



Alpha Chemical Ltd. Responsible Distribution® Manual

Element 2 Code of Practice - Management of Risk

Each member company shall have an active program designed to continuously improve safety through the reduction of incidents. The protection of people and the environment from hazards is accomplished through hazard reduction, risk analysis, education and the use of personal protective equipment. The Member Company shall:

2.1 *Identify and evaluate, on a regular basis, hazards and associated risks related to the storage and handling of chemicals and chemical products whether on owned or contracted premises*

The Company will review on an annual basis that the hazards and associated risks related to the storage and handling of its products are understood and controlled by its employees and the warehouse operators handling its products. Contract Warehouse Operators will be assessed on a regular basis using CACD's Assessment Documents (See also Code Item Section 7 Suppliers). The OH& Safety Coordinator will maintain full documentation and ensure any corrective actions required are completed.

Procedure(s) Title & No: #4 - Training Program & Recording
 #5 - Contract Warehouse Selection, Evaluation &
 Operation
 #6 - Product Assessment & Introduction

Form (s) No. A 3. Annual Inspection Report
 A 7. Corporate Policy Checklist
 A 5. Personal Training Record
 A 6. Product Introduction & Information Report
 A 10. Contract Warehouse Report
 A.13. Warehouse/Miscellaneous
 ServiceSupplierAssessment& Approved List
 A.14 New Product Warehouse Advice
 A.20 Training Matrix
 A.24 CAR - PAR

Self Assessment Forms: # B 3. Warehouse Operator/Owner Assessment

Other Documents: Information Bulletin # 11 Assessing & Selecting
 Your Public Warehouse

2.2 *Monitor its safety and health performance as well as working environment with the objective of identifying and minimizing actual or potential occupational safety and health problems*

The Company will establish a program to review its safety and health performance, investigating any incidents or near misses that occur and taking the required corrective actions. The company will also conduct a monthly Safety Inspection.



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Procedure(s) Title & No: #7-Accident & Incident Reporting & Review
#8-Customer & Government Audits & Inspections

Form (s) No. A 1. Accident/Incident Report
A 2. Monthly Inspection Report
A 10. Contract Warehouse Report

Self Assessment Forms: # n/a

2.3 Establish written standards for the proper siting of distribution facilities and for the proper ongoing security of these facilities

The Company will maintain records of permits required for operating at their sites and will establish appropriate security arrangements to ensure the integrity of their operation. All records and tests will be documented.

All visitors are required to sign in on entering the facilities and to report out when leaving.

Visitors who enter any part of the facility other than the office are required to be given instruction on emergency warnings and where to assemble in case of an evacuation.

Procedure(s) Title & No: #9-Security
#10-Operating Permits

Form (s) No. A 2. Monthly Inspection Report
A 11 Visitor Sign-In Form

Self Assessment Forms: # n/a

Other Documents: Information Bulletin # 13 Security & Terrorism
Plans D1, 2, 3 & 4

2.4 Establish written standards and procedures for bulk and packaged storage, including: spill containment; proper product segregation; container and container management; packaging and labelling of chemicals and chemical products in liquid, solid or gaseous form; and for vehicles used

The Company will address all aspects of this element appropriate to their operation and will maintain full records of this together with detailed Procedures.

All contracted public warehouses will undergo an evaluation process that includes selection process, self-assessment, reporting and verification visits to confirm their safe operation. This will be reviewed annually or whenever there is a change in any aspect of operation.



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The Company will assess trucking companies to ensure that the safe & licensed vehicles are used to ship their products. (See Code Element 2.6 Carrier Selection) There are no packaged goods which need specific types of vehicles for containment.

The Company will check and advise the Contract Warehouse of the needs and requirements, if required, for labeling product on receipt of new stock.

All Fork Lift Truck Operators will undergo Training according to Provincial Standards and will be retested periodically.

Procedure(s) Title & No: #4-Training Program & Recording
#11-Two-Man Rule
#12-Tank Storage, Lines & Pumps
#13-Spill Containment, Tanks & Facility
#14-Segregation in Storage
#15-Container Management, Testing & Cleaning
#16-Product Packaging & Labeling
#17-Fork Lift Use
#18-Waste Handling & Disposal
#19-Product Quarantine
#26-Transportation Load Compatibility & Security

Form (s) No. A 5. Personal Training Record
A 9. PPE List
A 10 Contract Warehouse Report
A 12. Receipt Advise & Instruction Form
A 16. Release & Shipment Instructions
A 21. Pre-Job Checklist Bulk Transfers/Blending
A 22. Internal Work Order
A 23. Tote Tank Inspection Form
A 25. Fork Lift Truck Operators Daily/Weekly
Inspection Form
A 26. WO Maintenance Record
A 27. Production Batch Sheet

Self Assessment Forms: B 2 Chemical Warehouse Owner/Operator

Other Documents: WHMIS & CEPA Regulations

2.5 Provide employees and contractors with information about the hazards and risks associated with distribution activities, and training in the handling of chemicals and chemical products including, the cleaning of tanks and drums, the proper management of self-generated waste and empty containers; transfer of goods from one container to



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another, including bulk to smaller containers; and, the packaging of chemicals and chemical products

The Company will establish required Procedures and maintain full training records as required by their operations. These records will be reviewed monthly for any required updating.

Procedure(s) Title & No:	#4-Training Program & Recording #11-Two-Man Rule #18-Waste Handling & Disposal #21-Personal Protective Equipment List #22-General, Employee Safety & Information Meetings #23- Safety Shower & Eye Wash
Form (s) No.	A 2. Monthly Inspection A 5. Personal Training Record A 9. Personal Protective Equipment List A 20. Training Matrix
Self Assessment Forms:	B 6 Hazardous Waste Management
Other Documents:	Information Bulletin # 5 Understanding an MSDS (See Code Element 3.1)

2.6 *Establish appropriate criteria for selecting carriers and routes*

As a member company of the Canadian Association of Chemical Distributors (CACD) the Company is committed to work with carriers to ensure the safe handling and transportation of chemical products, so as to minimize adverse effects on human health and well-being, and on the environment.

All carriers must meet the following requirements:

1. The carrier must be a fully registered and insured carrier.
2. The Carrier and Drivers must be qualified to handle the products to be transported.
3. The carrier has undergone ALPHA CHEMICAL's self-assessment and site visit program and was found to meet ALPHA CHEMICAL's requirements (see Appendix)
4. That the vehicle is appropriate and approved to carry the products to be shipped. (Bulk & Packaged Goods)



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Procedure(s) Title & No:	#24-Carrier and Route Selection & Evaluation, #25-Customer Product Pickup #26-Transportation Load Compatibility & Security
Form (s) No.:	A 15. Motor Carrier Assessment & Approved List
Self Assessment Forms:	B 4. CACD's Carrier evaluation
Other Documents:	Information Bulletin # 8 Transportation Emergency Response Guide Information Bulletin #12 Segregating Products in Transportation

Carrier Route Selection requirements:

As part of Carrier evaluation, route selection will be addressed to ensure that chemicals are only transported on commercial routes and, if applicable, Dangerous Goods routes.

Procedure(s) Title & No:	#24-Carrier and Route Selection & Evaluation,
Form (s) No.:	n/a
Self Assessment Forms:	B 4. CACD's Carrier evaluation
Other Documents:	Information Bulletin #8 Transportation Emergency Response Guide

2.7 Audit and update the components of this program on a regular basis

The Company's responsible distribution system will be verified and updated by the Responsible Distribution Coordinator or a third party using appropriate bulletins, manuals and other information from CACD. Information Bulletin #6 "Questions to Consider" will be used as an annual review of the company's operation. It will be used as the basis for the following years evaluation.

The review will include all suppliers including suppliers of services. CACD Assessment program and forms will be used and the results evaluated and results documented.

The review will also address the need to meet or exceed all applicable Laws & Regulations

The report on the review and any recommendations will be submitted to the company president.



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All results will be documented and any required corrective actions will be undertaken and fully recorded.

Procedure(s) Title & No #2- Record Keeping & Corrective Action
#3- Verification of Responsible Distribution
Manual & System

Form (s) No. A 3. Annual Inspection Report
A 17. Quality/Complaint Tracking

A 18. Request for changes to Manuals & Procedures
A 24. CAR/PAR (Corrective Action)

Self Assessment Forms: as applicable

Other Documents: Information Bulletin #6 “Questions to Consider”

2.8 Meet the awareness requirements of the community

The Company will set up a program to become involved in its community, using CACD’s Information Bulletins #7A & B as tools to establish the community.

Membership in a local CAER or similar group will assist in meeting this requirement.

Procedure(s) Title & No: #9-Security
#28-Drills & Exercises

Form (s) No. A 4. Emergency Call Report

Self Assessment Forms: # n/a

Other Documents: Information Bulletin #7A & B

2.9 Maintain an emergency response capability

The Company is committed to Emergency Response Planning and assistance in developing this aspect will be helped by using CACD’s Information Bulletin # 9 & 10.

The Company’s Emergency Response Plan defines the scope and procedures for handling incidents when any of the Company's products at the plant, terminals, during transportation, or at customer’s premises pose a real or potential threat to workers, the environment, or the public.

Transport companies are selected for the quality of their service and their Emergency response capabilities.



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Procedure(s) Title & No: #30-Emergency Response Plan
#30.16-Emergency Response Equipment
#28-Drills & Exercises
#4- Training Program & Recording

Form(s) No. A 2. Monthly Inspection
A 4. Emergency Call Report
A 5. Personal Training Record
A 20. Training Matrix

Other Documents: Information Bulletin # 8 Transportation ER Guide
Information Bulletin # 9 In-House ER Planning
Information Bulletin # 10 Selecting and Verifying
Your ER Contractor

2.10 Provide emergency support related to incidents involving its chemicals, chemical products and services

ALPHA CHEMICAL has contracted its Emergency Response Assistance with Atlantic Industrial Services/Cleaners, but has overall control of this response.

ALPHA CHEMICAL's products are registered with Canutec and with the ER Contractor. They are updated whenever changes occur; this is the responsibility of the Responsible Distribution Coordinator.

Procedure(s) Title & No: #30-Emergency Response Plan
Form(s) No. A 4. Emergency Call Report

Other Documents: Information Bulletin # 8 Transportation ER Guide
Information Bulletin # 9 In-House ER Planning