PRC-SAF-12

EHS&S Management System

SITE SAFETY POLICIES and PROCEDURES

Tank Car Safety

REVISION # – 1.0
Revision Date – 09/03/13

Revision number reset to 1.0 at transfer into Documentum in January, 2013.
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Revision number reset to 1.0 at transfer into Documentum in January, 2013.
1.0 PURPOSE

1.1 This procedure is to be used as an aid to increase the margin of safety needed to assure a material being loaded, unloaded or shipped by rail is safe for release to the carrier in accordance with all regulations governing the transportation of hazardous chemicals by rail.

2.0 SCOPE

2.1 This procedure will provide the Company’s Zachary Site with techniques to be used to assure that rail shipments are safe for transport and rail car inspections are documented.

3.0 DEFINITIONS

3.1 Bar Wrench: A tool used to secure the enclosures of a tank car prior to release for shipment. A wrench having a handle at least 36 inches long may be substituted.

3.2 Car (Tank or Rail): Any container or tank used to transport commodities or chemicals by rail.

4.0 SAFETY

4.1 All safe work procedures are to be followed when working on or around rail cars.

5.0 SPECIAL EQUIPMENT

5.1 Grounding straps for use when loading and unloading the car;

5.2 Blue flag;

5.3 Wheel Chocks.

6.0 RESPONSIBILITIES

6.1 Management is Responsible for:

6.1.1 Providing support and resources to implement this program.

6.2 Supervision is Responsible for:

6.2.1 Supervisors who have received the proper training are responsible for loading and unloading rail cars within their area of responsibility.

6.2.2 Supervisor shall oversee or carry out activities of trained Operators as defined in Section 6.3.2 Sub-section a., b., c., and d.

Revision number reset to 1.0 at transfer into Documentum in January, 2013.
6.3 **Employee is Responsible for:**

6.3.1 Understanding and complying with this procedure.

6.3.2 Operators who have received the proper training are responsible for loading and unloading rail cars within their area of responsibility.

   a. This individual has the responsibility for assuring that the car is suitable for the service for which it is to be used.

   b. All safety devices and procedures are to be followed for loading and unloading the material, and for assuring that the material is off-loaded into the proper storage tank or that the proper material is loaded into the car.

   c. All items listed on "Inspection Form" *(Attachment 1)* must be checked and meet requirements for shipment.

   d. This individual is responsible for assuring that the proper markings, placards and labels are in place prior to releasing the shipment.

6.3.3 The **Logistics manager** is responsible for contacting the carrier and for providing all required paperwork and placards which apply to each rail shipment.

   a. This individual is also responsible for releasing the cars to the carrier after the required "General Tank Car Inspection" form has been received from the person responsible for loading or unloading the car.

6.4 **Contractor is Responsible for:**

6.4.1 Understanding and complying with this procedure.

6.4.2 Contractors authorized to carry out job functions described in this policy must adhere to all procedures or present a comparable plan approved by the Company’s Zachary Site’s EHS Manager.

6.5 **EHS&S Manager is Responsible for:**

6.5.1 Implementation and execution of this program.
7.0 **PROCEDURE DETAILS**

7.1 **General Safety Precautions -**

7.1.1 Upon receiving a rail car, the "Walk-around Inspection" portion of the “General Tank Car Inspection” form is to be completed.

7.1.2 Hand brakes shall be set and caution signs (blue flags and derailleurs) must be in place prior to any hook-ups for loading and unloading of materials and serve as a warning to human traffic approaching from all sides of the rail car.

   a. These warnings are to be left up until after the car has been disconnected.

   b. All cars shall be electrically grounded to prevent the possibility of sparks.

7.1.3 All connections to be used for loading or unloading shall be securely attached before any valves are opened.

7.1.4 All rail cars shall be attended by the person responsible for loading or unloading while lines remain connected.

7.1.5 All valves and openings must be securely closed and connections must be disconnected should the car need to be left unattended upon the discontinuance of loading or unloading.

7.1.6 All manhole covers, bottom outlet caps, plugs and all other closures including their protective housing shall be closed as if the car were being released for shipment.

7.1.7 Bottom cap and/or the internal discharge valve’s adjacent plug must be tightened using a bar-wrench to assure it is secure prior to releasing full or empty rail cars.

7.1.8 All guards, blue flags, wheel chocks, and derailleurs must be removed and the "Pre-shipment Checklist" on the General Tank Car Inspection form is to be completed and turned in to the Logistic Manager.

7.2 **Tank Car Unloading -**

7.2.1 The "Unloading" portion of the General Tank Car Inspection form is to be completed prior to unloading.

7.2.2 All original markings and placards shall remain in-place even when the car becomes empty.

   a. The only exception to this rule is when the original markings/placards contain incorrect information.

7.3 **Tank Car Loading –**

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7.3.1 Prior to loading the tank car the "Loading" portion of the General Tank Car Inspection form is to be completed.

7.3.2 Before loading, the tank is to be marked with the proper shipping name and placards for the commodity that is to be loaded.

7.3.3 A safety vent (rupture disc) made of a compatible material of construction shall be in place and intact prior to loading. Safety relief devices shall show the date tested and date the next test is due. A car with an outdated safety device shall not be loaded.

7.3.4 When top loading a rail car equipped with a bottom outlet valve, any valve(s) between the internal valve and discharge plug(s) are to be opened and the plug(s) removed while loading. If the internal valve leaks more than a drip (a solid, continuous flow), discontinue loading the car, begin off-loading the material, and notify the Logistic Manager so that appropriate action can be taken to resolve the problem.

8.0 TRAINING

8.1 Operators and Supervisors must receive proper training on loading and unloading of rail cars.

9.0 RECORDKEEPING

9.1 Copies of the General Tank Car Inspection Form shall be maintained in the logistic manager’s office for a period of one year from the date the car is released for shipment.

9.2 Training records shall be maintained in the Safety Manager’s training files for a period of three years following the completion of training

10.0 TABLES

10.1 Reserved for future revision
11.0 ATTACHMENT

Attachment 1 General Tank Car Inspection Form (Typical)

<table>
<thead>
<tr>
<th>ITEM</th>
<th>NA</th>
<th>GOOD</th>
<th>POOR</th>
<th>ITEM</th>
<th>NA</th>
<th>GOOD</th>
<th>POOR</th>
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</thead>
<tbody>
<tr>
<td>PLATFORM/SILLS/WALKWAY</td>
<td></td>
<td></td>
<td></td>
<td>WHEELS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LADDERS</td>
<td></td>
<td></td>
<td></td>
<td>OUTLET VALVES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HAND HOLDS/HAND RAILS</td>
<td></td>
<td></td>
<td></td>
<td>BOTTOM CAPS/PLUGS &amp; CHAINS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TANK BANDS/HOLD DOWN RODS</td>
<td></td>
<td></td>
<td></td>
<td>WASHOUT PLUGS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HAND BRAKES</td>
<td></td>
<td></td>
<td></td>
<td>TANK</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BRAKE HOSES</td>
<td></td>
<td></td>
<td></td>
<td>PLACARD HOLDERS (4)</td>
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</tr>
</tbody>
</table>

DATE OF LAST SAFETY VALVE TEST: ___________  DATE NEXT TEST DUE: ___________

DATE OF LAST TANK TEST: ___________  DATE NEXT TEST DUE: ___________

CAR CAPACITY (Lbs./Kg.) Lt. Wt. (Lbs./Kg)

IF ANY ITEM IS MARKED “POOR”, NOTIFY THE TRANSPORTATION DEPT. BEFORE LOADING/UNLOADING

<table>
<thead>
<tr>
<th>ITEM</th>
<th>Y</th>
<th>N</th>
<th>NA</th>
<th>BY</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAUTION SIGN UP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOP OPERATED BOTTOM VALVE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BOTTOM OUTLET VALVE CLOSED</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>DISCHARGE VALVE OPERABLE</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>DERAIL SET</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WHEELS CHOCKED</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HAND BRAKE SET</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TANK GROUNDED</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

IF EQUIPPED WITH A RUPTURE DISK, CAR MUST BE STAMPED: “NOT FOR FLAMMABLE LIQUIDS”

<table>
<thead>
<tr>
<th>ITEM</th>
<th>Y</th>
<th>N</th>
<th>NA</th>
<th>BY</th>
</tr>
</thead>
<tbody>
<tr>
<td>DISCHARGE VALVE CLOSED &amp; PLUGGED</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PRESSURE TESTED TO 30 PSIG</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PRODUCT I. D. ATTACHED</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PLACARDS INSTALLED#________________</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

RELEASED BY: ________________________ DATE: ___________  TIME: ___________

RETURN THIS COMPLETED FORM TO TRANSPORTATION DEPARTMENT PRIOR TO RELEASING CAR FOR SHIPMENT

Revision number reset to 1.0 at transfer into Documentum in January, 2013.
12.0 REFERENCES

12.1 Title 49, Code of Federal Regulations, 170 - 189


12.3 Document – Historical Data

12.3.1 Origination Date – 05/09/1997; Ferro Document

12.3.2 Revision 1.0 – 05/09/1997; Ferro Document

12.3.3 Revision 2.0 – 02/06/2003; Ferro Document

12.3.4 Revision 3.0 – 07/15/2011; Novolyte Document; Revision made by – Robin Hall

3.0 Revision Notes:

a. Footer and Header changes to include Company logo

b. Contents categorized into the following:

1. Purpose

2. Scope – Added contents

3. Definitions

4. Safety

5. Special Equipment

6. Responsibilities – Added contents

7. Procedure Details – Corrections to errors in grammar

8. Training

9. Record Keeping

10. Tables

11. Attachments

12. References – Added contents

Revision number reset to 1.0 at transfer into Documentum in January, 2013.
c. References to previous ownerships (Ferro, Grant, etc.) removed and replaced with the following Generic phrase: the Company’s Baton Rouge Site, or a similar reference phrase

d. Responsibilities have been categorized into the following (additional responsibility categories will be added as needed):

1. Management responsibilities
2. Supervision responsibilities
3. Employee responsibilities
4. Contractor responsibilities
5. EHS&S Manager responsibilities

12.3.5 Switch to BASF Change to Rev. 1.0 9/3/13