CHEMICAL MANAGEMENT PROGRAM

1.0 Purpose

The purpose of the Chemical Management Program is to define the process by which all new chemicals are reviewed and approved for use within the Franklin Mill.

2.0 Scope

2.1 This procedure applies to all International Paper employees, contractors, contracted employees, vendors, and visitors.

2.2 This procedure applies to all chemicals brought onto the Franklin mill.

2.3 This procedure does not apply to the following chemicals:

2.3.1 Tobacco or Tobacco Products.

2.3.2 Wood or Wood Products which will not be processed (sawed, cut, or treated (e.g.: treated indicates, for example, salt-treated lumber or creosote coated).

2.3.3 Articles, as defined by this procedure.

2.3.4 Food, which is sold, used, or prepared in a retail establishment and food (including beverages) intended for personal consumption.

2.3.5 Drugs and cosmetics intended for personal consumption or use

2.3.6 Gravel

2.3.7 Sand, except when sand is used in sandblasting applications

2.3.8 Fill Dirt. Note: Contact Environmental Engineering to ensure fill dirt is tested prior to use.

2.4 This procedure applies to complimentary or sample chemicals provided by vendors or manufacturers.

3.0 References

3.1 Occupational Safety & Health Administration's (OSHA) Hazard Communication Standard, 29 CFR 1910.1200.

3.2 Franklin Mill Hazard Communication Program

4.0 Definitions

4.1 **Article** - a finished product other than a fluid or particle which (1) is formed to a specific shape or design during manufacture; (2) has end use function(s) dependent upon its shape or design during end use; and, (3) under normal conditions of use does not release more than very small quantities of a hazardous chemical, and does not pose a physical hazard or health risk to workers. Examples include: reams of paper, adhesive tape, office furniture, finished bags and boxes, wooden pallets, machine belts, felts, and non-coated nuts and bolts.

4.2 **Chemical** - any element, chemical compound or mixture of elements and/or compounds which includes (1) raw materials; (2) finished products; (3) isolated intermediates; (4) samples; (5) by-products; (6) known decomposition products; (7) wastes; (8) trial chemicals; and (9) laboratory chemicals. A chemical can come in the form of a solid, liquid, or gas.

4.3 **Contractor Chemical** - any chemical brought onto International Paper's property and used by non-International Paper employees hired to perform work on the Franklin Mill site.

5.0 Responsibilities

5.1 Loss Prevention

5.1.1 Oversee the administrative functions associated with this procedure.

5.1.2 Update and maintain the MSDS and Chemical Profile files as needed.

5.1.3 Maintain the master list of chemicals which are approved for use at the Franklin Mill.

5.1.4 Indicate department training requirements on the Chemical Profile, so that department management is aware of the training requirements prior to the chemical's introduction into the department.

5.1.5 Reject or limit the use of chemicals such as carcinogens, sensitizers, and highly toxic materials.

5.1.6 Distribute trial chemical reports quarterly to all effected trial requesters.

5.1.7 Perform hazard determinations –including health hazard evaluations, target organ identification, physical hazard assessments, indicating labeling criteria and safety/eyewash requirements and identification of personal protective equipment- on all new chemicals. Provide this information in the Loss Prevention section of Chemical Profile.

5.1.8 Assist the contractor manager or requester, when needed, with the implementation of the control requirements identified through this review process.

5.1.9 Notify the requester of all chemical approval profile and rejections upon completion of the review. Provide copies of approval profile and MSDS to department management, in accordance with this program.

5.1.10 Notify other contractors and subcontractors, through the International Paper contractor manager, of the need to provide information to those affected by a new significant hazard to be used in their area of work.

5.1.11 Perform an audit annually to determine the level of compliance with this program.

5.2 Environmental Engineering

5.2.1 Review all chemicals for environmental impact, specifically for potential problems with hazardous waste disposal, solid waste disposal, container disposal, chemical reporting, effluent treatment system impact, emergency release considerations, and applicability to other current, proposed and/or new regulations. Provide this information in the Environmental Section of the chemical profile.

5.2.2 Determine compliance with FDA regulations when appropriate.

5.2.3 Determine if the chemical is on California's Proposition 65 list.

5.2.4 Ensure that chemicals are properly registered as part of the Toxic Substances Control Act (TSCA).

5.2.5 Complete the Environmental Engineering section of Chemical Profile by detailing the appropriate use and reporting requirements for each chemical. Assist the contractor manager or requester, when needed, with the implementation of the control requirement identified through this review process.

5.2.6 Reject or limit use of chemicals that could pose significant environmental problems.

5.3 Department Management

5.3.1 Ensure that all end users understand and follow the proper health, and safety and environmental procedures outlined in the MSDS and Chemical Profile.

5.3.1 Perform all necessary training on new hazardous chemical group(s) introduced into the department.

5.4 Chemical Requester

5.4.1 Obtain all MSDS and environmental information required by this procedure, and if available, any pertinent product literature or information which may assist in the chemical(s) evaluation.

5.4.2 Complete the request portion of the Chemical Profile for new chemicals.

5.5 Purchasing/Storeroom

5.5.1 Review all purchase orders or storeroom request forms, as they are received, to ensure that the chemical requested is on the mill approved chemical list.

5.5.4 Forward all received MSDS (new or updated) to Loss Prevention.

5.6 Contractor Manager

5.6.1 Obtain legible and up to date Material Safety Data Sheets from the contractor requesting the chemical approval.

5.6.2 Provide Material Safety Data Sheets to contractors using chemicals provided or purchased by International Paper.

5.6.3 The contractor manager is also considered the chemical requester; therefore, the requirements listed under 5.4 apply.

5.6.4 Provide the completed Chemical Profile to the contractor using the product. The contractor is responsible for reviewing this information and complying with the identified requirements.

6.0 Procedures

6.1 General Approval Requirements

6.1.1 All chemicals must be reviewed and approved by Loss Prevention and Environmental Engineering prior to purchase.

6.1.2 All chemicals brought onto the Franklin Mill must have an accurate, complete and legible Material Safety Data Sheet.

6.1.3 A separate chemical review is required for each chemical including those chemicals that are manufactured by more than one manufacturer.

6.1.4 The Manufacturer's Pre-Request Form shown in Attachment 1 is required to be completed for all chemicals. The chemical requester is responsible for obtaining the necessary information.

6.1.5 A new chemical approval is required if the purpose or application of the chemical changes. This review is necessary to determine environmental storage and inventory requirements, as well as ensure compliance with the Franklin Mill Hazard Communication Program.

6.1.6 No chemicals are permitted to be ordered using procurement or travel cards. (Note exception in 6.1.9). This includes chemicals that are on the mill approved chemical list. This is necessary for chemical use, inventory tracking, and to ensure that appropriate training is provided.

6.1.7 Office chemicals (e.g.: white out, copier toner) may be purchased using procurement cards

6.1.8 Contractor chemicals may be ordered by International Paper Contractor Managers. The Material Safety Data Sheets associated with those chemicals purchased for the contractor must be provided to the contractor, so that he may effectively train the employees handling the product on the associated hazards.

6.2 Standard Mill Chemical Approval

6.2.1 The chemical requester must provide the following information to Loss Prevention using the mill request form in Chemical Profile System:

6.2.1.1 Name of chemical

6.2.1.2 Manufacturer of chemical

6.2.1.3 Usage Rate

6.2.1.4 Expected Maximum Inventory

6.2.1.5 Volume and type of container/packaging in which the chemical will be stored.

6.2.1.6 Location of storage and use

6.2.1.7 Description of how chemical will be used

6.2.1.8 Chemical that new chemical replaces, if applicable.

6.2.1.9 Description of how much chemical will be wasted and proposed plans for disposal.

6.2.1.10 MSDS for the chemical

6.2.1.11 Environmental Pre-Request Form

6.2.2 Next, Loss Prevention must perform the following:

6.2.2.1 Review MSDS for completeness and accuracy.

6.2.2.1.1 If the MSDS is not complete, accurate, or legible then Loss Prevention must contact manufacturer for the required information or another copy of MSDS.

6.2.2.1.2 If MSDS complete, accurate and legible, Loss Prevention will scan the MSDS and create a Chemical Profile for the chemical.

6.2.2.2 Complete Components and Loss Prevention sections of Chemical Profile.

6.2.3 Next, Environmental Engineering will complete the Environmental Section of the Chemical Profile.

6.2.4 The Department Manager must then review the Chemical Profile and approve the chemical for use in the department.

6.2.5 Loss Prevention will then publish the Chemical Profile and MSDS to SAROS. In addition, Loss Prevention will forward a hard copy of the Chemical Profile to the Requestor.

6.3 Trial Chemical Approval

6.3.1 The standard mill chemical approval process as described in 6.2 must be followed.

6.3.2 Trial chemicals will only be approved for use for one (1) year. Upon exceeding this time period, it must be determined whether the chemical will be:

6.4.2.1 Disposed of or returned to the vendor

6.4.2.2 Re-approved as a trial chemical

6.4.2.3 Made a mill standard chemical

6.3.3 Loss Prevention will be responsible for sending a quarterly report regarding the status of trial chemicals.

6.4 Contractor Chemicals

6.4.1 Contractors are responsible for providing the International Paper Contractor Manager with the information listed in 6.2.1 as soon as possible prior to the beginning of the work.

6.4.2 The Contractor Manager will then complete the request form for Contractor Chemicals in the Chemical Profile system and forward the MSDS to Loss Prevention.

6.4.3 Loss Prevention will then initiate the review process as listed in sections 6.2.2 and 6.2.3.

6.4.4 The completed Chemical Profile and MSDS will then be published in SAROS by Loss Prevention.

6.4.5 The IP Contractor Manager must provide a copy of the Chemical Profiles to the contractor.

6.5 Temporary Removal or Termination of Standard Mill Chemicals

6.5.1 Loss Prevention must be notified if a chemical is being replaced or will no longer be used. The notification must include:

6.5.1.1 Name and manufacturer of chemical

6.5.1.2 Date when chemical will be off site

6.5.2 After the off-site date, Loss Prevention will mark the chemical as inactive in the Chemical Profile database. At this time, the chemical can no longer be used on-site.

6.6 Manufacturer Name Change

6.6.1 A new MSDS must be reviewed by Loss Prevention if there is any change in the product (trade name, manufacturer, components, etc.).

6.6.2 Loss Prevention will update the Chemical Profile and MSDS and determine if further review by Environmental Engineering and Department Management is necessary.

6.7 Auditing

6.7.1 Loss Prevention must conduct and document an annual audit of this procedure.

7.0 Training

7.1 Employees who purchase, request or approve chemicals must be trained on this procedure every two years.

8.0 Documentation

8.1 MSDS must be maintained for 30 years past the last date of use.

8.2 Chemical Profiles must be kept until superseded or for 30 years past the last date of use.

Attachment

Chemical Management

ATTACHMENT 1

The following information is required for International Paper's Chemical Management Database. Please complete this form for any information that is not on the product MSDS.

Infor on MSDS	Product Name	
	Components	CAS: Max. % weight: CAS: Max. % weight: CAS: Max. % weight: CAS: Max. % weight: CAS: Max. % weight:
	Density/specific gravity	
	pH	
	VOC content	%
	Container	Type: Volume/weight:
	Regulations	
	Contains California Prop 65 chemicals	Yes No
	Contains SARA Extremely Hazardous Substances	Yes No
	Contains CAA Hazardous Air Pollutants	Yes No
	Contains CERCLA chemicals	Yes No
	Contains RCRA chemicals	Yes No
	Contains SARA Section 313 chemicals	Yes No
	Contains FIFRA regulated chemicals	Yes No
	TSCA listed	Yes No
	FDA approved	Yes No 21 CFR Section:
	Aquatic Toxicity data	Organism: LC50_____ NOEC _____
	Contains Phosphorus Compounds	Yes No
	Contains Nitrogen compounds	Yes No
	Contains dioxin pre-cursors (dibenzofurans /dibenzodioxins)	Yes No
	Contains Clean Water Act section 307(1)(a) priority pollutants	Yes No
	Contains chlorinated organic compounds	Yes No
	Contains Alkylphenols, alkylphenol ethoxylates, Nonylphenolic compounds, or nonylphenol ethoxylates.	Yes No

Signature:_____ Date:_____ Title:_____