, and reactor vessels.

5.0 References

- 5.1 OSHA 29 CFR 1910.1200 "Hazard Communication"
- 5.2 OSHA's Guide to "The Globally Harmonized System of Classification and Labeling of Chemicals (GHS)"
- 5.3 Texas Hazard Communication Act
- 5.4 MPC Corporate SAF-4014 Hazard Communication Program

6.0 Attachments

- 6.1 Attachment A HMIS Label
- 6.2 Attachment B NFPA Label
- 6.3 Attachment C HAZCOM Pictograms
- 6.4 Attachment D Chemical Inventory Update Form

7.0 Revision History

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue. Consolidated site procedure replaces GBR-HESS-ADM-03 and RSW- 0007-TC and updated per Corporate SAF- 4014 under MOC 58331.	L. E. McCleave	V. J. Meeks	3/6/2019	4/1/2019

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Attachment A – HMIS Label

Hazardous Materials Identification Systems (HMIS) label is a label with the hazard categories and hazard ratings. The following are the categories: blue – health, red – flammability, yellow – reactivity, and white – Personal Protective Equipment (PPE) index. The hazard ratings for flammability, health, and reactivity range from 0 - 4 where 0 is minimal hazard and 4 is severe hazard. The PPE rating (A-K and X) gives a guideline of recommended PPE to use while handling the hazardous material.



LABEL MADE IN REDWOND, OFFICIAL U.S.A.

THE DE LEON & CORPORATION RTK 402

PPE Rating	Personal Protective Equipment
A	Safety glasses
В	Safety glasses and gloves
С	Safety glasses, gloves, and apron
D	Face shield and eye protection, gloves, and apron
Е	Safety glasses, gloves, and dust mask
F	Safety glasses, gloves, apron and dust mas
G	Safety glasses and a vapor respirator
Н	Goggles, gloves, apron, and a vapor respirator
I	Safety glasses, gloves, particulate and vapor respirator
J	Goggles, gloves, apron, particulate and vapor respirator
К	Airline hood or mask, gloves, full suit and boots
Х	Contact your supervisor or standard operating procedure for special handling instructions.

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Attachment B – NFPA Label

The National Fire Protection Association (NFPA) has developed a color coded, numerical system for indicating the health, flammability and reactivity hazards of chemicals. In addition, a special precaution symbol may be used if necessary.

The categories are: blue – health, red – flammability, yellow – reactivity, and white – special precaution. The hazard ratings for flammability, health, and reactivity range from 0 - 4 where 0 is minimal hazard and 4 is severe hazard. The special precaution (if any) will indicate whether the material is water reactive (W) or oxidizing agent (Ox)



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Attachment C – HAZCOM Pictograms

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.





- Flammables
- Pyrophorics
- Self-Heating
- Emits Flammable Gas
- Self-Reactives
- Organic Peroxides



Corrosion

- Skin Corrosion/Burns
- Corrosive to Metals



Environment (non-mandatory) Aquatic Toxicity





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Attachment D – Chemical Inventory Update Form

pi	emical Inventory Update Form	
Material Name:		
Marathon Safety Data Sheet (SDS) Number If this is a new chemical to MPC (i.e., no S	ar: [] DS Number is available), attach a copy of the SDS to this document.	
Intended Use/Storage Location: List the Unit/Area and Vessel/Equipment w	here the material is used and/or stored as well as how the material will	be used
Container Status: No Cha	ange Decommission Return to Service Out of Service Capacity Change	
MOC Number (if applicable):		
Maximum Inventory Onsite (lbs, gal, or bb)	s):	
Average Inventory Onsite (lbs, gal, or bbls	κ	
Frequency (one-time, quarterly, monthly, d	aily):	
Date Material First Arrived Onsite:		
Last Date Material is Used/Stored Onsite:		
Deep this chemical replace as evicting also		
If "yes", provide name of chemical to b	e replaced:	
w Product Information		
Is Material a Catalyst? 🛛 🔲 Yes	No No	
Is Material a Chemical? 🛛 🔲 Yes	🔲 No	
Is the catalyst or chemical a 🛛 🔲 Solid	Liquid Gas	
D Pure	Compound Mixture	
rage Container Type (Select one) Check All that Apply		
Above Ground Tank (A)	Carboy (G) Glass Bottles or Jugs (M)	
Below Ground Tank (B)	Silo (H)	
Tank Inside Building (C)	Fiber Drum (I)	
Steel Drum (D)	Bag (J) Tank Wagon (P)	
Plastic or Non-Metallic Drum (E)	Box (K) 🔲 Rail Car (Q)	
🔲 Can (F)	Cylinder (L)	
orage Conditions (Select two: Pressure & Check All that Apply	Temperature)	
Ambient Precoure (4)	Ambient Temperature (4)	
Ambient Pressure (1)	Greater man Amplent Temperature (5)	
Ambient Pressure (1) Greater Than Ambient Pressure (2) Less Than Ambient Pressure (2)	Less Than Ambient Temperature, but Net Causessie (6)	
Ambient Pressure (1) Greater Than Ambient Pressure (2 Less Than Ambient Pressure (3)	Less Than Ambient Temperature, but Not Cryogenic (6)

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