

GILES CHEMICAL ~ PREMIER MAGNESIA

Company Policy

Title: Hazardous Materials Training Number: S16-PL-200-005

Owner: Rick Hall Revision: 0

Effective Date: 8/01/2017 Page: 1 of 3



1.0 Purpose:

The purpose of this program is to describe training requirements and the responsibilities of those employees that may perform hazmat job functions as outlined in the Hazardous Materials Regulations (HMR) 49 CFR Parts 100 - 185.

2.0 Scope:

The training will include general awareness and familiarization, function-specific, safety, security awareness, and in-depth security plan. All employees who handle or ship hazardous material must be instructed in these requirements and be certified by Giles to perform those duties, except during an initial 90-day period, during which the employee must be under the direct supervision of a properly trained and knowledgeable hazmat employee.

3.0 Responsibility:

- The Safety Department is responsible for oversight of the program including conducting/coordinating training.
- Plant Manager will be responsible for maintaining shipping records.
- Lead Operator will be held responsible for strict adherence to these policies and will closely monitor all activities involving hazardous chemicals.
- Material Handler is responsible for loading, unloading and preparing railcar for release to railroad.
- Each employee is responsible for carefully following established work practices and promptly reporting observed or potential problems to supervision or the safety department.

4.0 Safety Considerations:

There is no job as vital or urgent as to justify the risk of employee overexposure to a hazardous chemical. Ask when in doubt. Proceed with a job only after being satisfied that it is safe for you to do so.

Safety is a condition of employment. Employees are not authorized to work in an unsafe manner and are prohibited from harming the environment of the facility or community.

5.0 Materials/Equipment:

Personal Protective Equipment: Safety Goggles, Face Shield, Acid Suit, and Rubber Gloves. Shipping Papers.

Controlled Document



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6.0 Policy:

GENERAL AWARENESS/FAMILIARIZATION:

Hazmat employees are familiar with the requirements of the Hazardous Materials Regulations (HRM) and able to recognize and identify hazardous materials. All hazmat employees are required to have general awareness/familiarization training. This training provides a basic understanding of:

- The Identification of Hazardous Materials
- The Hazard Classification System
- How to Use the Hazardous Materials Table
- Placards
- **Shipping Papers**
- Segregation
- Understanding of the HMR Training Requirements
- Requirements for Incident Reporting
- Security

FUNCTION SPECIFIC:

This training provides hazmat employees a detailed study of the requirements and regulations applicable to the function(s) for the safe and proper unloading and sampling of sulfuric acid from the railcar into the storage tank. Acid Unloading Procedure P12-PR-200-005.

Employees must receive hands on training and complete an Acid Unloading Test (P12-PR-200-F005) with a score of 70% or higher prior to proceeding with any unloading tasks.

SAFETY TRAINING:

All employees who handle or ship hazardous material must be instructed in these requirements and be certified by Giles to perform those duties, except during an initial 90-day period, during which the employee must be under the direct supervision of trained personnel. The training must cover the hazards presented by hazardous materials, safe handling, emergency response information and methods and procedures for accident avoidance.

Employee training topics shall include:



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- Emergency Action Plan
- Fire Prevention Plans
- Portable Fire Extinguishers
- Employee Alarm Systems
- Manufacturing Evacuation Procedure
- Acid Spill Response Plan
- Hazardous Communications Program
- Confined Space Entry Procedure

- Materials Handling and Storage
- Manufacturing Lock out/Tag out (LOTO)
- Environmental Policy
- Chemical Labeling Policy
- Personal Protective Equipment
- Acid Gear Inspection
- Proper Storage and Inspection of Acid Gear

Recurrent Training will be given at yearly intervals to provide an update on regulatory changes and to ensure a hazmat employee's knowledge remains at the required level to safely carry out their responsibilities.

It is the intent of management to protect the safety and health of each employee, our most valuable and valued asset. By following correct procedures, no employee should experience any harmful effects from working with hazardous materials in their workplace.

Training Records will be kept for three years.

SECURITY AWARENESS TRAINING: Each hazmat employee will receive training that provides an awareness of security risks associated with hazardous materials transportation and methods designed to enhance transportation security. This training also includes components covering how to recognize and respond to possible security threats such as unauthorized access to the facility, severe weather and intentional damage.

ENHANCED SECURITY REQUIREMENTS:

Each employee of Giles has a background check prior to employment.

7.0 Reference Documents:

Hazardous Communications Program (S15-PG-200-007) Chemical Labeling Policy (S15-PL-200-004) Emergency Action Plan (S13-PG-200-003) Acid Spill Response Plan – Waynesville (S12-PG-200-005)

8.0 Change Information:

New Document