Hazard Communication (HAZCOM)

1. Purpose

USPL has established a Hazard Communication Program to classify the hazardous chemicals and materials in the workplace and communicate these hazards to employees and contractors. Employees and contractors must know the hazardous properties of chemicals and materials to be safe during the use, handling, or accidental contact with the chemical or material. Chemical inventory lists, safety data sheets (SDSs), labeling, and training are all used to educate employees and contractors of the hazards associated with chemicals in the workplace.

2. Scope

This policy applies to all BP USPL employees and contractors. The HAZCOM program does not apply to non-hazardous chemicals or materials or products subject to the Consumer Product Safety Act (i.e. a consumer product).

3. Minimum Requirements

	Minimum Requirements	Supporting Documentation
1.	Employees shall know their roles and responsibilities concerning the safe use, storage, and handling of hazardous chemicals and materials.	Sections 5
2.	Any hazardous chemical or material used in the workplace shall: • Be stored in a properly labeled container. • Have an SDS available upon request. • Be listed on the Chemical Inventory List and kept on file.	Section 6
3.	Before procuring or introducing a new chemical into the workplace (one that is not on the current Chemical Inventory List), the new chemical shall be assessed using the Management of Change (MOC) process.	Section 6 Appendix III
4.	All containers shall be labeled with the product identity and hazard warning.	Section 7
5.	HAZCOM training shall be provided initially and whenever new chemicals are introduced into the workplace.	Section 8
6.	BP and contractors shall inform workers of what hazardous chemicals are present in the workplace and how to access SDSs.	Section 9

4. Definitions

Bill of lading—A document issued by a carrier acknowledging that specified goods have been received on board as cargo for conveyance to a named place for delivery to the consignee.

Carcinogen—A cancer-causing agent.

Chemical Inventory List—A list of all current hazardous chemicals used in the workplace for each Region/facility.

Chemical name—The scientific designation or a name that clearly identifies the chemical for the purpose of conducting a hazard evaluation.

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.

Container—Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, or storage tank that contains a hazardous chemical. For purposes of this policy, pipes or piping systems, engines, fuel tanks, or other operating systems in a vehicle are not defined as containers.

Consumer product—A product or material that is available at local retail stores in containers and quantities meant for normal consumer use as intended by the manufacturer and that is used in a duration and frequency of exposure that could reasonably be experienced by consumers for the intended purpose.

Corrosive—A chemical that causes visible destruction or irreversible damage to skin or eyes.

Explosive—-A chemical that causes a sudden, instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

Exposure or exposed—-Being subjected to (in the course of employment) a chemical that is a physical or health hazard. “Subjected to” or exposure can include any route of entry (e.g., inhalation, ingestion, skin contact, or absorption).

Flash point—The minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when tested by industry-accepted methods.

Hazard category—The division of criteria within each hazard class, e.g., oral acute toxicity and flammable liquids include four hazard categories.

Hazard class—The nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.

Hazard not otherwise classified (HNOC)—An adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes.

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.

Hazardous chemical—Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Health hazard—A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Immediate use—For purposes of this policy, a term meaning that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Irritant—A chemical causing a reversible inflammatory effect on the skin or eyes by chemical action at the site of contact.

Label—An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.

Label elements—The specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.

Mixture—A combination or a solution composed of two or more substances in which they do not react.

New chemical—For the purposes of this policy, a hazardous chemical that does not appear on the approved Chemical Inventory List.

Oxidizer—A chemical that initiates or promotes combustion in other materials, thereby causing fire, either of itself or through the release of oxygen or other gases.

Physical hazard—A chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

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.

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.

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.

Pyrophoric gas—A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.

Reactive—*See* Unstable.

Safety data sheet (SDS)—A document providing Information about a hazardous chemical that is written or printed and prepared in accordance with the OSHA Hazard Communication standard.

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.

Simple asphyxiant—A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.

Sensitizer—A chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure to the chemical.

Skin corrosion—The production of irreversible damage to the skin following the application of a test substance for up to 4 hours.

Substance—Chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

Toxic—The inherent capability of a substance to cause health effects and illness.

Unstable (reactive)—A chemical that, in the pure state or as produced or transported, will vigorously polymerize, decompose, or condense, or will become self-reactive under conditions of shock, pressure, or temperature.

Water-reactive—A chemical that reacts with water to release a gas that is either flammable or toxic.

5. Roles and Responsibilities

5.1. Safety Team

A. Provide oversight and support of the HAZCOM program.

B. Conduct a periodic review of the program to ensure effectiveness and develop employee training materials.

C. Participate in the MOC process for new chemicals.

5.2. Team Leaders

A. Notify employees whenever a new hazardous chemical is introduced into the workplace or whenever employees will be using new chemicals.

B. Advise employees of any associated hazards by providing training on the contents of the SDS for the chemical.

C. Accountable to maintain the Chemical Inventory List and the SDSs. (See Section 6 for a complete list of responsibilities for maintaining the list of hazardous chemicals and the SDSs.)

D. Initiate an MOC process for all new hazardous materials to be used in the workplace.

E. Annually review the Chemical Inventory List to keep the list current.

F. Add any new hazardous chemicals or materials to the Chemical Inventory List and remove obsolete materials no longer in use. Hard copies of obsolete SDSs shall be sent to the Region office of records to be kept on file for 30 years.

5.3. Employees

A. Read and understand the SDS for each hazardous chemical or material to which they may be exposed.

B. Report any unlabeled containers of hazardous chemicals or materials to Supervision.

C. Purchase only chemicals on the approved Chemical Inventory List.

D. Notify the Team Leader and help initiate the MOC process prior to introducing a new chemical into the workplace. The review shall include Safety and Environmental Coordinators.

6. Chemical Inventory List, SDSs, and Hazard Communication Requirements

6.1. Chemical Inventory List

A. The Chemical Inventory List shall include the following:

1. Product or chemical name of all hazardous materials present in the workplace
2. SDS revision date

3. Manufacturer of the hazardous material

B. An annual review of the list shall be performed to ensure that the Chemical Inventory List is current. The list shall include hazardous chemicals and materials transported through the pipeline, stored at stations, as well as those purchased.

C. A Management of Change shall be initiated prior to the purchase of a hazardous chemical or material that is not listed on the Chemical Inventory List to evaluate and manage potential exposures from unfamiliar chemicals or materials.

1. The MOC shall include a review by both Safety and Environmental Coordinators.

D. Hazardous materials that are no longer approved for use in USPL facilities shall be declared "obsolete" and removed from the Chemical Inventory List and the SDS archived.

6.2. SDSs for Hazardous Materials

A. Every hazardous chemical and material in the workplace, with the exception of those excluded as a "consumer product," shall have a current SDS available.

B. SDSs for hazardous chemicals in the workplace shall be readily accessible (within the work shift) by all personnel upon request.

1. Electronic access and other alternatives to maintaining paper copies of the SDSs are permitted as long as they do not create barriers to employee access. (3E link: 3E SDS webpage . 3E phone number to request SDS information 1 (800) 451-8346)

C. Hazardous chemicals or materials that are no longer in use shall be declared "obsolete" and their SDSs archived by sending them to the DRM Technical Specialist or to electronic file archives.

1. The Global Product Stewardship Group will archive all obsolete BP finished product SDSs.

2. All obsolete paper SDSs shall be retained for 30 years.

6.3. Hazard Communication

A. SDSs, shall be available to personnel at the time of initial assignment and whenever a new hazard is introduced.

B. SDSs shall be available to personnel involved in emergency response activities.

C. Identification and mitigation of possible chemical hazards pertaining to each job shall be part of the Authorization to Work (ATW) pre-job hazard assessment.

7. Labels and Other Forms of Warning

7.1. General Requirements

A. Containers of purchased hazardous chemicals or materials shall have the proper labeling affixed by the supplier. These labels shall not be removed or altered and shall be consistent with the corresponding SDS information.

B. Chemical manufacturers, importers, and distributors shall label, tag, or mark each container of hazardous chemical materials leaving the workplace with the following information:

1. Product identifier

2. Signal word

3. Hazard statement(s)

4. Pictograms(s)

5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

C. If the chemical is also regulated by an OSHA substance-specific standard (e.g., benzene, lead, asbestos, etc.), the operating unit shall ensure that the hazard warning meets the requirements of that standard as well. In addition, the hazard warning shall be consistent with the SDS information.

7.2. Labeling Requirements for Specific Types of Containers

A. Tanks (storage, additive, VRU, etc.)

1. Label or stencil the following information on the side of the tank near the tank valves:
   a) Product identification and the appropriate hazard warning (NFPA codes, benzene cancer hazard warnings, etc.); or
   b) An identifier (e.g., Tank No., Batch No., etc.) that is cross-referenced to the SDS (see Appendix I as an example. Appendix II is a blank form.).

B. Load racks

1. Use API color code or labels on loading arms and meters.
2. Use API color code to mark vapor recovery lines.

C. Vehicles transporting bulk hazardous materials

1. A BP bill of lading (a DOT-approved document containing hazard warning information) shall be carried in the cab of all vehicles.

D. Piping

1. Although labeling is not required for pipelines, manifold piping, and other station piping, employees who perform non-routine tasks, such as maintenance and emergency operations, shall be informed of the hazards associated with chemicals contained in the pipes in their work areas.

E. Incoming bulk materials received directly from railcars, pipelines, barges, or ships shall be transferred into receiving vessels that are properly labeled, identified, and referenced to hazard warnings.

F. All portable containers shall be labeled with the product identity and a hazard warning.

Exceptions: Precautionary labels are not required on portable containers into which hazardous chemicals are transferred from labeled containers if *all of the following conditions* are met:

1. The contents are for the immediate use (i.e., during the employee's work shift) of the person filling the container.
2. The container remains under the control of the person filling the container.
3. The container is used only within the work shift during which it was originally filled.

G. The following materials are exempted from the requirements of the OSHA Hazard Communication standard but may require labeling specific to other regulations.

- Hazardous wastes
- Pesticides
- Manufactured articles
- Wood products

- Pharmaceuticals

H. U.S. Department of Transportation (DOT) Hazardous Material markings, placards, and labels shall be preserved and retained.

1. Any package, container, or transport vehicle containing a hazardous material shall be labeled, marked, or tagged with a placard in accordance with U.S. DOT Hazardous Material regulations.
2. Employees shall retain those labels or placards until the hazardous material is removed and cleaned to prevent any potential hazards.

   Exception: For non-bulk packages that will not be re-shipped, employees may remove the DOT markings as long as an acceptable marking is affixed that meets the HAZCOM requirements.

8. Employee Information and Training

A. HAZCOM training shall be provided for employees who may encounter hazardous chemicals in the course of their routine duties or emergency response activities.

B. Training shall be provided at the time of initial assignment, whenever a new chemical hazard is introduced into the workplace.

C. Employee information and training programs shall include the following:

1. Overview of the written USPL Hazard Communication Program (this policy)
2. Specific work areas and operations where employees may encounter hazardous chemicals
3. Location of SDSs and the Chemical Inventory List
4. Methods of hazard recognition
5. Hazards associated with chemicals used
6. Proper handling and protective measures, including emergency procedures and personal protective equipment
7. Non-routine tasks/operations
8. Hazards associated with chemical materials in unlabeled pipelines

9. Contractor Notification

A. BP shall notify contractors of all hazardous chemicals and products that may be encountered at the BP facility during the assigned work. Contractors shall be informed of the location and/or how to access the SDSs.

B. Contractors shall notify BP of all hazardous chemicals that they bring into any BP facility and to which they may expose BP employees.

10. Recordkeeping

A. Supervisors shall ensure that obsolete SDSs are archived and kept for 30 years. Hardcopy obsolete SDSs are to be sent to DRM Technical Specialist. Electronic SDS files are to be archived electronically for 50 years.

B. Chemical inventory lists shall be maintained current for the area.

11. References

1. BP Affiliated North American Companies Records Retention Schedule, 10/25/2018.
2. National Fire Protection Association, NFPA 704, Identification of the Fire Hazards of Materials.
3. U.S. Department of Transportation, 49 CFR Parts 171–180.
4. OSHA, U.S. Department of Labor, 29 CFR 1910.1200, Hazard Communication Standard 2012.

Appendix I
Example of Alternative Stationary Container Labeling

Included in this section is a list of the chemicals used or handled at the Example facility.

Name of Compound as it appears on SDS	Manufacturer on SDS	SDS Sheet No.	Location or Vessel No.	Quantity Stored	Benzene* >0.1%	NFPA Code**		
						H	F	R
BP Regular Unleaded Gasoline	BP	1050	Tks 14/15/16	449,000 gals	x	1	3	0
Con-Lux Epolon Rust Inhibitor 20 White	Con-Lux, Inc.	N/A	Warehouse	15 gals		1	3	0

*__Note__: Danger, Contains Benzene, Cancer Hazard. (Refer to the SDS to identify substances that contain greater than 0.1% benzene.)

****NFPA Code**

H = Health	F = Fire–Flash Point	R = Reactivity
4 = Deadly	4 = < 73°F	4 = May detonate
3 = Extreme Danger	3 = < 100°F	3 = Shock- and heat-sensitive
2 = Hazardous	2 = > 100°F, < 200°F	2 = Violent chemical change
1 = Slight Hazard	1 = > 200°F	1 = Unstable if heated
0 = Minimal Hazard	0 = Will not burn	0 = Stable

Appendix II
Sample Chemical Inventory List Form

The following is a sample of a Chemical Inventory List. This list can be used as a tool to cross-reference the materials in bulk storage to SDSs. This example is for reference only. For a downloadable version of the form, go to the Hazard Communication folder under HSSE Policies in DRM.

Name of Material as it appears on SDS (Required)	Manufacturer on SDS (Required)	SDS Sheet No.	Location or Vessel No. (Required)	SDS Revision Date (Required)	Benzene* >0.1%	NFPA Code**		
						H	F	R

***Note**: *Danger, Contains Benzene, Cancer Hazard.

**** NFPA Codes:**

H = Health	F = Fire–Flash Point	R = Reactivity
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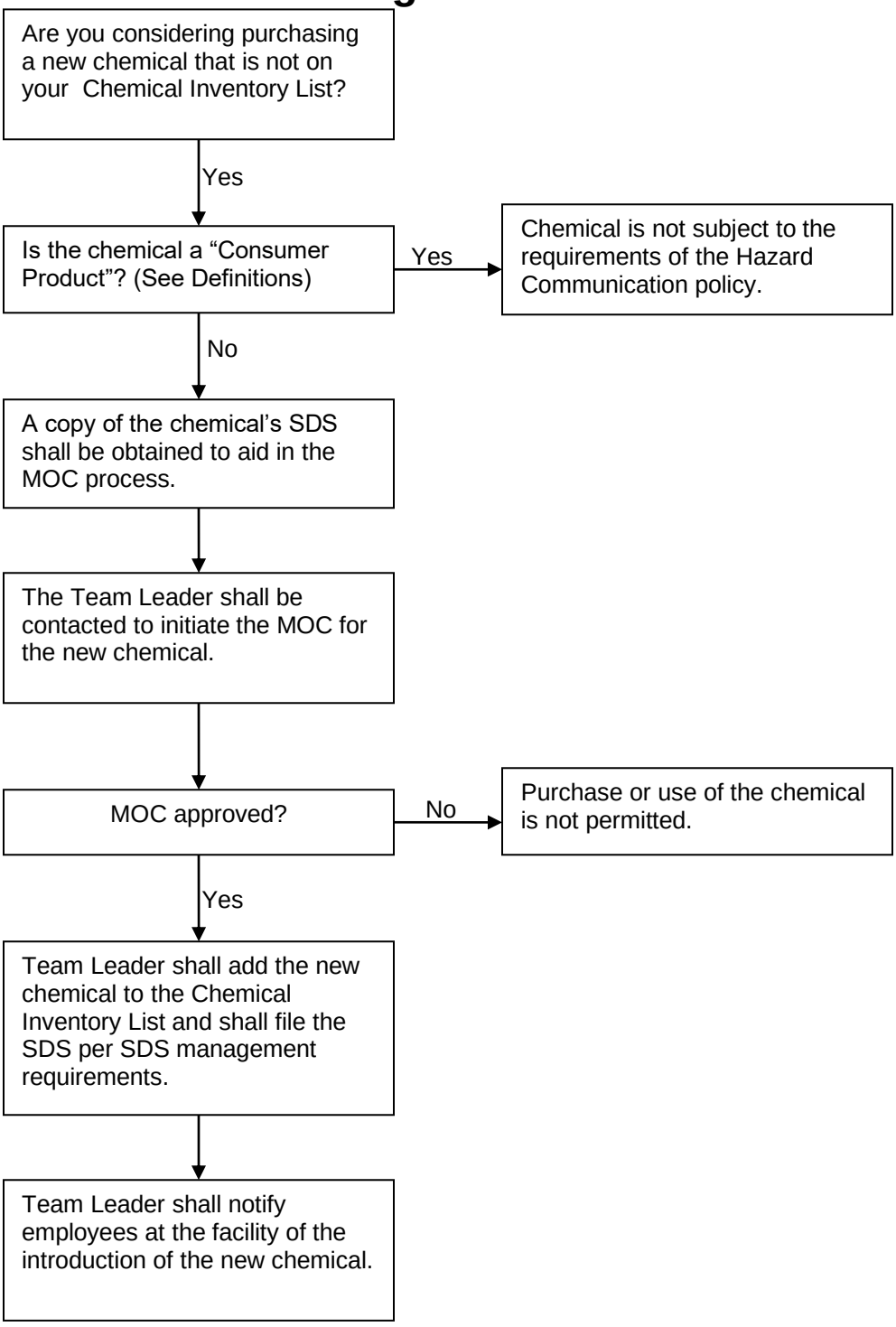
Appendix III
Checklist for Procuring New Chemicals



Appendix IV
Pictograms and Hazards

Health Hazard	**Flame**	**Exclamation Mark**
		
• Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	• Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	• Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
Gas Cylinder	**Corrosion**	**Exploding Bomb**
		
• Gases under Pressure	• Skin Corrosion/ burns • Eye Damage • Corrosive to Metals	• Explosives • Self-Reactives • Organic Peroxides
Flame over Circle	**Environment (Non Mandatory)**	**Skull and Crossbones**
		
• Oxidizers	• Aquatic Toxicity	• Acute Toxicity (fatal or toxic)