BASF We create chemistry	**Title:** Hazard Communication Rev 8			
	Function: EHS			
Beaumont Site	**Procedure No.:**	BMEHS-002.013	**Reviewed:** 07/22	**Page:** 1 of 17
Preparer: EHS Specialist	**Owner:** EHS Manager		**Approver:** Site Manger	

Revision Number	Revision Description	Revised By	Revision Date
00	*Considered as starting document for revision change table*		
01	Update to new format and update with new regulatory requirements	SS	03/09
02	Added requirements for Health & Safety Advisory 182	G. Dawson	10/14
03	Added GHS labeling requirements do not include pesticides, added definition for pesticide and FIFRA.	G. Dawson	6/15
04	Added Label ordering information	G. Dawson	6/16
05	Compliance to BC032.033	G. Dawson	10/17
06	Updated 3E Online to 3E Protect ™	G. Dawson	01/18
07	Updated In-Plant Labeling	J. Ojeda	05/18
07	Procedure Reviewed, minor changes to reflect current process	G. Dawson	03/20
08	**Updated procedure to include inventory of Hazardous Substances per** Safety and Health Alert 0281. Added **STA-008: Communication of Chemical Hazards Document Index Link**	G. Dawson	07/22

1. PURPOSE 2
2. DEFINITIONS 2
3. SCOPE 3
4. PROCEDURE 3
5. RESPONSIBILITIES 15
6. REFERENCE DOCUMENTS 15

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1. PURPOSE

1.1. To ensure that all information regarding the hazards associated with chemicals used and produced at the Beaumont Facility are communicated to employees and contractors working on the plant site.

2. DEFINITIONS

2.1. Article

2.1.1. A manufactured item other than a fluid or particle which:

- Is formed to a specific shape or design during manufacture; and
- Has end use functions dependent in whole or in part upon its shape or design during end use; and
- Which under normal conditions of use does not release more than a very small quantity of a hazardous chemical and does not pose a physical or health risk to employees.

2.2. Container

Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.

2.3. FIFRA

Federal Insecticide, Fungicide and Rodenticide Act. The objective of FIFRA is to provide federal control of pesticide manufacture, distribution, sale and use.

2.4. Hazardous Chemical / Material

Any chemical or material that has the capability of causing adverse health affects or presents a chemical or physical hazard.

2.5. Health Hazard

A chemical which causes adverse health effects such as carcinogens, irritants, reproductive toxins, corrosives, sensitizers, or highly toxic agents.

2.6. Pesticide

A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Though often misunderstood to refer only to insecticides, the term pesticide also applies to herbicides, fungicides, and various other substances used to control pests. Under United States low, a pesticide is also any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.

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2. DEFINITIONS CONTINUED

2.7. SDS

A written document that provides basic manufacturer information, hazardous ingredients, physical and chemical characteristics, fire and explosion hazard data, reactivity data, health hazards, safe handling and use, and control measures for hazardous chemicals.

2.8. Physical Hazard

Chemicals that can readily cause physical harm such as compressed gases, explosives, flammables oxidizers or water-reactants.

3. SCOPE

3.1. This procedure applies to chemicals used, stored or produced at the Beaumont facility which poses a health or physical hazard.

3.2. Note – This program includes information and guidance on container labeling and other forms of warning, safety data sheets (SDSs) and employee training. However, pesticide labeling is exempt from OSHA (GHS) labeling requirements and is out of the scope for this procedure.

3.3. This procedure does not apply to:

- Hazardous waste as defined by the EPA RCRA Regulation
- Hazardous substances being remediated under the EPA CERCLA Regulation
- Tobacco or tobacco products
- Wood or wood products
- Articles
- Food, drugs, cosmetics or other consumer goods when used for the purpose intended
- Ionizing and nonionizing radiation
- Biological hazards
- Pesticide labeling

4. PROCEDURE

4.1. Inventory of Hazardous Substances

4.1.1. All hazardous substances shall be listed in a facility-specific inventory. The inventory is to include raw materials, products, isolated intermediates, by-products, process-generated waste gases, effluents, or residues, and auxiliary materials.

4. PROCEDURE CONTINUED

4.1.2. The facility-specific inventory of hazardous substances shall contain at least the following information of each chemical.

- **Substance name (product identifier) and, where appropriate, an identification number (e.g., CAS number, BASF identification number such as BI, PBG, PRD, OR ART.**
- **Hazardous properties, i.e., classification and labeling information.**

4.1.3. The hazardous substances inventory is to be reviewed regularly and modified in the event of relevant changes (e.g., change of classification).

4.2. Hazard Determination

4.2.1. Health and Physical Hazard Evaluations – BASF Products

A. The health and physical evaluations of chemicals produced at the Beaumont facility are completed by Corporate Ecology and Safety.

B. The evaluation forms are completed and maintained by Corporate Ecology and Safety and are available upon request.

4.2.2. Health and Physical Hazard Evaluations – Raw Materials, non-BASF Material

A. The vendor SDS will serve as the written evaluation of the health and physical hazards of all raw materials and purchased chemicals. The SDS's will be reviewed by the EHS Department and the hazard information incorporated into the Hazard Communication Program as required. BASF Corporation Beaumont Site will rely on the Hazard Determination of the chemical manufacturer.

4.3. Labeling

4.3.1. Shipped Container Label

A. Each container of hazardous substances leaving the workplace must be labeled, tagged, or marked with at least the information included in the North American GHS Label Raw Reports obtained from GLM or by contacting NCR/R. See also NCU-OSA-STA-006: NA GHS Shipped Container Label.

B. Shipped container labels must be modified and any containers not shipped must be relabeled within six (6) months after becoming aware of new information.

C. Where the potential exists to have an oxygen deficient atmosphere from the introduction of an inert gas into bulk containers, the bulk containers must be tagged (See 4.6 for more information).

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4. PROCEDURE CONTINUED

4.3.2. Product Samples

- Identity of the material
- Appropriate hazard warning(s)
- Company name, address and emergency phone number

4.3.3. In-Plant Labeling

A. General

(1) BASF has established a program with an outside vendor (Marking Services Installation Inc (MSI)) to generate prefabricated Hazard Communication labels (referred to as BASF HAZCOM label) for applicable chemicals used and produced on-site which require labels. The workplace label media will work in conjunction with 3E Protect ™ and existing networked laser printers (maybe combination printer/scan/copy machines). Containers of hazardous substances in the workplace shall be labeled, tagged, or marked with at least the following:

1) Product Identifier
2) Hazard information, e.g., symbols, phrases, or numeric rating system
3) **Note: When a GHS classification is available for a hazardous substance, the BASF label available in 3E is a cost-effective way to create workplace labels**.

B. NA BASF Work Place Label Purchasing

(1) Use of NA BASF Work Place Label.

(2) Hand written labels shall be marked with indelible ink, legible and prominently displayed on the container.

(3) Worn or defaced labels must be replaced immediately.

(4) All labels are to be affixed to containers of hazardous materials so as not to obstruct any other information.

4.3.3. In-Plant Labeling CONTINUED

C. Incoming Container Labels

Labels on incoming containers of hazardous substances shall not be removed or defaced. The label on the incoming container will serve as the workplace label as long as it meets the requirements of E (2) below.

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D. Containers in Dedicated Service

As allowed by regulation (e.g., by 29 CFR 1910.1200), stationary process containers of hazardous substances in the workplace do not need to be labeled, tagged, or marked as long as other written materials are used.

- The written materials must include the specific container identifier and at least the information required in E (2) below.
- The written materials shall be readily accessible.

E. Non-Bulk Containers

(1) Process sample containers that are used by an employee over their work shift, and are intended for immediate use are exempted from the marking and labeling requirements as long as the container remains in the control of the individual collecting the sample.

(2) Other containers of hazardous substances in the workplace shall be labeled, tagged, or marked with at least the following:

1) Product Identifier
2) Hazard information, e.g., symbols, phrases, or numeric rating system
3) **When a GHS classification is available for a hazardous substance, the BASF label available in 3E is a cost-effective way to create workplace labels**.

F. Bulk Containers

(1) When chemicals are poured from a labeled primary container into a secondary container, the secondary container must be labeled as well unless it will remain in the possession of the person making the transfer.

(2) Process and Storage Containers of hazardous substances shall be labeled. Tagged, or marked with at least the following:

1) Product Identifier
2) Hazard information, e.g., symbols, phrases, or numeric rating system

4.3.3. In-Plant Labeling CONTINUED

G. Non-hazardous Waste

(1) Containers of waste characterized as ‘non-hazardous’ per the EPA RCRA Regulation shall be labeled in accordance with this procedure.

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(2) Labels for routinely generated non-hazardous wastes are included in the vendor label program.

(3) For non-routine non-hazardous wastes that are generated, such as chemical contaminated soil, a blank BASF HAZCOM label must be filled out and placed on the container(s). Information and text necessary to complete the labels. Each unit shall maintain a supply of needed labels.

H. Vendor Containers

(1) Hazard communication labels on incoming containers of hazardous chemicals may be used in lieu of BASF HAZCOM labels as long as the meet the requirements of E (2) above.

I. Pipes and Piping Systems

(1) Site Specifics

Piping Service	Color Combinations
Process Materials	Safety Yellow Background / Black Legend
Not In Service	Safety Purple Background / White Legend
Potable, Cooling, Boiler Feed, and Other Water	Safety Green Background / White Legend
Compressed Air, Instrument Air, Plant Air	Safety Blue Background / White Legend
Nitrogen	Safety White Background / Black Legend
Steam / Condensate	Safety Orange Background / Black Legend
Fire Quenching Fluids	Safety Red Background / White Legend
Para-Process Materials, Glycol Water, and Other	Safety Brown Background / White Legend
*Para-process materials are hazardous materials not in contact with or not a result of process materials.	

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J. Pipes and Piping System continued

1) Pipe Markers For Process Piping

Pipe markers for all lines classified as process piping shall be printed with appropriate Piping Content (consistent with the SDS Safety Data Sheet), line number (if applicable), line origin and destination (TO/FROM) and direction of flow arrow. All color coding and direction of flow arrows shall be integrated into the body of the marker. Information to be printed on each pipe marker for process piping shall be on two lines as defined below:

(i). Line 1: Pipe Contents (Consistent with the SDS) & Flow Arrow
(ii). Line 2: From EQ# to EQ#
(iii). Tag Line: Line Number (if applicable)

2) **Outside Battery Limit (OSBL) Pipe Rack**

(i). Pipe Contents & Flow Arrow
(ii). Owning Department Name (minimum)
Phone Number (suggested)

(2) Pipe size and label/letter sizes

Outside Diameter of Pipe Covering inch (mm)	Length of Color Field inch (mm)	Size of Lettering inch (mm)
¾ to 1 ¼ (19 to 32)	**8 (200)**	**½ (13)**
1 ½ to 2 (38 to 51)	**8 (200)**	**¾ (19)**
2 ½ to 6 (64 to 150)	**12 (300)**	**1 ¼ (32)**
8 to 10 (200 to 250)	**24 (600)**	**2 ½ (64)**
Over 10 (over 250)	**32 (800)**	**3 ½ (89)**

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J. Maintenance and Modifications to Labeled Lines

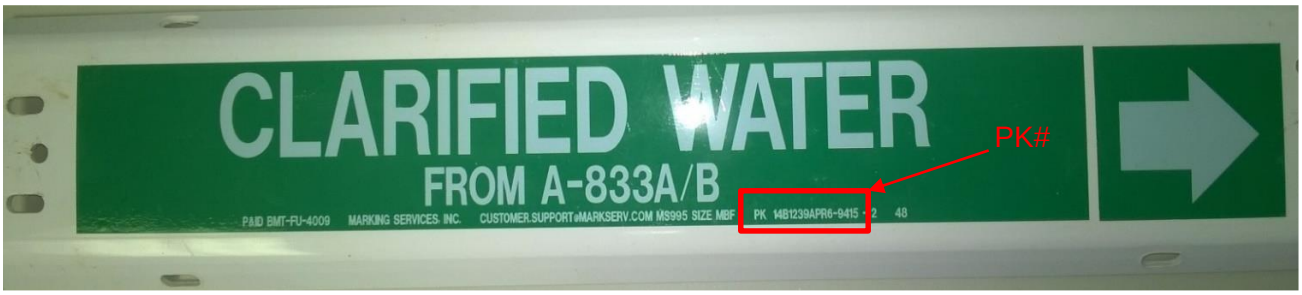
- The following will require an update to the labels tracker related to the line owner; e.g. Dicamba, DMTA, or FFP.
- TES Document control must be notified of any label changes or modifications, so that the related documents may be updated accordingly.
- File Location: B:\GLOBAL\2063-BASUS\BEAUMONT\DOCS\ADM-SOP\Controlled Documents\TES\Line Labeling

(1) Preventative maintenance

1) A PO is existing in SAP to verify labeling per area every six months (e.g. Dicamba Area 100, Dicamba Area 200, etc.)
2) Evaluation of the labeling should be performed using P&ID with marker locations and labeling punch list file located in reference documents of each area (e.g. Dicamba: Reference Documents)
3) Personnel assigned to review the label(s) will verify that the right label is installed in the right piping.
4) Discrepancies will be discussed and verified with operations and create a work order to cover deficiencies.

(2) Corrective maintenance

1) Use damaged label or reference P&ID and punch list in the reference documents to re-order label. When ordering from MSI, you can use the package number (PK#) located in the bottom right of the label. (e.g. see example



2) Maintenance department will plan job for a proper installation. (e.g. Insulators will have banning tools necessary to install the label)

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K. Maintenance and Modifications to Labeled Lines Continued

(3) Modification to Existing Piping

1) The requester or planner will determine the adequacy of the current label to reflect the modification(s) to the piping.
2) The following questions may be used to determine adequacy:
   - Are the contents flowing through the pipe the same as before?
   - Did the source or destination of the contents change?
   - Will the line number change?
   - Other questions may be asked in consideration to the modification(s) made.
3) The line label list for the owning unit must be updated to reflect any modifications.

(4) New Installation

1) During MOC evaluation, any identified new piping will require the requester or planner to modify P&ID with labels and punch list controlled documents for sustainability of the process.
   - The P&ID should indicate the location of the label and the marker identification number.
   - The new marker(s) must be added to the tracker for documentation and record.
2) Refer to Procedure BC032.033 Line Labeling for guidance

4.4. Safety Data Sheets (SDSs)

4.4.1. Location of SDSs

All BASF North America manufacturing facilities shall use 3E Protect to maintain SDS. A SDS for each hazardous substance at a facility will be linked to the corresponding 3E Protect location name(s).

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4.4. Safety Data Sheets (SDSs) Continued

4.4.2. SDS Tracking Procedures

A. Purchasing Department

(1) Purchasing will request that suppliers provide BASF with an SDS with the first shipment of the hazardous material at a minimum, as well as annually or whenever the SDS is updated.

(2) Suppliers will be advised to mail a copy of their SDS directly to the EHS Department.

B. Department Receiving Hazardous Material

(1) Upon receipt of a hazardous material, receiving department personnel shall check the shipment to ensure that an SDS is available with the shipping papers, or that an SDS is on file.

(2) If no SDS is received with chemical shipment or a current SDS is not on file the Chemical shall not be received.

(3) If a current SDS is on file, the SDS will continue with the shipment to its destination on site.

(4) If it is the first shipment of a hazardous material, or if the SDS is an updated version, a copy of the SDS shall be sent to the Health and Safety Department, and one sent with the shipment to it's destination on site.

4.4.3. Health and Safety Department

- The EHS Department will coordinate with the manager of the corporate SDS Database to ensure that all chemicals associated with the site are maintained and updated as needed
- This file will be used for employee, public, customer or regulatory SDS requests.

4.5. Procedures for Handling Hazardous Materials and Performing Non-Routine Tasks

4.5.1. HS Procedures

A. Safe chemical handling procedures are addressed in the HS Procedures, Emergency Response Plan and Operating and Maintenance Procedures. Training on these procedures is conducted for all affected employees.

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4.5. Procedures for Handling Hazardous Materials and Performing Non-Routine Tasks Continued

4.5.2. Non-Routine Tasks

A. The Safe Work Permit Procedure (BMEHS-002.026) addresses the safety precautions required for employees and contractors when performing non-routine tasks. Initial and refresher training is conducted on this procedure.

4.6. Identifying Oxygen Deficient Atmospheres

4.6.1. Examples of activities include, but are not limited to:

A. Loading and/or unloading of bulk containers

B. Integrity/leak testing of bulk containers using nitrogen or other inert gases.

C. Shipping, receiving and/or storage of “empty” inerted bulk containers.

4.6.2. Implementing Hazard Notification Tagging System

A. Implementing a hazard notification tagging system to warn employees and third parties of the presence of an oxygen deficient atmosphere in bulk containers.

B. All bulk containers which contain oxygen deficient atmospheres must be labeled or tagged to ensure proper communication of the hazard (see attachment A)

C. Labels/tags must be securely fastened at the time the nitrogen or other inert gas is introduced into the bulk container

D. Labels/tags must be readily visible at or near the point of entry.

E. Labels/tags and securing devices must be constructed of materials able to withstand applicable environmental conditions.

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4.7. Employee Information and Training

At the time of their initial assignment, and annually thereafter employees shall be trained in accordance with this section.

4.7.1. Required Information

A. Employees shall be informed of:

(1) The requirements of the OSHA Hazard Communication Standard;

(2) Any operations in their work area where hazardous chemicals are present;

(3) The location and availability of the written hazard communication program including the list of hazardous chemicals and SDS files.

(4) Each unit shall maintain Hazcom Information Lists, they list area equipment and the chemicals associated with that equipment. These lists are posted at the entry points into process areas

4.7.2. Training Program Content

The Hazard Communication Training Program addresses the following:

A. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area. These include the use of portable and fixed gas monitors, visual appearance of the material, etc;

B. The physical and health hazards of the chemicals in the work area;

C. The measures employees can take to protect themselves from the hazards posed by the chemicals in the work place. These include the procedures identified in Section 4.4.;

D. The details of this procedure and how employees can obtain and use the appropriate hazard information.

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4.8. Contractor Requirements

4.8.1. Information Requirements Prior to Bid Award

A. Any Beaumont Facility employee who has the authority for Contractor or project bid origination, or for initiating Purchase Requisitions for Contractors to work on the Beaumont facility, has the responsibility to inform the Contractor management of any hazardous chemicals their employees may be exposed to while performing work. This must be completed prior the bid award and before any work has started.

B. Informing the Contractor management of the hazardous chemicals they may be exposed to while performing work will be accomplished by including SDSs for the hazardous chemicals present in the area of the job as part of the initial bid packages.

C. When raw materials for a contractor job are provided by BASF, SDSs will be provided to the contractor management.

4.8.2. Information Requirements Subsequent to Bid Award

The Purchasing Department will inform Contractors awarded BASF bids that they must:

A. Have a copy of their written Hazard Communication Program at the BASF job site.

B. Have a chemical inventory and associated SDSs at the job site for all hazardous chemicals which the Contractor brings on site as needed to complete the job as bid.

C. Ensure that all hazardous chemical containers are labeled with appropriate hazard communication labels.

D. Provide documentation that their employees have been trained in accordance with the OSHA Hazard Communication Standard and have been informed of the hazards associated with the BASF hazardous chemicals in their job area as well as those provided as raw materials by BASF.

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4.8. Contractor Requirements Continued

4.8.3. Information Requirements Prior to Contractor Work

The BASF employee responsible for coordinating the Contractor's work and the person issuing the Safe Work Permit for the Contractor's employees will:

A. Verify that the Contractor has complied with all of the requirements of this Section.

B. Provide the Contractor's employees with information and/or SDSs on hazardous chemicals in the area as requested.

C. Ensure Contractor employees understand alternate labeling systems if used.

D. Ensure Contractor personnel are properly advised of applicable emergency procedures.

5. RESPONSIBILITIES

5.1. Beaumont Facility Leadership Team

Has primary responsibility for implementation of this procedure.

5.2. Environmental, Health, and Safety Manager

Has primary responsibility for the initiation, re-issuance, administration, and/or interpretation of this procedure.

5.3. Beaumont Facility Employees and Contractors

Have primary responsibility for adherence to procedure including identifying deficiencies in the procedure, and identifying, reporting and correcting activities not in compliance with the procedure.

6. Attachments

6.1. Attachment A – Oxygen Deficient Atmosphere Labels

7. REFERENCE DOCUMENTS

G-R-OCH 001: Corporate Health Management

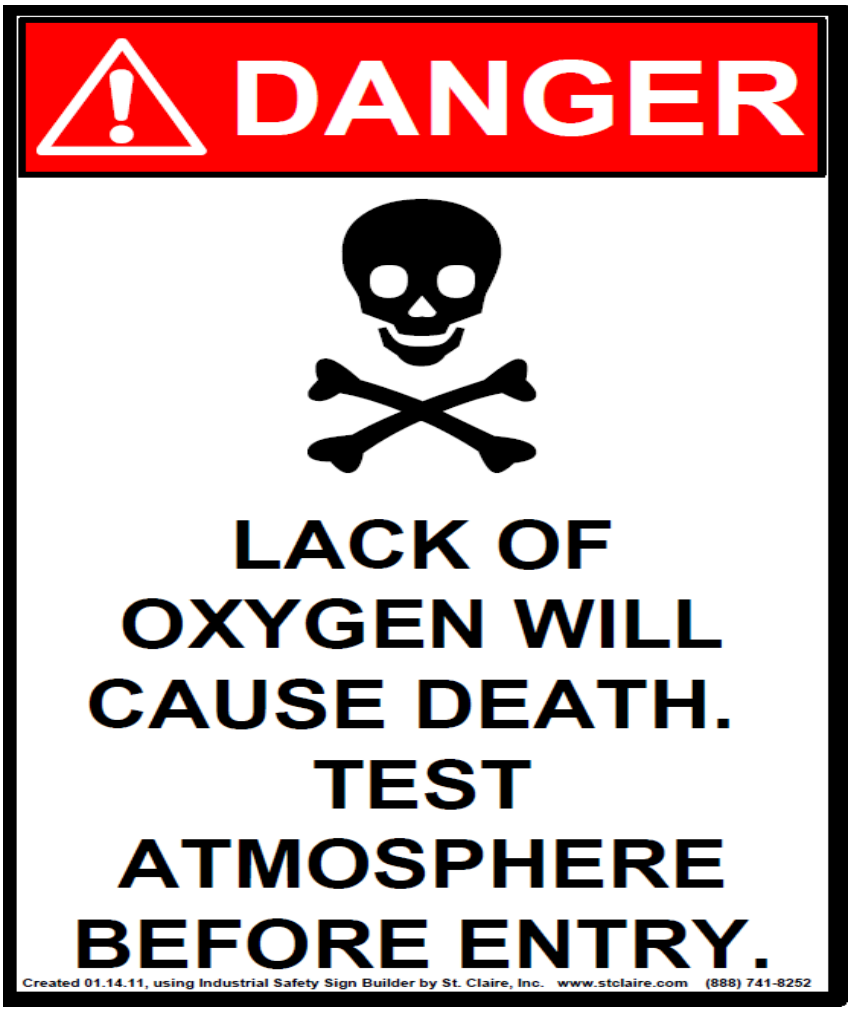
N-ID-OSA 035 | Communication of Chemical Hazards

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Attachment A



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Attachment A



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