

**Gulf of Mexico**



## **Operations: HSE**

### **Health and Industrial Hygiene**

#### **GoM Region Hazard Communication Safe Work Practice**

**AMENDMENT RECORD**

Revision Date	Authority	Custodian	Revision Details
07/18/16	Health Manager	Industrial Hygienist	<p>Reformat and editorial changes throughout the document.</p> <p>Updated roles and responsibilities. HS Advisor/SL will be responsible for safety review of the new chemical.</p> <p>Added hazard communication requirements for the incidental chemical spill/release cleanup.</p> <p>Updated site-specific HAZCOM plan form in Appendix A.</p> <p>Revised new chemical evaluation request form in Appendix C and new chemical approval process flowchart in Appendix B.</p> <p>Added in HAZCOM Self-Verification Checklist and HAZCOM Labels Field Checklist in Appendix C.</p> <p>Updated the GoM product register and product SDSs in Appendix D.</p> <p>Removed contractor hazard communication SWP notification letter from Appendix E.</p> <p>Removed TSCA Awareness Posting from Appendix F.</p> <p>Updated TSCA allegation form in Appendix G and changed it to Appendix E.</p> <p>Added SDS Request Form in Appendix F.</p>
04/30/13	Director, Health and Safety	Health and Industrial Hygiene Team Leader	<p>Section 2 – Added definition of Hazard Information</p> <p>Section 4 – Specified requirement to update and annually review the site-specific HAZCOM SWP.</p> <p>Section 5.4.1 – Clarified training of new personnel</p> <p>Section 5.4.2 – Clarified training of existing personnel</p> <p>Appendix B – Updated the flow to add clarity to the new chemical approval process</p> <p>Appendix D – Updated SDSs for BP produced products.</p>

<p>02/6/13</p>	<p>Director, Health and Safety</p>	<p>Health and Industrial Hygiene Team Leader</p>	<p>Section 1 – Revised scope to include Product Stewardship and TSCA reporting.</p> <p>Section 2 – Defined allegation, removed specific hazard definitions, defined HAZCOM, Product Stewardship, BP GoM Product Register changed MSDS to SDS.</p> <p>Section 3 – Added HAZCOM awareness general requirement.</p> <p>Section 4 – added Health and Industrial Hygiene Team Leader responsibilities, defined role of Global Product Stewardship group.</p> <p>Section 5.2.1 – Removed dedicated workstation requirement</p> <p>Added the following Sections regarding Product Stewardship:</p> <p>Section 5.2.5 – Register of BP GoM products</p> <p>Section 5.2.6 – Chemical Continuance</p> <p>Section 5.2.7 – Issuing SDSs to Customers</p> <p>Section 5.2.8 – Managing SDSs in BP GoM</p> <p>Section 5.2.9 – Requests for BP GoM SDSs</p> <p>Section 5.2.10 – Requesting a New SDS</p> <p>Sections 5.2.11- Review of Current GoM Product SDSs</p> <p>Section 5.7 – Product Development</p> <p>Section 5.8 – Product Assessment</p> <p>Section 5.9 – Recall of BP Products</p> <p>Added the following Sections regarding TSCA Reporting:</p> <p>Section 5.10 TSCA Reporting</p> <p>Section 5.11 Incident Investigation Process</p> <p>Section 5.12 Emergency Response</p> <p>Added Appendix D to enclose the BP GoM Product Register</p> <p>Added Appendices E through G in reference to TSCA reporting</p> <p>Attached previously associated documents as appendices A through H</p>
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06/30/12	Director of Health and Safety	Health and Industrial Hygiene Team Leader	<p>Changed 3E SDS service to 3Eonline.com. Changed GoM Senior Industrial Hygienist to GoM Industrial Hygiene Team. Changed document authority. Specified requirement of HSSE Site Leads to complete annual inventory reporting requirement. Changed the new chemical process with the following adjustments:</p> <ul style="list-style-type: none"> <li>• New Chemical Request Approval Form</li> <li>• Quarterly chemical inventory download</li> <li>• Requirement of pre-arrival notification for chemicals being brought aboard by contractors.</li> <li>• Addition of 3Eonline workstations at all facilities.</li> <li>• New and transferred employee end-user 3Eonline training.</li> <li>• Labeling requirement for stationary containers at all facilities.</li> <li>• Added the OSHA definition of "Label".</li> <li>• Defined secondary container.</li> </ul> <p>Added section 5.3.3 to address secondary containers containing hazardous chemicals.</p>
12/19/08	Dennis Johnson	Joe Gallucci	<p>Added on-line 3E SDS service to HAZCOM program. Edited the chemical inventory process to include a revised form. Changed contact information to Joe Gallucci.</p>
01/31/06	S. Garner/S. Tink/C. Jackson/R. DeLeonardis	Jack Kogut	<p>No content changes. Changed CD # from 10037 to UPS-US-SW-GOM-HSE-DOC-00107-2 to conform to numbering nomenclature in the GoM HSSE doc base. Changed 2 authorities as well. Modified revision dates on the following forms and flowchart to match revision date of main procedure:</p> <ul style="list-style-type: none"> <li>• GoM New Chemical/Product Approval Request Form</li> <li>• GoM Contractor Hazard Communication Program Notification (Example)</li> </ul>

			<ul style="list-style-type: none"> <li>• GoM Site-specific Hazard Communication Form</li> <li>• GoM Chemical Inventory Form</li> <li>• GoM Hazard Communication – New Chemical Approval Process Flowchart</li> </ul>
06/01/03	S. Garner/B. Herbert/ R. DeLeonardis/S. Flynn	Jack Kogut	<p>Key changes to this document include:</p> <ul style="list-style-type: none"> <li>• approval of the use of new chemicals in the field to be coordinated and approved through HSE,</li> <li>• Industrial Hygiene Coordinator to review current products by each field location as a group,</li> <li>• tightened responsibility process for HAZCOM and documentation of responsibility for key areas such as training, chemical approval, program implementation, and contractor safety,</li> <li>• training information reflects the current GoM Health and Safety Training Matrix, CD # 10087,</li> <li>• change in custodian,</li> <li>• additional links to internal and external SDS sites to assist field in getting SDSs and</li> <li>• a flowchart of the new chemical approval process and four new HAZCOM forms.</li> </ul>
07/01/02	S. Garner/B. Herbert/ R. White/S. Flynn	Ray Britt	Amended Section 5.5 to align training requirements with the GoM HSE Training Matrix.
01/23/02	S. Garner/B. Herbert/ R. White/S. Flynn	Ray Britt	Initial issue as controlled document. Prior revision history located in hard-copy consolidated manual.

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## 1. Purpose/Scope

The purpose of the BP Gulf of Mexico (GoM) Region Hazard Communication (HAZCOM) Safe Work Practice (SWP) is to provide employees and contractors with information relative to the chemical hazards at their assigned facility and ensure the continual assessment and management of chemicals and products produced by or handled within the GoM Region.

This SWP conforms to the requirements of OMS 3.4 – Health and Industrial Hygiene, SEMS Regulations 30 CFR 250.1913, and the OSHA Hazard Communication Standard (29 CFR 1910.1200), which, regulates all chemical substances that present a physical or health hazard to workers. This SWP also assists in conformance with OMS 7.5 – Product Stewardship, and further provides guidance regarding how BP GoM Region will comply with the Toxic Substances Control Act (TSCA) Section 8(c) & 8(e) requirements.

## 2. Key Responsibilities Offshore Installation Manager (OIM) or the Person-In-Charge (PIC) The person having the overall responsibility for the implementation of the GoM Hazard Communication SWP at the installation.

### 2.2. Health Manager

- A. Serve as technical support regarding development and updating of this HAZCOM SWP.
- B. Provide assurance the GoM Region HAZCOM SWP is being effectively implemented by developing and monitoring leading and lagging indicators of its effectiveness in providing chemical and product safety information to workers.
- C. Assess at defined intervals the results of self-verifications and audits to identify trends, emerging risks and opportunities to improve this SWP.
- D. Serve as the TSCA Coordinator, and is responsible for handling TSCA allegations and communicating with Global Product Stewardship & Toxicology Americas (GPS&TA).

### 2.3. Health and Safety Site Lead / Advisor

- A. Coordinate with the site teams to complete annual site chemical inventory review and provide changes to Industrial Hygienist (IH) to update in 3E Online.
- B. Complete quarterly backup of facility safety data sheet (SDS) databases stored on 3E Online.
- C. Complete the facility's site-specific HAZCOM Plan, update as necessary and review at least annually.
- D. Provide training to personnel on their facility's site-specific HAZCOM plan.
- E. Conduct quarterly workplace chemical labeling/signage verification for shipped containers and stationary equipment using HAZCOM Labels Field Checklist or HAZCOM Self-Verification Checklist (Appendix C).
- F. Verify new chemicals that are brought to the facility have been evaluated and approved by HSE, and added in the facility's chemical inventory.
- G. Assist in the new chemical evaluation and approval process and act as the safety review approver.
- H. Verify TSCA reporting information is posted on the site bulletin board.

## **2.4. Industrial Hygienist (IH)**

- A. Maintain the GoM HAZCOM SWP. Update the document and roll out the updates according to the document review schedule. Act as the point of contact for questions or concerns regarding the HAZCOM SWP.
- B. Maintain the 3E Online database and ensure BP GoM has unrestricted access to the SDS database. Provide 3E Online administrator training as needed.
- C. Receive and review the annual chemical inventory reports from each facility for clarity and completeness, and update the chemical inventories in 3E Online accordingly.
- D. Serve as the Health and Industrial Hygiene chemical reviewer for new chemical requests.
- E. Conduct assessment of BP GoM product SDSs at least every 3 years and ensure changes are made as appropriate to maintain compliance with applicable regulations.
- F. Request updates or creation of new SDSs, as well as assistance from GPS&TA as appropriate.

## **2.5. Environmental Advisor**

Review and approve new chemical requests to ensure compliance with regulatory water requirements, hazardous waste disposal and shipping regulations and permits.

## **2.6. Global Product Stewardship & Toxicology Americas (GPS&TA)**

- A. Deliver up to date BP GoM owned and authored SDSs and TSCA (8c)/(8e) reporting forms that are compliant with current regulations.
- B. Serve as advisors to BP GoM on issues related to product stewardship, SDSs, evaluation of health and environmental hazards of products, and regulatory issues related to chemical management.

## **2.7. Facilities/Process Engineer**

Inform GoM IH of any new GoM product or changes of the existing product to initiate a request to create a new product SDS or update the existing SDS.

# **3. Process**

## **3.1. Chemical Hazard Risk Assessment and Communication**

Applicable chemical hazards and risks shall always be considered and assessed during the task risk assessment and controlled through the GoM Control of Work process. Affected personnel shall be communicated with the chemical hazards and safe handling precautions/control measures before the commencement of the job.

## **3.2. Site-Specific HAZCOM Plan**

The OIM or PIC shall implement a written, site-specific hazard communication plan. This plan specifies the site-specific methods (e.g., method of site signage/labeling) and the responsible parties for



implementing the requirements outlined in this BP GoM HAZCOM SWP. The key elements in the site-specific plan include:

- where the written site-specific hazard communication SWP is maintained and accessible to employees on all shifts,
- what kind of labels and other forms of warning(s) are utilized,
- location of safety data sheets (SDSs) and maintaining chemical inventory,
- new chemical approval,
- other employee information and training requirements and,
- conditions of multi-employer worksites.

See Appendix A for a copy of the GoM Site-Specific Hazard Communication Plan form.

### 3.3. 3E Online Safety Data Sheet (SDS) Database

Each location maintains an online database (3E Online) which contains SDS for each hazardous chemical (BP produced or purchased products) covered by the HAZCOM SWP that is used at that location. Each facility will ensure that everyone on the facility has access and is trained on how to find an SDS. Each facility shall deploy a right-to-know workstation with the purpose of providing access to 3Eonline.com. 3E Online is also available on OMS Navigator and GoM HSE website.

The link to access 3E Online database is: [3E Online](#)

### 3.4. Quarterly Electronic SDS Back-up

Once a quarter each facility is required to download the chemical inventory and SDSs electronic back-up to the Right-to-Know station C Drive and to a DVD or removable flash media. MAXIMO will provide a quarterly reminder for each facility and provide guidance for completing this task.

### 3.5. Chemical Inventory

The Chemical Inventory is a list of hazardous chemicals known to be present in the work place, which can be cross-referenced to a matching SDS on 3E Online and container labels present at the facility. The chemical inventory is maintained through 3E Online and can be printed off by going to "Inventory Reports" and generating a report for the site. The facility's chemical inventories shall be reviewed by the associated teams (e.g., Production, Maintenance, Marine, Construction, Wells, etc.) annually to identify the following chemical changes:

- the chemicals that are no longer in use;
- the chemicals that are supplied by different manufacturers; and
- the chemicals that are missed from the inventories.

The annual chemical review results with the identified changes are consolidated by the HS SLs and submitted to GoM IH to update in 3E Online.

### 3.6. New Chemical Evaluation

When selecting a chemical to use at a facility, it is encouraged to search the facility chemical inventory first to identify if the chemical has already been approved for the same use in the facility, and choose the same one if possible. Before a new chemical is purchased, the health, safety and environmental risks associated with the chemical shall be assessed and approved. It is the goal of BP GoM to use the least hazardous chemicals when feasible. Purchasers should consider ordering less toxic materials when possible. If a new chemical is to be purchased for a field trial or use, a Management of Change (MOC) process is required in addition to the new chemical review. Refer to the BP GoM Management of Change (MOC) policy for further details.

Prior to requesting any new chemical that will be used on the facility, the chemical requester is responsible for obtaining the latest copy of the SDS and completing the New Chemical Evaluation (NCE) Request form (Appendix C). The form and the SDS shall be provided to the facility's HS Site Lead or GoM IH for review and approval by the HSE department. Refer to Appendix B New Chemical Approval Process Flowchart for a more detailed overview.

The health and safety evaluation shall include a review of the SDS for the health and physical hazards and properties, and the recommendations for the appropriate handling precautions (e.g., PPE) when the chemical is used as described on the NCE Request form.

The environmental evaluation of the SDS shall include a review of the waste disposal, water discharge and toxicity testing information.

Prior to a new chemical being ordered, this approval process shall be completed. The approved chemical SDS will be uploaded to 3E Online system under the facility-specific inventory.

All chemicals must be requested and ordered on a Purchase Order utilizing a Material Master. The chemical requestor shall work with the Onshore Materials Coordinator to build the material master prior to purchase. Utilization of the material master in Backbone will enable enhanced tracking of the type and quantities of chemicals purchased and in use.

### 3.7. Archiving Chemicals

GoM IH shall be notified by the facilities when the chemicals are no longer in use. Their SDSs shall be archived in 3E Online and available for no less than 30 years. The chemical inventory will be automatically updated to reflect the date that the chemical is archived.

### 3.8. BP GoM Product SDSs

#### 3.8.1. Managing GoM Product SDSs

BP GoM's SDSs for all products (e.g. crude oil, condensate, natural gas and process streams (e.g. produced water)) are authored by the GPS&TA based in Naperville, IL, USA. All BP authored SDSs are stored in the Comply Plus (<http://msds.bpweb.bp.com/>) website managed by the GPS&TA. An electronic copy of all GoM product SDSs are available and maintained in the 3EOnline SDS database.

GoM IH will review current BP GoM Product SDSs at least every 3 years and ensure changes are made as appropriate to maintain compliance with applicable regulations.

### **3.8.2. Requesting an SDS for a New Product / Stream or Changes to the Existing Products**

A new SDS may be required if a new process stream comes on-line (e.g. desulfurization effluents) or an existing product is marketed in a new country. Any changes to existing BP product SDSs must be communicated to both the HS SLs, the GoM IH and GPS&TA. It is the responsibility of the asset's Facilities Engineers to communicate any changes of the products so that an updated SDS may be created within six months from becoming aware of the new information, and uploaded in the 3E Online database.

If a new SDS is required, or if an existing SDS requires revising, the procedure is as follows:

- The request shall be initiated in an email from the asset facilities engineer to the GoM IH. The request shall contain the full details of the reason for the new request or change, (e.g. changes to legislation, change of formulation, etc.)
- GoM IH will contact GPS&TA and discuss the request.
- All SDS requests to GPS&TA shall be made through the following process by GoM IH:
  - Visit the [Product Safety Communications](#) website
  - Click “SDS Requests” in menu
  - Click “Non-Lubricants SDS requests” and follow the instructions
- Before GPS&TA can process a request, they require that a SDS Request Form (Appendix F) is completed and submitted to them with information on composition of the material, physical characteristics, manufacturer’s addresses and emergency contact information, and any other relevant information.
- GPS&TA may initiate SDS revisions for a material at any time if significant new hazard information becomes available on the material or a component of the material. GoM IH will collate the information and liaise with GPS&TA.
- Once the new/revised SDS has been produced, the GoM IH will update the register of BP GoM products (Appendix D) and ensure that the changes are available on the 3E Online SDS database and communicated.

### **3.8.3. Requests for BP GoM Product SDSs**

New or amended SDSs shall be issued to customers receiving BP GoM products through sales pipelines and terminal locations. BP GoM is obligated to provide an SDS upon request.

BP GoM may receive SDS requests in a variety of ways from customers, other companies and local legislative bodies. All requests that cannot be handled locally shall be forwarded to GoM IH with the details of the requests to assure that the correct information is issued.

## **3.9. Labeling and Other Forms of Warning**

### **3.9.1. Container Labeling**

Every produced product or purchased chemical brought to, or shipped from, the facility shall be labeled. The site Operations/Wells personnel, chemical champion and HS SL shall verify, request and/or update

labels on chemicals in use or storage at the facility. The product identifier and manufacturer name on the label shall be identical to the information on the SDS in 3E Online.

Labels on hazardous chemical containers (e.g., tanks, drums, cylinders) at the worksite and shipped from the facilities shall include the following information:

1. Product identifier
2. Signal word
3. Hazard statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address and telephone number of the chemical manufacturer, supplier, importer or other responsible party

Labels shall not be removed or defaced on purchased containers of hazardous chemicals, unless the container itself is immediately marked with the required label information

The labels shall be legible, written in English, and prominently displayed on the container. Label information can also be displayed in alternate languages where multiple employees speaking other languages are present, provided the label information is presented in English as well.

If the chemical is produced by BP GoM, the label shall be revised within six months after recognition of new information.

Should a hazardous chemical be part of an OSHA substance-specific standard, labeling shall also be in accordance with the requirements of that standard.

### **3.9.2. Stationary Process Equipment**

Stationary process equipment (e.g., vessels, tanks) could use alternative methods to identify chemical hazards instead of affixing labels. These methods could include signs, placards, process sheets, batch tickets, operating procedures, etc., as long as the method identifies the applicable containers, conveys the identity of the chemical, and appropriate hazard warnings which is aligned with the information in Section 2 of the chemical SDS.

### **3.9.3. Immediate Use Containers**

Portable containers, into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use of the worker who performs the transfer, may not be labeled. This exemption is limited to use during a single work shift and to containers within the control of a single worker.

## **3.10. Incidental Chemical Spill/Release**

When an incidental chemical spill/release occurs, before any cleanup is to be performed, personnel shall be fully aware of the hazards and proper cleanup method and protection. Inform the Health & Safety Site Lead and/or GoM IH immediately and refer to the chemical SDS and Industrial Hygiene Incident Response Guides (Appendix C) for guidance. Activate the emergency response process if the spill/release cannot be easily controlled.

### 3.11. Contractor Programs

It is the responsibility of the person(s) identified in the site-specific hazard communication plan to inform the contractor's representative at the start of a project, or upon assignment, of the hazards associated with the chemicals that the contractor's employees may encounter during their work at that facility. In addition, the contractor shall be informed of the precautionary measures they can take and the labeling systems used.

Each contractor is notified of where the SDSs are located as well as the chemicals on location during site orientation.

Before contractors bring any chemicals to the facility, the chemical information (e.g., SDSs) shall be submitted to their BP representatives to verify the chemicals have been properly evaluated and approved and are available in 3E Online chemical inventory under the same facility. Any new chemical should go through the same new chemical review and approval process as stated in Section 3.5.

BP employees who are expected to be associated with the contractor's work shall be made aware of the appropriate hazards regarding the chemical(s) being used.

## 4. Personnel Information and Training

Personnel with the potential for exposure to hazardous chemicals in the course of their routine responsibilities or in a foreseeable emergency shall receive hazard communication training at the time of their initial assignment and whenever a new chemical hazard is introduced at their worksite. GoM provides the following hazard communication related training and information:

1. Hazard Communication: An Employee's Right 0020221ZP (HAZCOM CBT) is designed to comply with the OSHA HAZCOM Standard training requirement.
2. GoM Region Hazard Communication Safe Work Practice
3. Site-specific Hazard Communication Plan
4. Site-specific orientation/training shall include information on hazards present at the facility, location of the 3E Kiosk and the chemical review/approval requirement.
5. GoM HAZCOM 3E Admin Training
6. Chemical-specific information shall always be available through labels and safety data sheets.

Multiple methods shall be used to inform personnel of new/existing chemical hazards for routine and non-routine tasks, including:

1. Pre-job planning meeting
2. Risk assessment
3. Safety meeting/tool-box talk
4. Work permit
5. Standard operating procedure
6. Safety bulletin/posting

## 5. Program Evaluation

The GoM IH shall review this Hazard Communication Program every five years or sooner if regulation changes.

The Site-specific Hazard Communication Plan shall be documented on the Site-Specific Hazard Communication Plan form (Appendix A) and reviewed annually.

The Hazard Communication Self-Verification form (Appendix C) can be used onsite to assess program compliance and conformance.

Quarterly chemical container labeling verification could be conducted using the HAZCOM Labels Field Checklist or the Hazard Communication Self-Verification form (Appendix C).

## 6. Recordkeeping

All training is to be documented by the individual conducting the training and copies sent to the BP GoM training group for record. Training can also be completed by the use of CBT that will be electronically input via VTA. Training records will be maintained for length of employment plus 30 years.

Chemical inventories will be maintained in the chemical inventory database for a minimum of 30 years.

## 7. TSCA 8(c) and 8(e) Reporting

The process to be followed for TSCA 8(c) / 8(e) reporting is as follows:

- The BP GoM workforce will be made aware of TSCA requirements as part of the site communication and in bulletin board posting. The TSCA awareness poster shall be posted at all BP GoM Region onshore and offshore facilities and updated annually.
- Employees that observe potential TSCA 8(c) / 8(e) reporting issues or that are making allegations of adverse effects due to chemicals shall contact their HS SL, GoM IH (TSCA Coordinator), as well as their supervisor.
- Appropriate TSCA 8(c) / 8(e) reporting forms will be completed by the individual and HS SL. The GoM TSCA Coordinator will coordinate any reviews with GPS&TA. This form can be found in Appendix E.
- GPS&TA staff will decide if TSCA 8(e) notification should be sent to the US EPA, and will keep records of TSCA 8(c) allegation forms and evaluations.
- GoM will be informed of the outcome of the evaluation and copies of materials will be provided back to GoM TSCA Coordinator.

## 8. Definitions/Acronyms

Terms	Description
3E Online	A third party maintained web site/database purchased by BP and used as an online Right-to-Know station to access Safety Data Sheets (SDSs) from a common or personal computer.

Terms	Description
Allegation	A specific allegation made in writing by an employee, customer, or member of the general public regarding potential harmful effects to human health and/or the environment believed to result from BP products or operations.
Container	Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
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..
Hazard Communication	The regulatory requirement 29 CFR 1910.1200, updated and published March 26, 2012, set forth by the Occupational Safety and Health Administration (OSHA), in which employers, chemical manufacturers and importers must assess the hazards associated with chemicals and materials in their workspaces and inform their workers of those hazards.
Hazard Information	Information specific to the physical and health hazards of a substance or material that may also be found on its associated SDS. This information includes: Pictograms, signal words, physical, health and environmental hazard statements, target organs, and any precautionary statements.
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. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to §1910.1200 Health Hazard Criteria.
Immediate Use	A 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.
Label	Means 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.
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. See Appendix B to §1910.1200 Physical Hazard Criteria.
BP GoM Product Register	A list of defined products or streams that are specifically produced by BP GoM operated facilities and their associated Safety Data Sheets. This does not include any products produced by third parties or vendors.

Terms	Description
Safety Data Sheets (SDS)	Written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of §1910.1200.

## 9. Key Documents, Tools, References

[Occupational Safety and Health Administration, Department of Labor; 29 CFR 1910.1200 Hazard Communication](#)

[GoM Management of Change \(MOC\)](#)

- Appendix A – GoM Site-Specific Hazard Communication Plan Form
- Appendix B – New Chemical Approval Process Flowchart
- Appendix C – GoM New Chemical Product Evaluation Request Form; HAZCOM Self-Verification Checklist; HAZCOM Labels Field Verification Checklist
- Appendix D – Register of BP GoM Product SDSs
- Appendix E – Allegation of Significant Adverse Reaction to Health or Environment – TSCA, section 8(c), Allegation Summary Form
- Appendix F – SDS Request Form for Generating GoM Product SDS



## Appendix A



### GoM Site-Specific Hazard Communication Plan

The Offshore Installation Manager (OIM) or person-in-charge (PIC) is responsible for and implementation of a Site-Specific Hazard Communication Plan. The form below serves as the required site-specific plan once completed.

Location/Platform #:

The SDS 3EOnline kiosk is located:

Those personnel identified below are responsible for implementing the Site-Specific Hazard Communication Plan:

*(identify by name or job title)*

The personnel responsible for maintaining 3EOnline.com and Chemical Inventory and quarterly SDS back-up (Section 3.2 – 3.4):

*identify by name or job title*

The personnel responsible for processing the New Chemical/Product Approval Requests, as outlined in Section 3.5 New Chemical Evaluation, and updating the facility PPE Hazard Assessment form for approved chemicals:

*(identify by name or job title)*

The personnel responsible for completing and forwarding the annual Chemical Inventory review report to the GoM IH, and verifying container labels (Section 3.8):

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*(identify by name or job title)*

The personnel responsible for conducting and documenting training on the hazards and SDS content of new materials (Section 4):

*(identify by name or job title)*

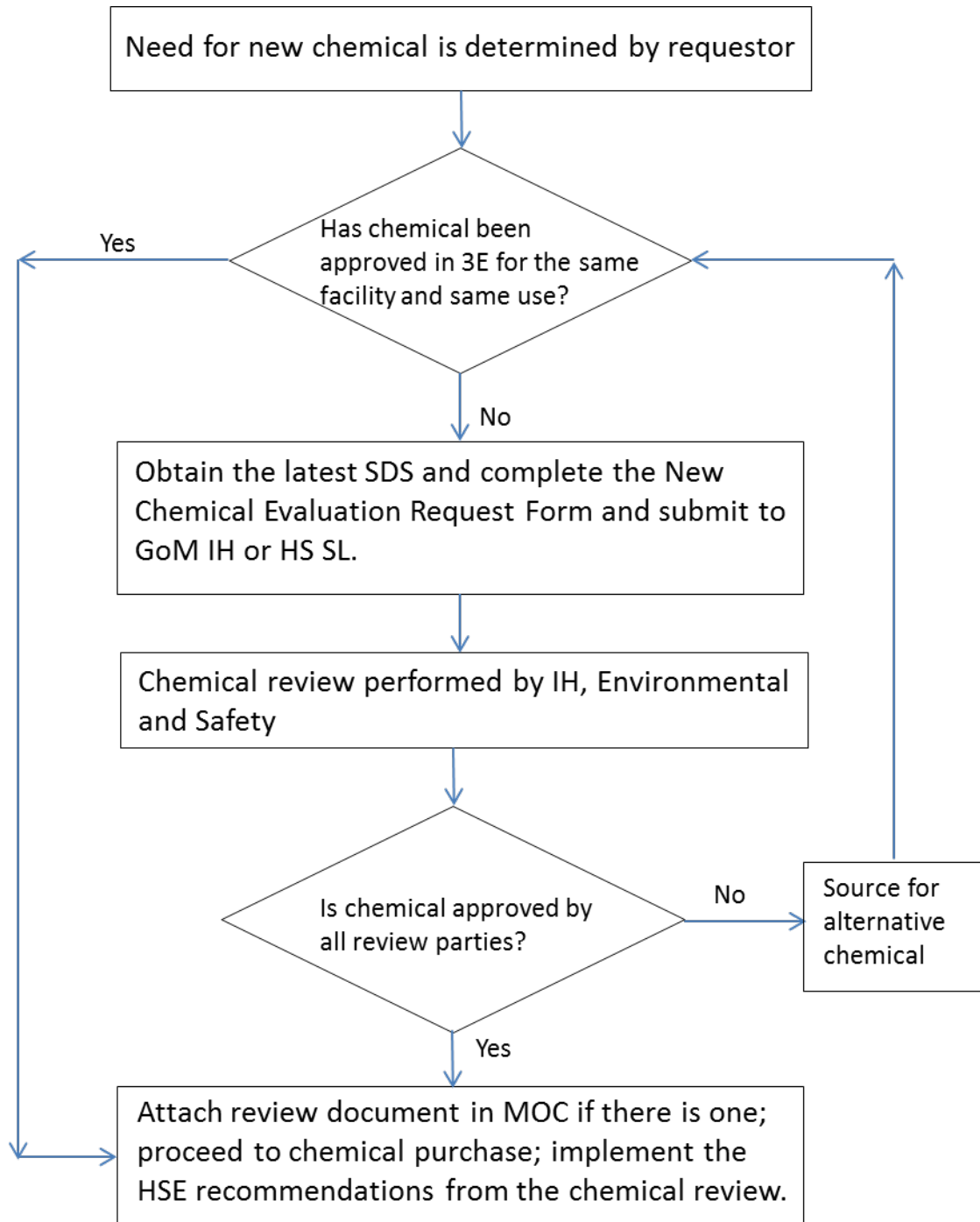
The personnel responsible for contractor hazard communication (Section 3.9 Contractor Programs):

*(identify by name or job title)*

Chemical Champion if applicable:

*(identify by name and job title)*

## Appendix B Hazard Communication – New Chemical Approval Process Flowchart



## Appendix C

### A. New Chemical Evaluation Request Form



New Chemical  
Evaluation Request F

### B. Hazard Communication Self-Verification Checklist



Hazcom SV Checklist

### C. HAZCOM Labels Field Checklist



Hazcom Labels Field  
Checklist






### D. Industrial Hygiene Incident Response Guide



IH Incident  
Response Guides.doc

## Appendix D

**Register of BP GoM Region Product SDS's**

<b>BP Product Name</b>	<b>SDS Number</b>	<b>Revision Date</b>	<b>PDF</b>
Condensate (Sweet)	2806	04/22/2015	 Condensate - Sweet_GHS Final.pdf
Natural Gas (Sweet)	2702	04/22/2015	 Natural Gas - Sweet_GHS Final.pdf
Petroleum - Crude (Sweet)	2895	05/18/2015	 Petroleum Crude Oil - Sweet_GHS Final.pdf
Produced Water (Sweet)	3521	04/22/2015	 Produced Water - Sweet_GHS Final.pdf
Nitrogen	4058	04/22/2015	 Nitrogen_GHS Final.pdf

## **Appendix E**

### **Allegation of Significant Adverse Reaction to Health or Environment— TSCA, Section 8(c), Allegation Summary Form**



TSCA 8(c) Allegation  
Summary Form.docx

## Appendix F

### SDS Request Form for Generating GoM Product SDS



SDS Request  
Questionnaire.xls