



Manitoba Operations



STANDARD PROCEDURE INSTRUCTION

Title		SPI
The Workplace Hazardous Materials Information System (WHMIS) Program		# 36-8
Department	Supersedes SPI Dated	Effective Date
Environmental, Health and Safety	March 20, 1986	Nov. 1998

1. PURPOSE

- 1.1 To prevent potential hazards to employee health and safety, company property and equipment, and the environment by developing procedures and programs to facilitate the safe use and handling of controlled products which are purchased, produced or emitted in the workplace.
- 1.2 To meet or exceed all regulatory requirements related to controlled products in the workplace as set forth in the Manitoba Workplace Safety and Health Act (W210) and Regulations 52/88 and 53/88 as well as related federal legislation under the Hazardous Products Act.

2. SCOPE

- 2.1 Develop procedures and programs to facilitate the safe use of materials purchased or used in the workplace which may be potentially hazardous to employee health and safety, company property and equipment, or the environment. Obtain current Material Safety Data Sheets (MSDS's) from the manufacturer or supplier. Information obtained will include general information on the chemical and physical properties of the material as well as information on normal procedures (storage, handling, use, disposal), hazard ratings (health, fire and explosion, combustion products, reactivity) and emergency procedures (leak or spill, fire, first aid).
- 2.2 Develop procedures and programs to facilitate the safe use of produced or emitted materials in the workplace which may be potentially hazardous to employee health and safety, company property and equipment, or the environment. Produce and keep current MSDS's on materials as required. Information obtained will include general information on the chemical and physical properties of the material as well as information on normal procedures (storage, handling, use, disposal), hazard ratings (health, fire and explosion, combustion products, reactivity) and emergency procedures (leak or spill, fire, first aid).

- 2.3 Establish an inventory of all controlled products in the workplace including information on where the product is used and the quantity of material that may be on the plant site.
- 2.4 Ensure labeling requirements, as outlined in the legislation, are met for ALL controlled products.
- 2.5 Ensure that MSDS information is accessible and available to all employees in the workplace. Computer access or hard copies may be used as deemed necessary by the department Safety, Health and Environment committees.
- 2.6 Develop an educational program to ensure that all employees are aware of the potential health hazards associated with controlled products and the correct procedures for the safe handling, use and disposal of controlled products in the workplace according to WHMIS legislation. Training will also review how to access MSDS information.

3. DEFINITION OF A HAZARDOUS MATERIAL

- 3.1 A hazardous material is broadly defined as any substance which may cause damage or injury to personnel, equipment, or the environment.
- 3.2 A controlled product is any product, material or substance, including mixtures, which, by application of criteria in Part IV of the Controlled Products Regulations, is included in any of the following six classes:

A. Compressed Gas

B. Flammable and Combustible Material

Division 1 Flammable Gases

Division 2 Flammable Liquids

Division 3 Combustible Liquids

Division 4 Flammable Solids

Division 5 Flammable Aerosols

Division 6 Reactive Flammable Materials

C. Oxidizing Material

D. Poisonous and Infectious Material

Division 1 Material Causing Immediate and Serious Toxic Effects

Division 2 Materials Causing Other Toxic Effects

Division 3 Biohazardous Infectious Material

E. Corrosive Material

F. Dangerously Reactive Material

4. PROCEDURES

- 4.1 Purchased Products

The following procedure must be carried out for materials not previously purchased or used within a department including all tests materials.

- 4.1.1 The user will check the on-line hazardous materials register and department inventory files for information on the controlled product.
- 4.1.2 If the material is listed in both files and an MSDS is available on the system, the user may issue a requisition for purchase or, if the item is available from local suppliers with 3-part accounts, the user may issue a 3-part material release in order to obtain the required item.
- 4.1.3 If the material is not listed, the user department will contact Environmental Control to identify the status of the material. If the material has not been reviewed by the WHMIS Program, a purchase requisition will be issued to Purchasing. A Hazardous Material Product Information Sheet will also be completed and sent to purchasing for evaluation and inclusion in the database if required.

Purchasing will obtain a Material Safety Data Sheet from the supplier.

- 4.1.4 Purchasing will forward the completed Product information sheet and MSDS to Environmental Control referenced with the purchase requisition number.
 - 4.1.5 Environmental Control will evaluate the information and will return a copy of the completed Product Information Sheet to Purchasing with their decision. A copy of the MSDS and product information sheet will also be distributed to the requisitioner's departmental Safety and Health Committee co-chairpersons.
 - 4.1.6 When a material has been found to be unsuitable for purchase, the Product Information Sheet will stipulate the reasons for the decision.
 - 4.1.7 Samples being carried onto VALE Limited's property are subject to the same evaluation by Environmental Control as outlined in sections 4.1.1 to 4.1.6 including the purchase order requirement, and must be accompanied by a letter from the supplier stating that the sample may be returned via collect freight to the supplier for disposal should the product prove to be unsatisfactory.
- 4.2 Produced or Emitted Products
- 4.2.1 MSDS's will be written and kept current for all produced or emitted products, including wastes, which have been identified in the plant inventories and meet the classification criteria of a controlled product.
- 4.3 Inventories
- 4.3.1 On an annual basis, controlled products inventories will be conducted in each plant as arranged by the Safety, Health and Environment committee for each individual area.

4.3.2 The information will be written and will include information on the specific workplace, product identifiers, location of MSDS's, the maximum quantity likely to be present at any one time, the date of completion of the inventory and the names of the persons completing the inventory.

4.3.3 The inventory will be posted in each plant and presented to the Safety, Health and Environment committee.

4.4 Labeling

4.4.1 Warehouse personnel are to ensure that all containers received at the warehouse have appropriate labels.

4.4.2 If a label becomes illegible or is accidentally removed, the label will be replaced with a workplace label.

4.4.3 If controlled products are received in a multi-container shipment where individual containers are not labeled, labels shall be obtained by the receiver and applied by the end user. If the product is for immediate use at the site of the shipment, placarding is acceptable.

4.4.4 Labels shall also be produced for all controlled products produced in the workplace.

4.4.5 Users shall ensure that all decanted products meet regulatory labeling requirements.

4.4.6 Any mode of color coding, labels, placards or any other means of identification combined with worker education can be used for controlled products in

- a) pipes
- b) piping systems
- c) process vessels
- d) reaction vessels
- e) tank car/truck, ore car, conveyor, belt or similar conveyance

Color coding for piping systems shall comply with the VALE Engineering Standard 3502-1.1.130.

4.5 MSDS Access

4.5.1 MSDS's will be made readily available at the workplace to the workers.

4.5.2 MSDS's will also be made readily available to the S, H & E committees.

4.5.3 MSDS's may be made available through the use of a computer terminal or hard copies.

4.5.4 Employees must be trained on the method of accessing the MSDS's.

4.6 Training

4.6.1 An annual review of the WHMIS program will be provided to all employees.

4.6.2 Information in the training modules will be updated to reflect changes. Modules will be department specific.

4.6.3 The review will address the following topics:

- a) Labels
- b) Material Safety Data Sheets (MSDS)
- c) Accessing the MSDS's
- d) Fugitive Emissions and Hazardous Wastes

4.6.4 The review training will be instructed by a qualified WHMIS trainer.

4.6.5 New employees will be given the complete WHMIS training session as soon as possible, preferably with their orientation training.

4.6.6 Training records will be kept to ensure all employees are receiving the WHMIS reviews.

5. **RESPONSIBILITIES**

- Environment, Health & Safety

The Manager of Environment, Health & Safety or his/her designate shall be responsible for the administration of the WHMIS program. The program will be reviewed annually by the administrator in consultation with the joint safety, health and environment committees.

Environmental Control

- work jointly with the trainers to assemble the modules
- assist the trainers in making the modules area specific
- provide the training to qualify the trainers
- maintain a hard copy inventory of all MSDS's
- write MSDS's on all controlled products which are produced or emitted in VALE processes, including wastes, as identified by the plant inventories.

- review the VALE written MSDS's at a minimum of every three years to maintain current MSDS's
- provide assistance as required to the departments in collecting the appropriate information for the controlled products inventory

Safety

- schedule training and review sessions for each department
- ensure training modules are available for the trainers

- Department Heads

The Manager of each department or his/her designate shall be responsible for the administration and implementation of the WHMIS program in his/her area.

Safety, Health & Environment Committees

- select trainers with preference given to bargaining unit members
- ensure that arrangements are made to have trainers away from their workplaces for the purpose of training
- ensure that training is complete for new hires
- ensure that reviews are completed as scheduled
- ensure training data is entered into the EQUAL program
- arrange for personnel to conduct the annual controlled products inventory to maintain a current listing of all purchase and produced controlled products in the workplace
- audit the WHMIS program on an annual basis to ensure that the program objectives are being met for the department
- ensure that MSDS's are readily available to employees in the workplace

Trainers

- ensure that information is updated in the modules
- ensure that all questions coming up at the training sessions are answered
- work jointly with the safety supervisor to set up the training and review sessions
- ensure all required records are collected from the training sessions
- work jointly with environmental control to make the presentations area specific

- Purchasing

- ensure information is obtained from suppliers for all potentially hazardous materials appearing in the warehouse stock assortment as well as non-stock items obtained on D.C. purchase order requisitions.
- Ensure all incoming Hazardous Material Product Information Sheets are forwarded to Environmental Control for evaluation.
- Ensure all recommendations for storage and handling materials under their control are followed.
- Ensure all containers of hazardous materials in the warehouse are properly labeled.

- Engineering and Technical Services

- ensure contractors follow the SPI.

APPROVED _____ General Manager, Manitoba Operations)

DATE _____