



Coatings Care®
Overview

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NPCA is a voluntary, nonprofit trade association representing some 400 paint and coatings manufacturers, raw materials suppliers and distributors. As the preeminent organization representing the paint and coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state and local levels.

Introduction

The coatings industry, encompassing paints and printing inks, has long recognized the importance of protecting employee and consumer health and safety, and the environment. The work practices used, the products developed and manufactured, and the support provided to employees, customers and the community stand as examples of a tradition of commitment and concern.

The technological advances achieved by the industry over the past 50 years have resulted in a wide variety of durable, highly visible and long-lasting products, which meet the customer's demand for safety, reliability, and environmental protection. Coatings manufacturers also emphasize environmental protection in new product development, seeking technologies that offer improved product performance along with safety and reduced environmental impact. Thus, awareness of health, safety and environmental requirements has become an integral part of doing business.

As new technologies and product applications emerge in the marketplace, the industry must adapt and respond quickly to effectively support its customers. Regardless of size or products specialty, all companies must effectively integrate health, safety and environmental requirements, while at the same time, implement sound business strategies that will provide for expansion and market growth. Building on this fact, Coatings Care® has been developed as a progressive health, safety and environmental initiative which also recognizes the need to enhance product integrity and quality.

As part of the coatings industry's ongoing commitment to promoting effective health, safety and environmental practices, Coatings Care® offers the industry the means to:

- more effectively use organizational and management resources for compliance with health, safety and environmental regulations;
- integrate consideration of health, safety and environmental resource information in organizational planning and operations;
- enhance participation and direction of association activities;
- access health, safety and environmental management practices and resources being used or considered on an international basis.

Coatings Care® can best be described by detailing how it will support the industry's efforts to manage its health, safety and environmental responsibilities. To this end, Coatings Care® anticipates opportunities for:

- expanding participation in developing health, safety and environmental standards which will govern the industry;
- operating with a uniform health, safety and environmental policy statement;
- adhering to management practices identified or developed by the industry;
- developing community outreach efforts to support public involvement; and
- identifying and evaluating areas for improvement.

Coatings Care® offers participating member companies the opportunity to pursue a common, effective management approach for their health, safety and environmental programs. In addition, participation in Coatings Care® provides a visible commitment by all levels of management to follow established practices and published policies, to account for implementation, and provide sufficient resources to assure program effectiveness.

In today's marketplace, diverse and often conflicting requirements for protecting worker health, safety and the environment may lead companies to pursue unfocused and overlapping management strategies. Participation in Coatings Care® will allow companies to address their health, safety and environmental responsibilities through a consistent set of management practices. Coatings Care® also offers the opportunity to apply this program on an international basis throughout the global marketplace.

An additional feature of Coatings Care® is that it is supportive and complementary to the Responsible Care® program of the chemical industry, and the Responsible Distribution® program for chemical distributors. Thus, companies who fulfill a commitment to Responsible Care®, or Responsible Distribution® are acknowledged as having met all the requirements of Coatings Care®.

Participation

Whether measured in terms of expanded or shared resources, improved communications, or enhanced industry performance with respect to health, safety and environmental measures — participation in Coatings Care® is vital to its success.

The real benefits of Coatings Care® have become evident as organizations make a commitment to the program as part of their membership in NPCA. Once the commitment is made, member companies are encouraged to consider ways to adopt the Coatings Care® program. First and foremost, adopting Coatings Care® requires the firm commitment of top management. Successful implementation of the management practices identified in the program can be accomplished in a number of ways:

- By acknowledging the benefits of adopting a management program consistent with the Coatings Care® policy statement
- By participating in the Responsible Care® or Responsible Distribution®
- By establishing an internally operated management program that is substantially equivalent to and consistent with Coatings Care®
- By determining, after careful review and assessment, that because of the nature of your business Coatings Care® is not applicable

NPCA plans to continue to develop Coatings Care® to reflect the coatings industry's commitment to individual and collective programs to promote sound health, safety and environmental practices. As the program matures and adjusts to industry needs, it is acknowledged that individual company approaches to implementation will be re-evaluated and amended as necessary.

Policy Statement

NPCA member companies will implement a Coatings Care® program in an effort to protect worker and community health and safety, as well as the environment. Such a program shall:

- Promote efforts to protect employees, customers, and the public and the environment;
- Provide relevant information on the safe use and disposal of industry products to customers, and make such information available to the public on request;
- Make protection of health, safety, and the environment an early and integral part of the organizational planning process;
- Comply with all legal requirements which affect operations and products;
- Be responsive to community concerns;
- Assist governments in the development of equitable and attainable standards.

Codes of Management Practices

Coatings Care® will establish Codes of Management Practices in five critical areas of health, safety and environmental responsibility:

Transportation and Distribution

- Training
- Risk Management
- Carrier Performance
- Distributors
- Emergency Response

Product Stewardship

- Product Development
- Health, Safety and Environmental Education and Information
- Product Safety (Product Use)

Manufacturing Management

- Occupational Safety and Health
- Operations (Process Safety)
- Environmental Management (Pollution Prevention/Waste Management)

Community Responsibility

- Emergency Response
- Employee Education and Training
- Community Liaison

Security

Evaluation and Improvement

For each area of responsibility, Coatings Care® defines specific management practices that address appropriate health, safety and environmental considerations for coatings manufacturers. In addition to defining these management practices, Coatings Care® allows for the establishment of systems for continuous self-evaluation, implementation and improvement to guide individual company efforts.

Self-Evaluation Checklist Tool

A self-evaluation checklist has been developed by NPCA to assist participating member companies in their implementation of the Coatings Care® management practices. Every code of management practice has a checklist that may be used to assess current operations or identify areas for future action. Participants are encouraged to use these self-evaluation checklists in a manner appropriate for their operations. Levels of implementation to be considered include:

- I. Awareness — General knowledge of management practice, but formal program not established.
- II. Developmental — Evaluating facility's program to determine consistency with management practice.
- III. Operational — Facility program consistent with management practice.
- IV. Re-evaluating — Operational program being continuously re-evaluated for possible improvements in management practice.
- N/A Not Applicable — Management practice not relevant to current operations.

Companies are encouraged to rank their own performance, justify that ranking internally, determine where they want company performance to be at the next review, and outline plans to improve.

Transportation and Distribution Code Overview

I. Purpose

The Transportation and Distribution Code under Coatings Care® seeks to ensure the safe shipping of coatings products to the industry's customers, and to reinforce the integral role of health, safety and environmental considerations in the distribution chain.

Transportation and distribution practices for coatings products are extremely diverse and highly regulated. This code addresses hazardous material transportation requirements, including those applying to containers and packaging, marking, placarding, and carrier selection. Storage and warehousing restrictions associated with hazardous material regulations, fire codes and use permits are also considered.

Given the diversity of the industry's products and shipping practices, the Transportation and Distribution Code is intended to reflect good management practices. As a result, implementation of the code will integrate practical and flexible considerations for all NPCA members.

II. Management Practices

An individual company's implementation of the Transportation and Distribution Code of Coatings Care® will require a visible commitment by all levels of management through published policies, accountability for implementation, and provision of sufficient resources. Each NPCA member should establish an ongoing transportation and distribution program, which at a minimum, addresses the following management practices.

Coatings Care® Transportation and Distribution Code Management Practices Summary

TRAINING

TRAINING TRANSPORTATION AND DISTRIBUTION EMPLOYEES (1.1)

Establish a verification program to ensure that employees and contractors involved in transportation and distribution are trained to understand and comply with applicable procedures and regulatory requirements

Employee safety as well as the prevention of accidents during transportation and distribution activities is of primary concern for the paint and coatings industry. Additionally, the performance of some products is dependent on them being properly handled through the transportation process, and of course, the timely delivery of products to customers is of importance too. These are all factors that should be considered for training transportation and distribution employees.

To meet business objectives and to assure the safety and health of workers, communities and the environment, the establishment of an effective training program for transportation and distribution employees is necessary. This management practice describes the steps necessary to establish a training program for transportation employees and contractors, and includes a verification program to be sure training is effective. Activities that need to be addressed during the establishment of the training program include: hazardous components of the products; loading and unloading procedures; handling considerations; spill

prevention and control measures; and compliance with regulatory requirements. Items that should be evaluated during the verification process include training records and materials, and required certifications.

Useful content:

- Required DOT Training
- Required OSHA Training
- Employee Training Matrix – Requirements by Job Function
- Employee Training Matrix – Requirements by Responsibility
- Employee Record keeping Assessment Checklist for Verification of DOT Training

MAINTAINING REGULATORY COMPLIANCE (1.2)

Maintain copies of all applicable regulations and internal compliance procedures

The distribution of paints and coatings is governed by a wide range of domestic and international regulations. These regulations are constantly changing. Implementation of this management practice will not ensure compliance with all the regulations; however, it establishes a system to help you stay current with the regulations that impact your business. When dealing with paint and coating products, a facility should have in place a process to monitor changes and interpretations of new and existing regulations. This process does not have to be elaborate, but must be applied consistently to be of value.

Useful content:

- US Department of Transportation Regulatory Information Resources
- United Nations Information Resources on the Transport of Dangerous Goods
- The International Maritime Dangerous Goods Code/Ordering Information
- International Civil Aviation Organization Technical Instructions (ICAO) and International Air Transport Association (IATA)/Ordering
- Information Concerning the International Carriage of Dangerous Goods by Rail (RID) and European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR)/Ordering Information
- Mexican Hazardous Materials Regulations/Ordering Information
- Canadian Transportation of Dangerous Goods (TDG) Regulations/Ordering Information

DEVELOPING WRITTEN POLICIES AND PROCEDURES (1.3)

Develop written policies and procedures relevant to the transportation and distribution of coatings products, intermediates and waste

Documented policies and procedures for doing transportation and distribution activities can be important tools especially when used to reinforce or even enhance a training program. The effort to document policies and procedures can also be used to establish a baseline or minimum level of performance for employees.

For example, an organization can show its top management commitment to its transportation and distribution training program by establishing a formal company employee training policy. Another example would be for the development of a company-specific requirement for the handling of a particular product that conforms to regulatory requirements or an industry consensus standard. It is important that such requirements be broadly communicated to all the workers who may handle the product. The issuance of a company procedure for handling this particular product will reinforce any specific training provided.

Useful content:

- How to Develop a Policy Statement

CONTINUOUS IMPROVEMENT IN TRANSPORTATION AND DISTRIBUTION TRAINING (1.4)

Establish policies and procedures which allow for continuous improvement of transportation and distribution safety

Employers need to periodically evaluate their training programs to see if the necessary skills, knowledge, and routines are properly understood and implemented by their trained employees. All training programs should have, as one of their critical components, a method for measuring effectiveness, and this method should be developed at the same time as the training program.

Periodic evaluation of a training program will help employers determine the amount of training their employees understood, and whether the desired results were obtained. If, after the evaluation, it appears that the trained employees are not at the level of knowledge and skill that was expected, the employer will need to revise the training program, provide retraining, or provide more frequent refresher training until the deficiency is resolved. Those who conducted the training and those who receive the training should also be consulted as to how best to improve the training process.

Useful content:

- Suggested Review Questions for Job Training Evaluation

RISK MANAGEMENT

SELECTION OF PRODUCT DISTRIBUTION FACILITIES (2.1)

Establish a written policy for the selection of product distribution facilities

Paint and coatings products are distributed in a variety of ways using internal resources (company personnel and facilities) as well as external (contractor personnel and facilities). Whether a company chooses to establish a captive distribution network (company operated and staffed) or uses contractors to undertake any or all of the distribution functions, it is important to identify and establish the criteria for selecting distribution facilities that meet the health, safety and environmental goals of Coatings Care[®].

Reducing these goals to a written document helps to ensure uniform application of the policy. This management practice offers an example of a written policy for selecting distribution facilities. The policy also contains specific procedural steps that can be used for the selection of new distributors. Keep in mind that this offers just one example -- your company may have different needs or concerns based upon specific manufacturing practices or production. The important point is to establish the minimum selection criteria which adequately address the health, safety and environmental concerns attendant to your company's processes and products, and then, apply those selection criteria uniformly.

This management practice is intended to develop decision-making criteria from existing facility practices and essential health, safety and environmental considerations embodied in regulatory obligations. It is important to stress that this management practice seeks solely to provide guidance for use in making selection decisions and is not intended to direct specific business practices.

Useful content:

- Sample Policy and Procedures for Selection of Distribution Facilities

SECURITY AT DISTRIBUTION SITES (2.2)

Develop procedures that provide for an adequate level of security at distribution sites

Maintaining an appropriate level of security for transportation and distribution sites is a key consideration for managers. The physical boundaries of a facility, which include the perimeter of the property on which the facility is located and the walls of the buildings, are the most obvious starting points when evaluating security. Remember that site security has dual functions; the physical borders must not only keep unauthorized personnel out of the facility but also be designed in such a way to permit the safe and efficient entry of authorized persons and transport vehicles carrying hazardous materials.

Resources in the guidance for this management practice offer a list of suggested questions to consider when attempting to evaluate the needs of your company with regard to public access to the property and the facilities. These questions are designed to help Coatings Care[®] companies focus on the appropriate level of security that is warranted. If security is provided by a contractor, the contractor must be made aware of the hazardous materials used onsite and the appropriate emergency response procedures to be initiated in case of an incident on their watch.

It is critical to companies implementing Coatings Care[®] to understand that there are potential hazards associated with the products moving through their distribution facilities and that a comprehensive program designed to assure security can greatly diminish some of those potential hazards.

Useful content:

- Factors to Consider Regarding Security Policies and Procedures
- Sample Policy and Procedures for Closing and Lock-up

TRANSPORTATION AND DISTRIBUTION HAZARDS, COMMUNITY AND ENVIRONMENTAL RISKS (2.3)

Identify and evaluate, on a regular basis, potential hazards and associated risks to the community and the environment relative to transportation and distribution of coatings products

Transportation and distribution incidents can occur wherever and whenever you move products. The underlying cause of many of these incidents oftentimes is not under the direct control of the manufacturer, distributor or transporter. Proper training of personnel may minimize the likelihood of an incident, but can never eliminate all foreseeable causes. It is critical for companies implementing this management practice to begin to recognize, evaluate and control the risk of transportation and distribution incidents as a means of minimizing potential adverse health or environmental consequences. To do this it is necessary to understand: (1) the potential hazards associated with new and existing products being shipped; (2) the likelihood of accidents or incidents involving the product's transportation and distribution which could result in a release to the environment; and (3) the potential impact of such releases.

Effective management of health and environmental risks can be achieved by having company personnel and contractors responsible for transportation and distribution develop an understanding of the product's potential hazards. DOT regulations define hazardous materials for shipping purposes, OSHA regulations define hazardous materials for workplace hazard control, and EPA regulations define hazardous materials for

environmental control. The challenge associated with implementing this management practice is for your organization to adopt a consistent approach to ranking product hazards.

Developing some sense of the likelihood and severity of a transportation and distribution incident requires a detailed understanding of how products (of a given hazard) are to be shipped. For example, the likelihood of a motor freight incident increases with the volume of shipments, the number of trips, and the route distance. The severity of any incident can initially be characterized as one involving a “release” to the environment or one in which the product remains contained. Incidents involving releases need to be characterized in terms of their severity, first by size (ranging from small spills to the loss of the entire contents of a tank car) and second by the potential environmental impact, a ranking which must also take into account the potential hazard of the product.

Useful content:

- Categories of Information for Undertaking Periodic Risk Evaluations of Transportation and Distribution Activities
- Transportation and Distribution Activities –Risk Evaluations

PERFORMANCE MONITORING (2.4)

Develop procedures to monitor company performance in transportation and distribution activities, and use such information to prevent future incidents

The risks associated with transporting and distributing paint and paint-related materials illustrates that an internal system of recording and investigating accidents/incidents is important. Although every effort should be made to avoid and prevent the occurrence of such incidents, if one does occur, Coatings Care[®] companies should use the experience to reevaluate policies and supporting procedures in the hope of reducing the risk of similar incidences in the future.

All transportation and distribution incidents should be thoroughly investigated. The investigation documentation should include questions regarding the package selection and preparation. In addition, questions regarding the handling and storage of the materials involved in the incident should also be answered. It may be helpful to trace the movement of the materials in question from the time they entered the transportation arena until the time of the incident. The goal is to gather appropriate data related to the incident, determine the probable cause, and then examine whether different or modified handling, storage, preparation, or container selection procedures could reduce the probability of a future similar incident.

Coatings Care[®] companies should be committed to continuously re-evaluating performance in all transportation and distribution activities so as to minimize the risk of future incidents. Therefore, a company’s daily operating procedures should include, where applicable, an evaluation of the performance of carriers and distribution centers, as well as a company’s own storage and handling and preparation functions. This should be done every day, not merely when there has been some type of incident. Additional guidance assists Coatings Care[®] companies in assessing the performance of their carriers, and provides selecting criteria for distribution centers. Coatings Care[®] companies, are also directed to address internal transportation and distribution functions such as storage and handling, container failure, container selection and container preparation.

Useful content:

- Sample Transportation and Distribution Incident Information Form
- Sample Data Collection Forms for Claims Analysis
- Sample Procedure for Transportation and Distribution Performance Monitoring

CONTAINER MANAGEMENT PROGRAM (2.5)

Develop a written procedure to address selection, use and management of containers that are suitable for their intended purpose

This management practice covers a wide range of packaging activities. “Selection, use and management of containers” means gathering the necessary data to choose a package that is appropriate for the product being shipped, one that complies with appropriate performance standards and certification requirements, and is free of leaks and visible defects. This is a significant task and one that is highly regulated by the Department of Transportation’s Research and Special Programs Administration for hazardous materials. Diligent attention to details on the materials you transport and fastidious adherence to the applicable regulations are necessary to assure compliance and a safe, efficient transport. Once the package has been selected in accordance with the principles of this management practice, you are ready to fill the package and send it into the distribution cycle where it can be properly marked, labeled, placarded, and stored (as appropriate).

Several sections in the Code of Federal Regulations (CFR) govern package selection, use and management. The type of package selected will depend upon many different factors, including the quantity of material being shipped, the hazardous nature and class of the material, and the method of shipment. The guidance in this management practice helps to “decipher” the applicable 49 CFR regulations for package selection.

Uniform and consistent application of these practices will ensure the greatest degree of protection for the material in transport and throughout distribution. It is critical for Coatings Care[®] companies to implement practices and procedures which will ensure the greatest degree of protection not only for the material in transportation but for the facility environment and the community at large.

Useful content:

- Transportation Instructions for Finished Goods
- How To Package Hazardous Materials (49 C.F.R. Parts 173 and 178)

STORAGE, SEGREGATION, PACKAGING AND MARKING (2.6)

Establish written procedures for the storage, segregation, packaging, and marking of coatings products

This management practice is designed to address specific activities that must be completed after a container or package is filled. Whether the package is prepared for shipment or placed into storage, there are specific actions that can be taken to ensure the package is properly handled and to achieve the greatest degree of safety. Although this management practice specifically refers to storage, segregation, packaging, and marking, it also includes additional activities -- such as labeling and placarding.

Just as package selection, use and management is highly regulated, so to are storage, segregation, packaging and marking activities. Several sections of 49 CFR address the storage, segregation, handling, marking, labeling and placarding of filled packages and containers. Practically speaking, a simple system which automatically identifies the relevant product classification and hazard information and produces the instructions for marking, labeling and placarding is the goal of this management practice.

Coatings Care[®] companies should be firmly committed to transporting products in a safe and efficient manner. While compliance with prior management practices will help ensure proper package selection and management, these efforts will be in vain unless the proper storage, segregation, marking, labeling and

placarding procedures are also instituted. This comprehensive approach to transporting goods will help your company achieve the health, safety, and environmental goals of Coatings Care[®].

Useful content:

- US DOT Marking/Labeling/Placarding Requirements (49 C.F.R. Part 172, Subpart D)
- Transportation Instructions for Finished Goods

CARRIER PERFORMANCE

SELECTION OF CARRIERS (3.1)

Establish a policy and procedures for selecting carriers which consider safety performance, inspections and maintenance, and training of support staff

Carriers, the transport vehicles that physically move products from one location to another, are the heart and soul of the distribution network. Manufacturers of products must be aware that the distribution network is its link to the ultimate consumer. As such, manufacturers must assure that the distribution network acts responsibly with regard to health, safety and environmental considerations.

Carrier safety records, fleet inspection and maintenance, and the training of staff are all factors which contribute to overall performance. These factors can and should play a role in the selection process. For instance, manufacturers can easily review a carrier's safety performance by asking for a copy of its Department of Transportation Federal Highway Administration safety rating. The actions necessary to obtain this kind of information should be incorporated into a written policy and procedures.

This management practice is intended to assist manufacturers by developing decision-making criteria from existing facility practices and essential health, safety and environmental considerations embodied in regulatory obligations. It is important to stress that this management practice seeks solely to provide guidance for use in making carrier selection decisions. It is not intended to force a specific business practice.

Useful content:

- Elements to Consider When Evaluating a Carrier's Overall Safety Performance
- Sample Policy and Procedures for Selection of Carriers
- How to Obtain a Motor Carrier's DOT/FHWA Safety Rating

CARRIER COMPLIANCE AND INSURANCE REQUIREMENTS (3.2)

Develop written procedures which require carriers to be properly insured and have all required government permits

Government permits help ensure that carriers comply with minimum health, safety and environmental concerns. Minimum insurance requirements give the shipper or consignee the added comfort of knowing that the carrier has sufficient financial means to make amends should an incident occur. Both of these factors are vital in maintaining a carrier network that adheres to the goals of Coatings Care[®]

This management practice offers a sample carrier selection policy that incorporates insurance requirements and financial status of the carrier as key elements. This policy requires that carriers submit copies of insurance policies with expiration dates in addition to certain critical financial information. While this policy also takes into consideration additional factors, keep in mind that your company may not require the same kind of information -- each company will have its own specific needs to consider.

Useful content:

- Sample Policy and Procedures for Insurance Verification

DISTRIBUTORS

DISTRIBUTOR EDUCATION (4.1)

Encourage and assist distributors in educating their employees on the safe storage and transportation of coatings products

Facilities that store and handle paint and paint-related materials are an integral part of the transportation and distribution network which moves coatings products to the ultimate consumer. Every juncture along the way to the ultimate consumer has the potential to become the site of a hazardous materials incident. The risk of an incident is dramatically increased if distribution facilities do not train their employees adequately.

As handlers of hazardous materials, employees in distribution facilities require specific training in order to comply with the applicable federal, state and local regulations. Although such training is the responsibility of the distributor, a manufacturer of hazardous materials can and should offer its expertise in endeavors that will directly minimize the potential for an adverse incident involving their products, at any point in the distribution network.

This practice is designed to ensure that critical information and effective methods of training hazardous materials employees known to the manufacturers are also made available to distribution facilities. It is not intended to place additional training responsibilities on the manufacturer, but rather is designed to establish and maintain a communications network that extends from the manufacturer to its distributors, whether they are in-house or contract facilities.

Useful content:

- Sample Letter to Distributors Regarding Availability of Training Materials

DISTRIBUTORS—INFORMATION REQUESTS (4.2)

Develop a procedure for responding to requests for information or assistance at any point in the distribution chain

Timely and efficient communication between distribution facilities and the manufacturer is an important factor in the safe storage and transport of paint and paint-related materials, many of which are hazardous. In order to operate in a safe and efficient manner, handlers of these materials, whether they are housed in contract facilities or in-house distribution facilities, must have access to the best and the most accurate data that is available.

When products are in the distribution chain, a timely and accurate response to a request for information about products or materials can assist in the safe storage and handling of the materials and minimize the adverse impact of an incident. Remember, the distribution chain encompasses a wide variety of handlers, and some may not be knowledgeable about the potentially hazardous nature of paints and related materials. Having a formal procedure for responding to such requests provides immediate access to such information for all handlers.

This management practice is designed to help Coatings Care[®] companies develop and implement a formal procedure for responding to requests for information about materials and products, whether the request is from a contract distributor or a retail store that sells to painting and decorating contractors.

Useful content:

- Sample Policy and Procedures for Information Requests
- Sample Form for Recording Product Inquiries

EMERGENCY RESPONSE

EMERGENCY RESPONSE PLANNING (5.1)

Develop and maintain a transportation emergency response plan

Paint and coatings manufacturers need to be prepared to provide practical and technical information in the event of a transportation accident or emergency involving their products. The very minimum level of response requires that all companies have the ability to get a Material Safety Data Sheet (MSDS) to the scene of an accident at any time of day or night. Therefore, it is important to develop an organized approach which involves your own company as well as representatives from the commercial carriers you are using to transport your products. The carrier will provide the initial response when involved in a transportation incident. Their knowledge and understanding and your ability to provide the relevant information about your products, raw materials or finished goods, is essential for controlling risks.

This management practice focuses on developing a Transportation Emergency Response Plan, a coordinated response which outlines appropriate and required activities for your company to undertake. Because the circumstances of hazardous materials incidents varies widely, it is impossible to establish strict guidelines. Rather, it is the goal of this management practice to prepare companies to engage in specific response activities immediately so as to initiate the appropriate rescue and containment efforts in every case, regardless of the nature of the released element. Community leaders that understand the paint industry, its products, and its approach to transportation emergency response will be better able to deal with an incident.

Useful content:

- Overview of Emergency Response Information Requirements
- Release Reporting Requirements
- Elements/Activities for a Transportation Emergency Response Plan
- Sample Information Gathering/Tracking Form
- Sample Spill/Accident Report

LOCAL EMERGENCY RESPONSE SUPPORT (5.2)

Establish procedures to provide support to local emergency response personnel in the event of a transportation incident

Paint and coatings shippers should be prepared to provide technical advice to emergency response agencies in the event of an accident or emergency involving their products. This management practice requires that the emergency response information is accessible to emergency responders in the event of an incident or accident. Coatings Care[®] companies recognize that this information must be available in advance of an incident for planning purposes, as well as readily available at the time of an incident.

In addition, a dialogue with the public should be established and maintained. One thing is certain, a community that has been briefed and engaged in dialog with paint and coatings manufacturers and shippers will have a better understanding of the requirements for any incident response and mitigation effort. Although this management practice discusses media relations, most of the community outreach efforts associated with emergency response will be developed in the Community Responsibility Code of Coatings Care[®].

Useful content:

- Sample Procedures (Communication with Emergency Response Personnel)
- Media Relations in the Event of a Crisis
- Example of How To Prepare For Media Calls

Product Stewardship Code Overview

I. Purpose

The Product Stewardship Code under Coatings Care[®] seeks to establish health, safety and environmental (HSE) considerations as an early and integral part of product formulation and to communicate appropriate safeguards for product use and disposal to customers. To accomplish this, product stewardship must be viewed as a shared responsibility and therefore understood by all those responsible for product formulation, manufacturing, marketing and customer support.

Product stewardship principles apply for all classes of industry products, and acknowledge the need for quality products which can be used and disposed of safely. In the workplace, product stewardship efforts support the employer's responsibility for providing a safe workplace and addressing environmental considerations arising from product use and disposal.

Given the diversity of the coatings industry, the Product Stewardship Code is intended to reflect good management practices applicable to all companies, and effective implementation will integrate practical and flexible considerations of value to all participating NPCA member companies.

II. Management Practices

An individual company's implementation of the Product Stewardship Code of Coatings Care[®] will require a visible commitment by all levels of management through published policies, accountability for implementation, and provision of sufficient resources.

Coatings Care[®] Product Stewardship Code Management Practices Summary

PRODUCT DEVELOPMENT

HEALTH, SAFETY & ENVIRONMENTAL RISKS (1.1)

Develop procedures to identify and reduce potential health, safety and environmental risks associated with new and existing products; evaluate risks and implement or communicate appropriate control practices for safe use and disposal

It is the responsibility of the manufacturer to systematically gather, interpret and act on information regarding potential health, safety and environmental risks that may be posed by new or existing products. Typical sources of such information would include MSDSs from raw material suppliers, publicly available health and safety databases, government regulations (e.g., OSHA regulations, TSCA 5(e) Consent Orders, etc.), and internal company databases (e.g., TSCA 8(c) files, toxicity studies in the manufacturer's possession, logs of customer complaints, litigation files, etc.). When insufficient information exists, the manufacturer might consider generating information by such means as toxicity testing, environmental fate studies, or exposure assessments.

Review and assessment of this information is most effectively accomplished by employees who are equipped by training and experience to appreciate its significance, arrive at sound risk characterizations, and develop effective risk management strategies. Examples of effective risk management strategies would include label

and MSDS warnings, personal protective equipment recommendations, and disposal instructions. In some cases the risk management strategy may include reformulation of the product to use less toxic components, or restricting distribution to markets where industrial hygiene practices are known to be adequate.

Useful content:

- OSHA Hazard Communication Standard (1910.1200) - Hazard Determination
- CMA-Product Risk Management Strategy Overview

DESIGN INTEGRATION (1.2)

Integrate health, safety and environmental considerations into the design, development and improvement of products and processes, including a commitment to conserve, where possible, natural resources and energy

The manufacturer should have management systems in place to assure that health, safety, and environmental (HSE) considerations are reviewed as products move through the development process. These considerations should be given equal weight to such factors as product performance, cost, market acceptability, etc. in new product release decisions.

In conducting this assessment, the manufacturer may want to consider such tools as life cycle assessment (LCA). Factors to be considered may include not only those HSE considerations associated with product manufacture and use, but also such factors as packaging waste, energy consumption, the sustainable use of renewable and non-renewable resources, recycling and reuse opportunities.

New products should not be launched until a determination is made that it is possible to make, use, handle, distribute, recycle, reuse and dispose of the product safely and in an environmentally sound manner.

Useful content:

- Principles of Product Stewardship (for Training Programs)

RESPONSE TO CUSTOMERS AND FIELD PERSONNEL (1.3)

Establish procedures to address information received from customers and field personnel. Such information should be evaluated and used in product development efforts

The manufacturer should provide adequate training on product stewardship to employees with responsibility for customer contact, and also provide these employees with access to resources needed to respond to customers.

Moreover, there should be a defined communication system in place to ensure information received from the customer is passed on to others within the manufacturer's organization with the training and experience to evaluate its broader significance. Immediate review of this information needs to be considered re: TSCA 8(e) reportability or 8(c) recordability, OSHA, CPSC, and product liability implications. This information should be compiled and retained to help guide ongoing company product stewardship efforts, such as product development, customer outreach, and business plans for existing products.

Useful content:

- Customer Inquiry Flowchart

CONTRACTOR SELECTION (1.4)

Select and use contract manufacturers who follow appropriate health, safety and environmental control practices

The selection of contract manufacturers should be performed in accordance with the current accepted standards within the company. Contract manufacturers include toll, custom converter, and private label. The contract manufacturer should be held to the same or similar standards as the company is held for its own operations. It is advisable to require either a safety/environmental review prior to operation or a certification that the contract manufacturer adheres to the same standards that the company does. These standards may include participation in Coatings Care® or some other similar program. Guidance is provided on how "Contract Manufacturers" might be defined and the level of involvement a manufacturer might be able to pursue based on the various types of contractors.

It is important to develop principles defining acceptable health, safety and environmental performance for contractors, and these principles should be communicated to current and prospective contractors as a condition of doing business with the manufacturer. For contractor relationships that require greater scrutiny, practices at the contractor's site should be reviewed by the manufacturer to assure they are in conformity with these principles. In some instances, joint training programs with the contractor may be required to ensure that an adequate standard of performance is met.

In addition to the initial evaluation of contractor practices versus these standards, the manufacturer may consider periodic reviews of the contractor's facilities, third party certification of contractor performance, or other measures that would provide objective metrics of contractor HSE performance.

Useful content:

- Contractor Definitions
- HSE Requirements for Contractors
- Use of Off-Site Contractors

HEALTH, SAFETY AND ENVIRONMENTAL EDUCATION/INFORMATION

HEALTH, SAFETY AND ENVIRONMENTAL (HSE) INFORMATION FOR CUSTOMERS (2.1)

Develop and distribute product labels and Material Safety Data Sheets (MSDSs) which convey appropriate hazard warnings as well as conditions for safe use and disposal

Manufacturers, as the creator of products, are, in many cases, the most knowledgeable resource about a product's characteristics. As such, the responsibility to inform and warn users about the health, safety, and environmental implications of its products, whether they are experimental products or isolated intermediates, falls logically upon the shoulders of the manufacturer. This responsibility is defined by laws and regulations along with everyday business practices. This document seeks to provide some background and explanation of this management practice along with suggested activities for designing the mechanisms to ensure its implementation.

There are many methods of communicating information to internal and external consumers. Some methods are required by law in the form of labels or Material Safety Data Sheets (MSDS) while other forms are not mandated but have been developed by the manufacturer/industry in order to update technical information.

Other methods include but are not limited to:

- product labels;
- Material Safety Data Sheets;
- product (or technical) data sheets;
- additional informational pamphlets;
- electronic bulletins or correspondence;
- technical assistance documents and communications; and
- training seminars.

Special attention must be given to any change in the process, which includes changes to equipment, the formula, the software programming or the use of new raw materials. These types of fundamental changes, even if they are subtle in nature, could have a dramatic consequences and it is vitally important that significant changes or updates be promptly communicated to customers. An effective “management of change” policy could be very beneficial.

A manufacturer with a commitment to product stewardship strives to adequately and properly distribute appropriate health, safety and environmental information regarding its products in a timely fashion. This effort seeks to ensure that the customer has appropriate information on the proper product use, handling, and disposal readily available. A manufacturer committed to Coatings Care® will look at not only the required regulatory information but will consider other relevant data as well.

Useful content:

- Product Stewardship Customer Card (for use in telephone inquiries)
- Sample Customer Letter – Coatings Care® commitment
- Sample Customer Letter – MSDS and Supplier Notification

SUPPLIER HEALTH, SAFETY AND ENVIRONMENTAL (HSE) INFORMATION (2.2)

Require suppliers to provide appropriate health, safety, and environmental information on their products

Federal law requires manufacturers to obtain specific information from suppliers. Suppliers include raw material manufacturers, distributors of raw materials, and all types of contract manufacturers.

Since companies must consider the health, safety and environmental risks for all components of a product, companies need to ensure that suppliers provide adequate health, safety and environmental information for their products, whether “hazardous” or not. The guidance for this management practice offers several tools designed to help companies monitor the health, safety and environmental data relevant to their products. These tools include a questionnaire for the suppliers of critical chemicals; a coatings and resins raw materials information request; and information requests designed for the suppliers of hard goods and the suppliers of raw materials.

A commitment to product stewardship includes a commitment to institute methods or systems to ensure that the supplier’s information is adequate as a basis for creating product labels and MSDSs. There should also be procedures and tools similar to those listed above to ensure that the supplier continues to update the information as new data is developed. The guidance also provides the user with a general awareness of this management practice as well as information on the mechanisms for its implementation.

Useful document:

- Critical Chemical Supplier Health Safety and Environmental Questionnaire
- Coatings and Resins Raw Material Information Request
- Requirements for Suppliers of Raw Materials

HSE SUPPORT OF DISTRIBUTORS (2.3)

Support distributor efforts to fulfill their responsibilities for transmitting health, safety and environmental information

Manufacturers and suppliers have an obligation to ensure that end-users and distributors receive accurate health, safety, and environmental information in a timely fashion. A commitment to product stewardship necessarily includes the establishment of a communication system to ensure that new or updated health, safety and environmental data is forwarded on request quickly and efficiently.

The manufacturer is in the best position to develop information and the manufacturer is responsible for making sure information is distributed. This can often be supplemented by establishing a program to enlist distributors to respond to customer inquiries. Additional guidance offers ways to enhance the exchange of information, provide a general awareness of product stewardship, and design mechanisms to ensure its implementation.

Useful content:

- Product Stewardship Distributor Definition
- Chemical Distributor/Reseller Program (Selling the Coatings Care®)

PRODUCT SAFETY/USE

CUSTOMER RELATIONS (3.1)

Establish appropriate working relationships with customers to foster the safe use, disposal, and where appropriate re-use/recycling of industry products and packaging

Paint and coatings companies have the responsibility to safe product handling, use, and disposal information on products to their customers. Manufacturers can address this responsibility by establishing appropriate working relationships with customers. A key feature of customer relationships is to develop a system to obtain feedback from customers to determine if the information they receive is sufficient to assure safe product handling, use, and disposal to include reuse and recycling of industrial products and packaging.

In the course of doing business, manufacturers are often faced with customer requests for information and support. It is important to monitor these requests to identify what safe-handling, use and disposal information is routinely communicated to customers, particularly information provided beyond what is normally included in MSDS's and labels. The manufacturer should also determine what form such "additional" information takes, such as newsletters, bulletins, reports, etc., and how such information is conveyed to the customer (including direct personal visits, telephone contacts, various mailings, electronic media, or presentations at technical forums, trade shows or association meetings).

A manufacturer can inform customers of the company's commitment to Coatings Care® Product Stewardship and what the customer can expect as a result of that promise. The manufacturer should consider identifying and training customer contact personnel to periodically discuss product stewardship issues with their customers. These customer contact personnel should be knowledgeable in safe handling, use, and disposal

methods and proactively seek information from the customer about product-use experiences and concerns. Manufacturers may utilize existing relationships with customers and trade associations to enhance their ability to foster safe product use.

The manufacturer should consider a system to review the progress of customer contacts and other outreach activities. The system may include goals, measurements to assess frequency and effectiveness of customer interaction, and regular review of how information obtained from customers was utilized.

For additional information and detailed discussions of life cycle analysis and recycling, reuse and disposal see Chapter 1.2; for discussions on use and disposal of product see Chapter 3.1; for discussions on customer training and use and disposal see Chapter 3.2.

Useful content:

- Product Stewardship Customer Checklist (to Assess Customer Capabilities)
- Product Stewardship Customer Card (to Introduce Product Stewardship)
- Sample Customer Letter (to Solicit Customer Support)
- Sample Customer Letter (to Provide MSDS and Supplier Notification)

CUSTOMER TRAINING & FEEDBACK (3.2)

Support customer efforts to increase understanding of potential product safety hazards, including, where appropriate, the provision for specific training on product use and associated regulatory requirements

Manufacturers are required by law to communicate safe handling and disposal information on industry products. The principle requirements for communicating such information are spelled out in federal Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HAZCOM, 29 CFR Part 1919.1200), which details the information required on labels and material safety data sheets (MSDS) as well as the requirements of the Federal Hazardous Substance Act (FHSA, 16 CFR Part 1500) and the Consumer Product Safety Act (CPSA, 16 CFR Part 1303). Additional information on safe use and disposal is developed and communicated to customers based on an individual company's assessment of hazards associated with the use of its products.

The development of information on products, whether to address regulatory requirements or specific concerns identified by your company, must be done consistently and in accordance with responsible product stewardship guidelines. In addition, safe handling and disposal information should be periodically reviewed and updated to maintain its utility to customers. Company personnel responsible for developing this information should be knowledgeable on proper engineering and controls for paint application operations (e.g. booth ventilation, application equipment/procedures and personal protective equipment) so that they can be a resource to customers seeking to reduce exposure and attendant risks.

Care should be taken to respect the customer's organizational structure and channels of communication when providing HSE information or responding to specific questions. Oftentimes it is necessary to follow-up after the initial response to information requests to make certain that it has made its way to the right individual. If a paint manufacturer learns of end-uses or conditions of use which were not intended during product development, customers should be advised of these concerns and/or provided additional information, if available, or alternative products that may allow them to handle such end uses or conditions safely and effectively.

Appropriate mechanisms for communicating product stewardship information could include, but are not limited to:

- Training sessions at the customers' site, at designated centers or at local trade schools;
- periodic review of product application and product safety information by salesmen, technical resource personnel or others
- referrals to permitted waste disposal service providers;
- attendance at industry-sponsored seminars, certification programs, etc. (e.g. NPCA, I-CAR, ASI, NACE)
- participation in customer quality management programs; distribution of detailed technical literature, manuals, product data sheets, etc.

Coatings Care[®] participants are encouraged to explore these and other feasible ways to support customer efforts to safely use and dispose of industry products.

Useful content:

- Health and Safety Training Outline for the painters and Shop Owners in the Auto Refinish Industry

UNDERSTANDING & CONTROL OF HSE HAZARDS - CURRENT AND FUTURE (3.3)

Obtain and maintain information on health, safety and environmental hazards and exposures arising from the legitimate use and reasonable foreseeable misuse of new and existing products

Fundamental to any product stewardship program in this industry is a systematic approach to the preparation and distribution of material safety data sheets (MSDS) and precautionary labels. For each product a material safety data sheet and label which comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200) should be prepared. To do this the preparer should be fully aware of all ingredients used in the formulation and should gather, read and understand all related information provided by the raw material suppliers, by governmental agencies, and by the experiences of internal development personnel and product users. Another source of product related information may be published articles in scientific journals or in the trade press. In addition, the manufacturer should be aware of and use label and MSDS preparation guidance provided by appropriate trade associations including the NPCA. The manufacturer should also maintain awareness and practical knowledge of applicable US (and global where appropriate) regulations concerning the distribution, use, and disposal of the coatings products. Reasonable efforts should be made to assure that up-to-date MSDS and label information for formulated products is made available to the persons who are actually applying the formulated coating products.

To the degree feasible, industrial hygiene (occupational exposure) data and relevant toxicological data should be developed and/or collected and reviewed to provide a basis for developing engineering controls and selecting personal protective equipment applicable to typical application scenarios.

The paint manufacturer should identify information on the nature and extent of potential product exposures, including reasonably foreseeable misuse, and document such information in an appropriate system. The system should also all for input on information about actual exposures reported by customers. This information can be used to help assess the suitability of work practices and personal protective equipment recommendations, as well as the need for new or reformulated products with improved environmental, health, and safety characteristics.

SALES TO PROFESSIONALS (3.4)

Establish procedures to ensure that where required by law, products are sold or provided only to professional users

Distribution of some coatings intermediates or formulated paints to customers may be restricted to professional or other specified users groups because of regulations. These regulations may specify, for example, that products can be used only with certain engineering controls or protective equipment, cannot be exported, or could result in a violation of VOC permit limits. Other requirements describe conditions under which the product can be used in compliance with FDA, USDA, or NSF guidelines. On most domestically-sold products, there is no legal restriction on selling to non-professionals, but consumer use of certain products is strongly discouraged because of the strict precautions which must be adhered to when used.

It is appropriate for industrial coatings manufacturers and distributors to set procedures by which sales are to be channeled, including ways in which non-professional use can be discouraged. Awareness of federal, state, and local regulations that impact the distribution of restricted products is essential. These products must be identified, and the customers who use them should be well-informed. Manufacturers can establish systems to ensure that only qualified customers can order and be shipped such products.

Though this Management Practice focuses on legal requirements, the following suggested activities can be applicable to products which have no legal restrictions. A good product stewardship program should discourage consumer use of industrial products which require specialized controls and personal protective equipment for safe use.

PRODUCT RECALL AND RESPONSE TO SAFE USE COMPLAINTS (3.5)

Instigate appropriate procedures for product safety complaints, batch traceability and product recall.

As noted in Management Practice 1.3, Response to Customers and Field Personnel, manufacturers are required to have systems in place to ensure information received from customers is properly evaluated for its product safety implications. One rich source for this information is a product safety complaint. The manufacturer must ensure sales personnel or others with direct contact with customers are trained to pass on such complaints to the appropriate people in their organizations who possess the training, experience and responsibility for validating the legitimacy of the allegation dealing with the product stewardship implications of the information. These implications include possible TSCA 8c or 8e obligations, as well as possible CPSC, OSHA or liability issues. At a minimum, such complaints should trigger investigation and feedback to the customer. Action beyond that may include revisions to hazard communication documents, product reformulation, upgraded customer training or customer site visits. Another possible outcome is a product recall.

To facilitate post-complaint trouble-shooting, it is important to be able to identify whether the complaints are confined to one or more batches of the product and if so, when and where they were manufactured. Some record, which could be as simple as a lot number stenciled on each container, should be made to enable the manufacturer to trace the origins of the batch in order to facilitate the needed investigation. Batch retention should also be kept to help determine if the defect was present upon batch completion or occurred post-shipment.

In some cases recall of the product or some batches of the product may be indicated. Attachment 3.5-1 is the Recall Handbook of the U.S. Consumer Product Safety Commission, designed to assist companies in understanding their obligations with respect to consumer product recalls. With suitable modifications, any manufacturer may utilize the same principles to design a system to handle the recall of products.

Useful content:

- Recall Handbook of the U.S. Consumer Product Safety Commission

Manufacturing Management Code Overview

I. Purpose

The Manufacturing Management Code under Coatings Care® seeks to assist companies in their efforts to conduct their day-to-day plant operations in a manner that is consistent with established health, safety and environmental practices. The goal of the Manufacturing Code is to develop an effective management system for addressing health, safety and environmental responsibilities, including the regulatory requirements and related operational considerations that define an effective program. Experts on NPCA's Environmental Management and Occupational Health and Safety Committees have developed the content of this guide to reflect established management approaches currently used by the industry.

Furthermore, this guide was created with the knowledge that paint and coatings companies have invested considerable resources in their current programs. As a practical matter, the guidance contained in this document is intended to complement and support your current approach for addressing health, safety and environmental responsibilities. The guidance developed for this code reflects regulatory and legislative requirements as well as industry trade practice in the areas of employee protection, community and environmental protection, waste management practices, and other aspects of plant operations.

NPCA strongly believes that implementation of the Manufacturing Management Code under Coatings Care® will allow companies to integrate practical and flexible considerations that add business value.

II. Management Practices

An individual company's implementation of the Manufacturing Management Code of Coatings Care® will require a visible commitment by all levels of management. This commitment should be reflected in published policies, evident in the established accountability for implementation, and supported with sufficient resources.

Specifically, establishing an effective and ongoing manufacturing management program under Coatings Care® requires, as a minimum, that each company address each of the management practices contained in the Manufacturing Code that apply to their operations.

Because of the extensive amount of information required, implementation guidance for the Manufacturing Management Code has been arranged in three separate volumes covering the key topics. They include:

- Volume 1 Occupational Safety and Health
- Volume 2 Process Safety (Operations)
- Volume 3 Environmental Management

In the process of developing the information contained in this guide, NPCA's Environmental Management Committee struggled with establishing a suggested order for addressing the management practices and ultimately arranged the chapters in the third volume to correspond with a logical progression for implementation. And while the chapters suggest an order for implementation, each chapter has also been written to stand alone as a discrete activity that could be tasked individually.

In detailing the suggested activities and other guidance for this code, the committees note that some degree of overlap between the management practices has resulted. While this overlap has been minimized in the final document, several critical activities (such as review of applicable regulatory requirements) are repeated periodically

to emphasize their importance and to make certain they are completed. Any redundancies or overlap identified in the suggested activities can be mitigated by careful documentation of progress made during the implementation effort.

Coatings Care[®] Manufacturing Management Code Management Practices Summary

OCCUPATIONAL SAFETY AND HEALTH (VOLUME 1)

HEALTH AND SAFETY SYSTEMS AND RECORDS (1.1)

Establish and maintain systems for collecting and analyzing data and maintaining records to evaluate health and safety performance, determine trends, and identify areas for improvement in accordance with recognized management systems

Every facility needs a system for collecting and evaluating information on adverse events relating to workplace health and safety (“incidents”) in order to improve future performance and, in many cases, to meet regulatory requirements. Regulations determine the basis for reporting, recording, and publishing certain types of events. Some firms have adopted other measures of performance as well.

1. Decide upon the parameters for measuring health and safety performance for a facility or firm, giving due regard to regulatory requirements.

The number of incidents that has occurred over a specified period of time has traditionally been the measure of health and safety performance. Occupational Safety and Health Administration (OSHA) regulations require that industrial injuries and occupational illnesses be recorded, classified, and reported in a specific manner. Fires, spills, work-related motor vehicle incidents, and injuries to non-employee entrants to the facility are also tracked by many firms. Such incidents are all event-based occurrences that can have negative outcomes. The frequency of such incidents is usually calculated for standard time intervals (days, weeks, etc).

Positive specified performance measures of affirmative activity, such as the “number of safety contacts” have recently been gaining acceptance. Other performance indicators or measures could include Health, Safety and Environment (HSE) audit results or behaviorally based activities/programs/measurements.

2. Adopt a program for implementing the health and safety performance measurement system.
3. Periodically evaluate the effectiveness of the performance measurement system and refine the process accordingly.

Useful content:

- Incident Analysis Summary Sheet, Completed Example
- Incident Analysis Summary Sheet, Blank
- Table of BLS Frequency Rates for SIC 2851/NAIC 32551

PERIODIC TARGETED INSPECTIONS (1.2)

Plan and carry out periodic targeted inspections for conformity with site policies and practices

Workplace inspections should be carried out to ensure a safe and healthful environment, and also to meet federal, state and local regulations that apply to the facility. Develop and implement a program of targeted workplace health and safety inspections that:

- use inspection teams that include facility employees;
- require regular inspections;
- employ checklists;
- use team judgment to target inspections to areas, practices, or processes;
- require documentation of findings and recommendations for improvement; and
- require documented action on findings and recommendations.

Note: In this instance “targeted” is intended to indicate that an area or procedure with a history of problems or record of high incident frequency or severity should be visited and evaluated on a more frequent basis.

Arrange, where practical, for a workgroup consisting of appropriate facility employees and managers to develop the inspection system. Empower the workgroup to determine the types of activities or facility areas to be inspected, and on what frequency, and to develop appropriate inspection forms and checklists. Ensure that inspection results and follow-up actions are documented.

Useful content:

- Self Inspection Checklist, "OSHA Handbook for Small Businesses"
- Chain Hoist Inspection Record

EMPLOYEE INVOLVEMENT (1.3)

Establish a mechanism to provide employees with the opportunity to identify and address health and safety concerns

Management effort dedicated to creating ways for employees to voice health and safety concerns and to address these concerns is good business. Effective employee involvement can lead to better workplace conditions, improved health and safety behavior, improvements in health and safety procedures, and better operating results.

Adopt a program for effective employee involvement in matters that could affect employee health and safety, taking into account the requirements of policies of the firm, labor agreements, and applicable government regulations.

1. Include systems for:

- two-way communication of health and safety information to employees;
- obtaining employee input regarding health and safety including suggestions and concerns;
- providing feedback to employees regarding their health and safety suggestions and concerns;
- recognizing significant employee contributions to health and safety; and
- gauging the effectiveness of employee involvement.

2. Ensure employees receive information that explains how they can communicate their involvement, and that encourages them to do so.
3. For facilities with covered processes, ensure that all applicable aspects of the employee involvement program are documented.

Strive to integrate employee health and safety involvement with existing employee communication practices.

Useful content:

- Employee Involvement Plan (for stimulating employee involvement in workplace safety)
- Safety Meeting Guidelines
- Organizing a Safety Management Committee
- Employee Participation Plan (provides examples of employee participation in workplace safety)
- Safety Awareness — Mini Session (a useful training tool)
- Safety Committee Action Request (SCAR) Form
- Example Recognition System (to reward safety awareness)

WRITTEN HEALTH AND SAFETY PROCEDURES (1.4)

Provide written up-to-date health and safety procedures appropriate to each site, including procedures to control entry and exit of personnel and materials to the site and restricted areas.

It is necessary for the protection of worker health and safety to establish clear written procedures for process operations and for other facility activities, including control of people and materials entering and leaving the facility.

1. Evaluate the facility's needs for written procedures pertaining to protection of worker health and safety, including control of access to the facility and/or to specific areas. Take into account all applicable regulatory requirements.

Address such factors as size and complexity of the facility and its raw materials, pertinent Occupational Safety and Health Administration (OSHA) general-industry regulations requiring formal procedures, and, where applicable, OSHA Process Safety Management (PSM) Standard requirements.

2. Develop a management system meeting regulatory requirements for creating, maintaining, and documenting all procedures that pertain to worker health and safety used in the facility. Use, where possible, multidisciplinary teams.

Either individuals or teams may be used, depending upon facility and task complexity and scope. Involve the ultimate user(s) of the procedure. Strive to ensure regulatory compliance by training team members in their responsibilities.

3. Empower a team to create, revise, and document written procedures pertaining to worker health and safety, including control of access to the facility and/or controlled process areas.
4. Adjust facility staffing as necessary to meet program needs, and implement the program.
5. Periodically audit the program's performance for effectiveness and regulatory compliance, and make adjustments as necessary to address shortcomings.

Useful content:

- Partial List of Regulatory Health and Safety Topics
- Partial List of Less Regulatory, More Good Safety Management Topics
- Partial List of Standard Operating Procedures (SOPs)
- Elements of an Emergency Action Plan
- Example of a Typical Plant SOP for Bulk Raw Material Unloading

CONTRACTOR OPERATIONS (1.5)

Establish procedures to monitor operations of all contractors on-site, and to inform them of company-wide and/or site-specific health and safety policies and emergency response procedures

The following definitions are provided for clarifying some guidance in this practice:

Employee: A full- or part-time worker at a facility, either temporary or permanent, who receives both supervision and compensation directly from the firm managing that facility.

Contractor: An individual within a facility whose compensation and day-to-day activities or assignments are controlled by an independent contractor, and NOT by the firm of the facility in which they work.

Visitor/Vendor: An individual person, other than an employee or contractor, who comes onto a facility for business or other purposes, and who does not influence workplace health or safety programs. Such persons may include consultants, sales representatives, and vendors such as people who service soda machines.

Employers should maintain a safe and healthful workplace for contractors as well as visitors and their own employees.

Facility management is responsible for ensuring that all contractors who enter a facility are informed of processes and materials hazards present there, and also of the facility's emergency plans and expectations for contractors in case of emergency. Furthermore, facility management is responsible for ensuring that contractors employ procedures at least as stringent as the facility's own procedures intended to prevent harm to any one present in the facility, and for confirming, through periodic inspections, that contractors follow such procedures. Applicable federal, state, and local regulations must be observed.

Develop and adopt a contractor orientation and safe-performance assurance program that encompasses the following:

1. Adopt procedures, and develop supporting informational materials, for indoctrinating contractors in safety and emergency procedures before any contract work begins. Include:
 - warning systems and evacuation procedures;
 - entry, exit, and limitations on movement within the facility;
 - sources of harm from processes and/or materials, and measures for prevention, detection, and response;
 - locations of material safety data sheets (MSDS's) in the workplace;
 - facility safety rules applicable to contractors; and
 - permit requirements for designated hazardous activities.

2. Adopt procedures for ensuring that all contractors have health and safety requirements that meet facility standards, including procedures for activities requiring permits and for control of hazardous energy.
3. Adopt procedures for monitoring contractor operations on site to ensure that procedures are followed.
4. Adopt procedures for periodic review of program performance and needs, and modify procedures accordingly.

Useful content:

- Contractor Safety Plan Evaluation Checklist
- Example Contractor/Visitor Orientation Checklist & Sign-Off Sheet
- Example Contractor/Visitor Orientation Checklist & Sign-Off Sheet
- Contractor Field Safety Checklist

EVALUATING AND ASSESSING HEALTH AND SAFETY HAZARDS (1.6)

Establish procedures for evaluating health and safety hazards and assessing risk to employees from processes, equipment, potentially hazardous chemical or physical agents, or site conditions

Employees may be exposed to a wide variety of chemical and physical hazards during normal and non-routine work activities. Process equipment and activities in and around the facility may put employees at risk to injury and illness. Facility management is responsible for providing a safe and healthful work environment for their employees.

Establish a system to effectively anticipate, recognize, evaluate, and control health and safety hazards at the facility. The evaluation, assessment, and/or inspection procedures can be as formal as a written document or as simple as a visual walkthrough evaluation. Adopt procedures for:

- evaluating the facility to identify existing and potential health and safety hazards;
- assessing the risks of identified hazards;
- prioritizing the risks according to severity; and
- instituting corrective actions to reduce the hazards.

Re-evaluate the facility periodically to reflect current guidelines and to identify and address new hazards.

Useful content:

- Personal Protective Equipment Worksheet (PPE)

HEALTH AND SAFETY TRAINING PROGRAMS (1.7)

Maintain health and safety training programs, and periodically evaluate their effectiveness while regularly communicating relevant health and safety information to employees

A well-trained workforce is essential for a safe and healthful workplace. To accomplish this it is necessary to establish a training program for employees that includes the following elements:

- determination of training needs for each segment of the employee population;
- development of training programs consistent with needs;

- timely, consistent delivery of training programs;
- maintenance of comprehensive employee training records;
- annual review and evaluation of training program effectiveness, including field observations; and
- audits of employee training records.

Useful content:

- Safety and Health Training Attendance Log
- Safety and Health Training Grid

ACCESS TO MEDICAL PERSONNEL AND ASSISTANCE (1.8)

Provide access to competent health and safety personnel, and emergency medical assistance for people on the site

In case of a medical emergency, each facility must provide employees with access to medical treatment and transportation to medical care locations. Each facility must also provide required medical surveillance and have access to health and safety professionals, as required to evaluate and investigate health and safety concerns.

Establish, at each facility, a program that complies with all applicable regulations for providing emergency medical response in both routine and emergency situations and for providing employees with required medical examinations.

- Review the regulatory requirements applicable to the facility.
- Identify needs and available resources.
- Augment resources as needed.
- Establish written programs and supporting procedures that meet identified requirements for all employees on all shifts.
- Review program periodically to ensure that it reflects current information and to ensure that resources are available and functioning as intended.

Useful content:

- Site Emergency Response Plan (Table of Contents)
- Emergency Contacts List (from Response Plan)
- Company Medical Attention Procedure

SITE AND FACILITY DESIGN AND MODIFICATION REVIEW (1.9)

Include procedures for reviewing the design and modification of sites, plants and job tasks, taking into account the following hierarchy: engineering controls (design); administrative controls (including material substitution); and the use of personal protective equipment

An effective process health and safety management system must include a program for reviewing and approving the design and modification of facilities, processes, raw materials, and job tasks. Such reviews should include consideration of the use of engineering controls, administrative controls, and the personal protective equipment as appropriate.

1. Establish a team to review and approve the design and modification of facilities, processes, raw materials, and job tasks to ensure that changes meet current health and safety standards.

Engineering controls include the design of equipment and protective measures to eliminate or minimize exposure to hazards. The hazards could be physical/equipment-related such as rotating shafts and nip points; process-related such as temperature extremes and static electricity; or be related to exposure to chemical substances. Administrative controls, such as job rotation, are intended to reduce exposure time to a particular hazard. Substitution with a less hazardous substance is another way to eliminate or reduce the hazard. The use of personal protective equipment (PPE) is a last resort when other controls cannot eliminate exposure to a safe level.

The responsibility for review of work practices with the aim to reduce or minimize hazards should rest with individuals, or groups of individuals, with appropriate training and experience. Qualified reviewers should understand the importance and significance of their work to the health and safety of their fellow employees.

2. Train team members as appropriate in management-of-change procedures and in preferred approaches to hazard management.
3. Ensure that all review-team recommendations are addressed and that the team documents its methods and decisions.
4. Provide for documentation and follow-up all team recommendations.

Useful content:

- Simple Inherent Safety Checklist
- Documentation Checklist for Design or Modification
- Regulations and Code Review Checklist
- Federal Regulations Checklist
- Hazardous Effects of Inadvertent Mixing of Chemicals

INVESTIGATION OF OCCUPATIONAL ILLNESSES, INJURIES, AND ACCIDENTS (1.10)

Require the prompt investigation of occupational illnesses, injuries, and accidents; corrective action to prevent recurrence and an evaluation of the effectiveness of corrective actions taken

Every incident investigation provides a unique opportunity to learn the incident's immediate and underlying cause(s), and to determine and implement opportunities for improvement.

Consider establishing a system for managing incident investigations that includes:

- identifying, investigating, recording pertinent information on incidents that occur anywhere within the facility;
- analysis of results of each investigation and report of recommendations;
- taking corrective actions for the purpose of reducing the frequency and/or severity of future incidents of a similar nature.

The investigative system should be viewed as a fact-finding process to prevent future incidents, rather than form the basis for blame.

Front-line supervisors often start the investigative process by completing the company's incident report form. A responsible individual should be assigned to review all completed incident reports, initiate follow-up corrective actions, and track them to completion. Information from this investigative process can lead to continuous improvement through identification of incident causes and implementation of suitable controls.

Useful content:

- Accident Investigation Instructions (from OSHA's Instructions for Small Business)
- Example Accident Investigation Forms

OPERATIONS (PROCESS SAFETY, VOLUME 2)

EMPLOYEE, CONTRACTOR, AND VISITOR SAFETY (2.1)

Develop written procedures to ensure employee, contractor, and visitor safety during operations

Facility management must comply with federal, state, and local requirements for protecting the health and safety of employees, contractors, and visitors admitted for entry in the facility. In order to accomplish this, it is necessary to acknowledge the responsibility and consider the following practices:

1. Establish a facility process team to evaluate existing and new processes, SOPs, and the emergency response plan as they relate to the control and/or health and safety of visitors and employees.
2. Adopt a program for ensuring that employees, contractors, and visitors are provided information necessary to protect themselves and others when present in the facility by informing them of:
 - all known process-related hazards that could affect them within the facility;
 - the facility's emergency action plan, and emergency response procedures;
 - required safe work practices for employees and contractors;
 - prohibitions applicable to all entrants; and
 - requirements for control of their entry, whereabouts, and exit.

Useful content:

- Team Composition (or Flow Chart)
- Example Safety Standard Operating Procedures (SOP) – Operator, Mechanic, and Contractor Training
- Generic SOP Format

DOCUMENTATION OF PROCESS INFORMATION (2.2)

Document relevant information about plant operations, facilities and process equipment which may be useful in health, safety and environmental management efforts

Documentation of process information is a key requirement for compliance with the OSHA Process Safety Management of Highly Hazardous Chemicals, 29 CFR Part 1910.119.

1. Assemble a process safety information package for each identified process in order to identify and understand the hazards of operations subject to the standard. Include the hazards posed by the chemicals used in the process, the technology of the process, and information on the equipment used in the process.

2. Arrange for all required information to be compiled and organized for review before a process hazard analysis (PHA) is conducted.
3. Document the location(s) of each applicable information source and/or package.

Useful content:

- Checklist of Process Safety Information (PSI)
- PSI Location Summary
- Sample Standard Operating Procedure (SOP) Form
- Management of Change Form

PROCESS PROCEDURES DOCUMENTATION (2.3)

Document procedures for all process operations and maintenance, including start-up and shutdown

Clear, comprehensive, and up-to-date process and maintenance procedures help to ensure that facilities are operated in a consistent manner, that emergency situations are handled properly, and that employees understand how to do their jobs safely. Documentation of the steps necessary to develop and revise procedures enhances management's ability to oversee this function.

1. Develop and implement written standard operating procedures (SOPs) and maintenance procedures that are designed to ensure safe operation of chemical processes.
2. Confirm and document that these procedures are appropriate, clear, and consistent with desired operating and maintenance practices. Use written SOPs and maintenance procedures for training employees.

Emphasize management expectations regarding process safety, and the need for maintaining consistent practices among operating and maintenance personnel.

EQUIPMENT INSPECTION PROGRAM (2.4)

For process equipment, establish a written program for timely inspections of such equipment, including regular testing of all pressure-relieving devices and warning systems

Facility management is responsible for ensuring that a safe workplace is provided for all employees. One aspect of this safe workplace is properly installed, operated and maintained equipment. A periodic inspection program is critical for maintaining equipment and structures in proper working condition.

1. Identify the facility's critical equipment and structures, i.e., those whose failure could subject employees, the community, or the environment to significant harm.
2. Establish a comprehensive equipment inspection program for ensuring, with full documentation, that critical structures and components in process systems perform as intended throughout their service lives. As a minimum, such a program must include the following elements:
 - equipment records
 - inspection and testing procedures and training
 - documented inspections and tests
 - periodic reviews of the program to ensure appropriate procedures and frequencies

3. Conduct periodic reviews to assess the program's success in meeting goals.
4. Modify the program as needed, based either on changing conditions or requirements.

Useful content:

- Equipment Inspection Program
- Example Inspection and Test Record
- Example Maintenance Inspection Form for Critical Hoses

PROCESS TRAINING PROGRAM (2.5)

Develop and administer an employee-training program to ensure safe operation and maintenance of all applicable processes and equipment

Ensuring that employees are well trained is essential for health and safety (and for quality and efficiency as well) in the manufacture of coatings, because processes are often complex and involve large quantities of hazardous chemicals.

1. Adopt a program for training and qualifying operations and maintenance employees to ensure that operations, maintenance, inspection, and testing activities are strictly controlled. Include in the program:
 - the measures that employees can take to protect themselves from workplace hazards;
 - the specific procedures implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures and use of personal protective equipment; and
 - the safe operation and proper maintenance of manufacturing equipment, machinery and facilities.
2. Strive to make training a partnership between employees and management working together. Ensure that trainees can comprehend and apply the material presented. Require that trainees demonstrate proficiency and comprehension.
3. Maintain records of each employee's training for as long as he/she is employed, and thereafter as long as required by applicable local, state, or federal requirements.

Useful content:

- Operational Training Requirements
- OSHA Training Requirements
- Employee Training Matrix
- Employee Record keeping Assessment Checklist for Verification Training

HAZARD ASSESSMENTS AND RISK REDUCTION (2.6)

Perform and document an assessment of hazards for existing and planned manufacturing facilities and take appropriate action to minimize risks identified by the assessment

Manufacturers must systematically investigate the hazards posed by processes within each facility in order to prevent harm from process accidents. One good investigative method is the process hazard analysis (PHA).

1. Organize a process hazard analysis (PHA) team that includes all pertinent expertise. Select knowledgeable people, (including employees, technical specialists, and managers) from affected parts of the facility.
2. After appropriate training, empower the PHA team to:
 - Identify sources of process hazards through the collection and analysis of process information and data.
 - Conduct risk assessments for hazards identified, i.e., estimate the potential frequency and severity of incidents attributable to each.
 - Develop possible risk management measures (corrective actions) for substantial risks and for minor risks that can be readily corrected.
 - Report results and recommendations to facility management.
3. Prioritize corrective measures according to risk assessment results, and establish an implementation timetable for these measures.
4. Conduct periodic management reviews to ensure that the timetable is being met, and, if not, adjust priorities accordingly.

Useful content:

- Example of a Process Hazard Analysis (PHA) for Solvent Transfer

SAFE STORAGE AND HANDLING (2.7)

Establish procedures for the safe storage and handling of all raw materials, intermediates, and products manufactured, used and/or stored onsite

The storage and handling of chemicals is a heavily regulated activity. From the time chemicals are received from a supplier until they are shipped to a customer, they are subject to specific storage and handling requirements and safeguards for the protection of worker and community health and safety.

Employ storage and handling practices for chemical materials that meet requirements of federal, state, and local regulations. Ensure that these practices cover chemicals classified as hazardous at all times that they are present in the facility, from the time they arrive as raw materials until they leave as either product or waste.

FACILITY SECURITY PLAN (2.8)

Develop a site security plan addressing unauthorized entry, vandalism and other relevant considerations

Protecting coatings manufacturing facilities from unauthorized entry, and/or access to sensitive areas of the facility is critical in preventing sabotage, vandalism, and theft of physical or intellectual property. It also prevents injury or hazardous exposure of intruders, and is an important factor in preventing workplace violence.

1. Evaluate facility security requirements based on such factors as:
 - nature of area surrounding the facility;
 - nature and quantity of hazardous materials present in the facility;
 - physical barriers to entry (e.g., fences, staffed gates);

- means of detecting intrusion attempts;
 - history of unauthorized entries; and
 - regulatory requirements.
2. Adopt a facility protection program adequate to meet the threat of unauthorized entry to the facility, usually including at least the following:
 - appointment of a security coordinator;
 - training of security personnel;
 - employee admittance procedures;
 - contractor admittance procedures;
 - access for emergency vehicles; and
 - access for non-emergency vehicles.
 3. Consider adopting a workplace violence prevention program.

Useful content:

- Factors to Consider Regarding Security Plans
- Sample Section of Security Plan
- Bomb Threat Security Questionnaire
- OSHA Fact Sheets 1996 — Protecting Community Workers Against Violence

ENVIRONMENTAL MANAGEMENT (VOLUME 3)

OBTAINING MANAGEMENT COMMITMENT (3.2)

Obtain and maintain a clear commitment from company management to reduce emissions and discharges to all media and the off-site transfer of waste

As with most efforts undertaken by companies, success is best achieved when management is involved early, provides adequate resources consistent with business needs, and continues to be supportive through completion of the project.

Implementation of the management practices under Coatings Care[®] can be initiated only after top management has made a commitment to support the program. Commitment includes:

- pledging to implement the program;
- subscribing to (endorsing) the policy statement; and
- assigning a Coatings Care[®] Coordinator to guide the firm's efforts.

Top management's support provides those who will be involved in the implementation effort with a clear sense of the firm's intention to better manage health, safety, and environmental responsibilities.

Industry surveys indicate that top management's initial reasons for supporting Coatings Care[®] vary, but fall into three basic categories; **maintaining** corporate image, **meeting** compliance requirements, and **adding business value** by effective management of health, safety and environmental (HSE) resources.

Maintaining corporate image, while an important motivator, is not the best management foundation for building a Coatings Care[®] implementation effort. Corporate image often derives from a number of factors, many of which are outside the scope (or control) of the Coatings Care[®] program. Should a serious problem

occur in the health, safety and environmental (HSE) area within a firm, it is unlikely that Coatings Care[®] program participation alone would preserve or restore corporate image. For this reason, management support for Coatings Care[®] cannot be based solely on, or motivated by, corporate image.

Maintaining compliance with the myriad of regulations facing coatings manufacturers is another benefit management has linked to Coatings Care[®] participation. For this goal to be achieved, however, firms need to integrate Coatings Care[®] into their existing management or compliance programs. This implementation guide focuses on establishing an environmental management system (EMS) to support this goal. It is important that, from the outset, management clearly identify how implementation of Coatings Care[®] will be integrated with other “management systems” used in the organization and clarify how the Coatings Care[®] commitment relates to existing organizational objectives, or management systems.

The most valuable management perspective that will sustain Coatings Care[®] implementation is one based on the program’s ability to add business value. Coatings Care[®] offers tangible (and intangible) benefits to firms seeking to optimize their resource investments in HSE programs. One obvious benefit is the way in which Coatings Care[®] (and in particular the Environmental Management aspects of the Manufacturing Management Code) can help firms to explore ways in which to reduce emissions, discharges and off-site transfers of waste. Programs designed to accomplish this include pollution prevention, environmental management, or waste minimization. They are usually undertaken with strong management support because of the business value they offer (e.g., reduction of costs for pollution control/waste management, reduction or elimination of fines and/or penalties, and less burdensome permit conditions) as well as organizational (programmatic) benefits. Those responsible for the implementation of Coatings Care[®] must communicate effectively with management on the business value of the implementation effort, particularly with respect to the reduction of emissions, discharges, and off-site transfers.

Organizing an effective EMS requires teamwork. All participants need to be aware of their accountability for the implementation effort, from top management to facility management to staff assigned specific tasks. It is particularly important to reinforce this as corporate goals and objectives are communicated to manufacturing facilities for implementation. Broad management support and shared accountability for reaching these goals requires a mutual understanding. In many firms, management has accomplished this by establishing “pollution prevention” or “waste management” teams charged with finding the “best” ways for their firms to plan and implement efforts to meet targeted reductions.

CREATING AN ENVIRONMENTAL MANAGEMENT SYSTEM (3.1)

Develop a written environmental management system.

This practice covers the development of an organized approach to environmental planning to aid facilities in dealing with management issues generated by facility operations and the myriad of federal, state, and local environmental regulatory requirements that affect them. While compliance with such regulatory requirements is of critical concern for most coatings firms and facilities, it is increasingly important to look at these obligations from a management perspective.

An organized, structured approach to environmental management, integrated throughout the facility’s operations, is called an environmental management system (EMS) and it is the critical foundation for addressing all of the environmental management practices under Coatings Care[®]. In fact, the other chapters contained within this volume of the Manufacturing Management Implementation Guide cover some of the specific activities companies need to address under an EMS. Implementing an effective EMS will enhance business value, improve environmental performance, and aid in managing this complex function.

This management practice outlines the elements of an EMS that integrates environmental control efforts. An EMS for a facility contains details of:

- program structure;
- internal and external communications;
- procedures for monitoring environmental and/or process control systems;
- recordkeeping;
- emergency response;
- initiation of corrective actions;
- integrating the EMS in facility planning;
- employee training; and

Coatings Care[®] provides the framework for developing the EMS. It draws upon established EMS standards, such as the International Standards Organization (ISO) 14001 Standard for Environmental Management Systems and the European Union's Eco-Auditing Management System (EMAS). Consequently, implementing an EMS under Coatings Care[®] can help a firm or facility prepare for eventual conformance with such standards.

This chapter and the guidance provided in other chapters of the Coatings Care[®] and the Manufacturing Management Code, covers programs that may already be in place at many facilities. Nevertheless, organizing and coordinating environmental control efforts under a facility EMS offers several potential benefits:

- improved environmental performance;
- reduced liability;
- improved and/easier compliance with laws and regulations;
- potential regulatory relief;
- reduced costs for insurance, water, waste management, and energy;
- enhanced customer trust/competitive edge;
- employee involvement/commitment to improved environment;
- enhanced public image; and
- easier access to capital.

Establishing an EMS is a long-term strategic effort, particularly with respect to realization of some of the business-related benefits outlined above. The key to an effective environmental management system is the use of an organized approach to planning, controlling, measuring and improving the facility's efforts. Potentially significant improvements and cost savings can be achieved by periodically reviewing the organizational processes that have become part of the environmental management program.

Implementing a comprehensive EMS involves significant management effort and attendant costs. Yet manufacturers and other organizations now participating in Coatings Care[®] are convinced that the organizational benefits far outweigh the costs of implementation. The Coatings Care[®] framework, including the resources and guidance contained in this document, has been designed to minimize the effort and maximize the benefits of establishing an EMS.

Useful content:

- Procedure for Tracking and Identifying Environmental Regulatory Information
- Applicable Environmental Bulletins
- Qualitative Identification of Environmental Impacts Checklist
- Sample Environmental Management Goals

TRACKING COMPLIANCE (3.11)

Maintain all applicable facility environmental permits

This management practice focuses on facility environmental permits and underlying compliance requirements that call for established programs and practices for meeting legal obligations (i.e. Clean Air Act Operating Permit, Resource Conservation and Recovery Act Permit, etc.). Implementing this management practice will help facility management to determine if:

- the facility has all required environmental permits;
- all the required “performance criteria” in permits (i.e. allowable emissions) are understood;
- compliance issues associated with permits are being evaluated and addressed;
- proper consideration is given to improving performance when updating or modifying permits; and
- opportunities for lowering costs and improving efficiencies are explored when considering permit requirements.

Compliance with facility permits and other regulations is important to avoid costly legal penalties, maintain public image, and facilitate future regulatory negotiations. Facility management and personnel need to identify and clearly understand permit conditions, and maintain facility compliance as an integral part of the environmental management system (EMS).

To assure that current permits are renewed and to help facilitate permit applications, a permit schedule (timeline) should be developed. First, compare old permit conditions with renewed permit conditions and consider future facility upgrades and process changes in the permit application or renewal process. It is important to understand the potential operational impacts that could arise from changes in permit requirements (or vice versa).

It is important to emphasize that while many facility permits relate to operating conditions or the allowable levels of discharges, emissions or process releases, some permits are primarily administrative (i.e. Resource Conservation and Recovery Act (RCRA) permits for hazardous wastes, or Toxic Substance Control Act (TSCA) consent orders for chemical use). These additional types of facility permits are equally as important and require consistent analysis and assessment to verify and maintain compliance conditions.

ENVIRONMENTAL ASSESSMENT (INVENTORY OF EMISSIONS, WASTES, AND RELEASES) (3.6)

Develop a quantitative inventory of emissions and discharges to all media and the off-site transfer of wastes from each site

This practice focuses on the quantification of all materials released by a facility to, or deposited as solid waste into, the environment. Such quantification efforts help to establish an “inventory” of all process-generated wastes, discharges, and releases. Included in this inventory are materials subject to complex regulatory requirements and facility operating permits.

Complete a quantitative inventory of facility emissions, discharges, and unrecovered wastes by first identifying and reviewing facility operations and develop profiles for each. Prepare a report to management that includes not only inventory findings, but also ideas for reducing emissions, releases, and waste generation.

Develop written procedures for assessing the potential environmental impact of proposed new raw materials or process changes. Complete a quantitative inventory of facility emissions, discharges, and unrecovered wastes by first identifying and reviewing facility operations and develop profiles for each. Prepare a report to

management that includes not only inventory findings, but also ideas for reducing emissions, releases, and waste generation.

Develop written procedures for assessing the potential environmental impact of proposed new raw materials or process changes.

Useful content:

- Process Change Authorization Form

TARGETING REDUCTIONS (3.4)

Establish priorities, plans and quantifiable goals for reducing emissions and discharges to all media and the off-site transfer of wastes

This chapter focuses on pollution prevention, which is an important aspect of a productive environmental management system (EMS).

The hierarchy of priorities in pollution prevention should be:

1. Prevent or minimize waste generation **at the source**.

NOTE: Many times this can be accomplished by considering feasible formulation changes, process modifications or other techniques identified in the Coatings Care[®] Product Stewardship Implementation Guide.

2. Recycle/or reuse leftover material that might otherwise be considered a waste.
3. Treat wastes (if permissible).
4. Properly dispose of those materials that are truly wastes.

Facilities should establish plans that include priorities and quantifiable goals for targeted reductions in emissions, discharges, and off-site transfers of wastes. Plan outlines should be communicated to interested parties and reviewed on a periodic basis.

Useful content:

- Paint Pollution Prevention Program — Policy Statement
- Guidance for the Elements of a Waste Minimization Plan
- 150 NPCA Pollution Prevention Ideas

SPILL PREVENTION AND CONTROL (3.8)

Develop a spill control program for each site including procedures to monitor storage tanks and transfer piping for leaks and spills

A common element of an Environmental Management System (EMS) for a coatings facility is a spill prevention and control program. Such a program includes:

- identification of potential spill areas;

- development and implementation of procedures for governing operations so as to anticipate the potential for spills, minimize their frequency, and mitigate the severity of any that occur; and
- ensuring that employees understand the importance of spill prevention and control and are well trained to recognize and manage spills in strict accordance with established procedures and regulations.

Useful content:

- Facility Storage Inventory Form
- Spill Sources and Pathways Checklist
- Storage Inspection Checklist
- Record of Dike Drainage
- Spill Prevention Control and Countermeasure (SPCC) Plan Compliance Checklist
- Spill Reporting Form
- Tank Truck Unloading: Spill Prevention and Response Procedure

INVOLVING CONTRACTORS (3.10)

Establish procedures to monitor all contractors on site, to inform them of company and/or site-specific environmental policies and procedures

The purpose of this management practice is to develop procedures to ensure that the practices outlined in your company's environmental management system (EMS) are followed during contract work. This necessitates careful monitoring of contractors, their employees and their subcontractors while they perform work at your facility. Any contractor that is hired to perform work is also an employer and therefore responsible for the health, safety, and environmental (HSE) aspects of their work. However, facility owners and operators can be held liable for any adverse environmental impacts associated with the contractor's efforts.

When you bring contractors on-site to perform certain tasks that have health, safety or environmental (HSE) considerations, you may also assume certain responsibilities. Specifically, you should consider undertaking any or all the following in your efforts to ensure a safe and environmentally sound project:

- evaluate the environmental compliance performance of contractors;
- check that contractors have the proper insurance and required employee training;
- check that contractors have necessary safety equipment;
- inform contractors of relevant aspects of the facility's environmental management system;
- evaluate the performance of contractors to ensure that they are fulfilling their obligations; and
- include HSE requirements in all work contracts with contractors.

Useful content:

- Contractor/EMS Policy Conformance Checklist

MANAGING PROCESS CHANGES (3.5)

Implement production processes that minimize impact on worker health, safety, and environment

Include in the facility's Environmental Management System (EMS) provisions for ensuring that facility planning and process design changes are consistent with organizational goals and objectives for

environmental performance. An organizational commitment to pursue continuous improvement will include the establishment of procedures for incorporating operational changes that seek to comply with regulations and incorporate new technology, equipment, or industry standards.

Include in the facility's EMS provisions for the management of changes that occur from new legal or regulatory requirements, newly determined environmental health or safety risks, technology changes, financial or business requirements, and/or community concerns (or concerns raised by other outside entities).

Develop procedures to ensure that each process change and facility addition is carefully reviewed and approved by responsible parties, both environmental specialists and facility managers, to take advantage of their experience, knowledge, and judgment. Share lessons learned from successful programs to advance the understanding of the coatings industry.

Useful content:

- Sample Process Change Authorization Form
- Sample New Raw Material Authorization Form
- Sample Management of Change Approval Checklist

EMPLOYEE TRAINING (3.3)

Establish an ongoing education and training program for employees on the facility environmental management system (EMS)

Training and education in environmental awareness and emergency response must be provided to personnel, especially to those whose work activities may affect, or have the potential to create, a significant environmental impact. Training makes employees aware of the potential impacts of their work activities and aims to ensure that they will comply with regulations, work to prevent spills, and reduce wastes at the facility.

Useful content:

- Employee EMS Training Matrix/ Environmental Training Log

COMMUNICATING RESULTS (3.7)

Measure and analyze the results of environmental management efforts and communicate appropriate information to customers, suppliers, government agencies, and the public.

Environmental laws and regulations require that facilities submit to regulators considerable information about the properties of the materials handled at the facility and other aspects of the facility's environmental performance. Most reports are available to the public. In many areas, active citizens' groups and/or the press review submissions critically and respond to them vocally. Therefore, it behooves management to develop and maintain strong communications links with all affected entities.

Include in the facility's environmental management system (EMS) provisions for ensuring effective communication of information on organizational progress and key environmental events or issues. Direct communication to several diverse audiences (stakeholders), including top management, employees, customers, suppliers, governmental agencies, and the public.

In developing a comprehensive communication program, consider:

- determination of appropriate spokespersons;

- identification of technical resource personnel;
- determination of the format and content of any communication; and
- defining the circumstances under which planned communications are authorized to go forward.

ASSESSING THE EFFECTIVENESS OF THE ENVIRONMENTAL MANAGEMENT SYSTEM (AUDITING) (3.9)

Carry out periodic targeted inspections to evaluate the effectiveness of the environmental management system

This practice covers the establishment of mechanisms for assessing the effectiveness of a facility's environmental management system (EMS) in meeting its stated goals and objectives.

Many terms are used to describe the assessment effort. One term, auditing, is frequently used to describe the process of a systematic evaluation of a firm's EMS. The practice of auditing has emerged partly in response to the myriad of complex regulatory and compliance requirements faced by manufacturers. For firms with diverse, widespread operations, some form of auditing is regularly used as a means of determining the degree to which legal obligations are met.

In this management practice, the term environmental assessment, rather than audit, is used to characterize the process of evaluating the effectiveness of a facility's EMS, thus distancing the effort called for in this management practice from a typical compliance audit.

Establish programs and procedures covering the scope, frequency, methods, and reporting requirements for assessing the effectiveness of the facility's EMS. The assessment should include: (1) review of the specific practices used at the facility to meet management goals and objectives; (2) identification of any gaps or deficiencies for each of the specific environmental areas of concern; (3) review results of previous assessment efforts in order to determine adequacy of response to previously identified shortcomings.

A firm's EMS can be fully effective only if adequate attention is given to its oversight; management is able and willing to address deficiencies; and management is open to redirecting facility resources and amending facility policies and procedures to improve performance.

Two levels of assessments should be employed. The first is an internal effort in which trained facility personnel are used to determine the degree to which established systems and procedures are regularly followed. Conduct this self-assessment at least once per year, and take appropriate follow-up and remedial action whenever inconsistencies are found.

The second level of assessment makes use of external (i.e., not facility based) assessors. The function of the assessment is to serve as a reality check to determine if the established systems (planning, performance, regulatory, communications, etc.) are effective and fully implemented. This level of assessment not only addresses shortcomings in compliance with established procedures, but also determines whether a system is achieving the goal for which it was developed. Conduct second-level assessments regularly, but less frequently than first-level assessments (usually every three to five years).

Useful content:

- Preventive and Corrective Action Plan
- Pre-Assessment Questionnaire
- Sample Communications to Assessment Team
- Management Review Procedures
- Setting and Tracking Environmental Goals and Priorities

Community Responsibility Code Overview

I. Purpose

The Community Responsibility Code has two major elements. The first element seeks to help protect employees and communities by assuring that each coatings manufacturing facility has an established program coordinated with local authorities, to respond to facility emergencies.

The second element assists companies in establishing and maintaining community outreach efforts that communicate relevant information and respond to questions and concerns regarding health, safety and the environment.

II. Management Practices

An individual company's implementation of the Community Responsibility Code of Coatings Care[®] will require a visible commitment by all levels of management (e.g., through published policies, accountability for implementation, and provision of sufficient resources, etc.). Therefore, NPCA members are encouraged to establish an ongoing community responsibility program, which addresses the following management practices:

Coatings Care[®] Community Responsibility Code Management Practices Summary

EMERGENCY RESPONSE

EMERGENCY RESPONSE COMMUNICATION (1.1)

Prepare a written emergency response plan (ERP) for each operating site

The Occupational Health and Safety Administration (OSHA) and the U.S. Environmental Protection Agency (EPA) both require operating sites to maintain a current Contingency Plan or Emergency Response Plan. These plans, which are often combined into one emergency response plan, traditionally cover the "operational" aspects of responding to an emergency on site. Critical operational elements covered under typical emergency response plans include:

- emergency site evacuation plans
- fire response procedures
- chemical spill procedures
- hazardous waste spill procedures
- first aid
- personal protective equipment
- emergency communications

This chapter is solely dedicated to describing the final element in the above list, effective emergency communications. The other elements listed are covered separately in the Manufacturing Management Code.

In the next year, one in four American companies will experience an emergency that attracts the attention of the media¹. Therefore, it is essential that companies plan a response to emergencies in advance. By following

¹ Charles Graves, National Paint and Coatings Association: Crisis Management Workshop, November 1-2, 1999.

a plan during emergencies, your company's communication staff can provide concise, accurate, and timely information to the appropriate stakeholders. Providing good information also allows emergency personnel to quickly assess the situation and respond accordingly. Finally, a good plan may allow a company to avoid unfair criticism from the media and community.

Useful content:

- Emergency Response Checklist
- Crisis Communication Checklist
- Crisis Communication "Do's" and "Don'ts"
- Crisis Management Plan

EMERGENCY EVACUATION PLAN (1.2)

Prepare a site evacuation plan to be followed in the event of an emergency

Employer, visitor and contractor safety takes precedence in an emergency. The first few moments of an emergency are critical. During this time, the situation must be identified and assessed, the need to evacuate evaluated, and an employee evacuation alarm activated (if necessary). An effective plan will address these three steps and also provide training to employees with the goal of evacuating employees, visitors and contractors from hazardous areas during an emergency.

In many cases, an evacuation plan is one aspect of an overall emergency response/action plan. The specific details on preparing an emergency response/action plan are presented in the Manufacturing Management Code. This chapter is specifically limited to describing the content of an emergency *evacuation* plan.

Useful content:

- Emergency Evacuation Drill Evaluation Sheet
- Evacuation Route Inspection Checklist
- Visitor/Contractor Safety Sign-In Log
- Section 2: Employee Education and Training

EMPLOYEE EDUCATION AND TRAINING

EMPLOYEE EMERGENCY TRAINING (2.1)

Initiate an appropriate training program for facility personnel involved in any emergency response effort detailed in the emergency response plan

The Community Responsibility Code of Coatings Care[®] aims to protect employees and communities by assuring each coatings manufacturing facility establishes an emergency response program coordinated with local authorities to initiate and maintain community outreach efforts. One of the most critical factors in achieving these goals is employee and management education and training. Without a well-trained and experienced workforce, an organization may struggle to respond to emergency situations.

Training for the emergency response program can be divided into two unique categories:

- Regulatory-driven training for operational (production) personnel to react to facility emergencies like fires, spills, etc.

- Training for communications staff to discuss emergency response with key stakeholders.

The first category is covered at length in the Manufacturing Management Implementation Guide; the second category is discussed in other parts of the community responsibility guidance, particularly for regulatory-driven training programs. Regulations governing emergency action and response include:

- OSHA Hazardous Waste Operations and Emergency Response – 29 CFR 1910.120
- OSHA Emergency Action Plan (facility evacuation) – 29 CFR 1910.38 (a)
- Clean Air Act (prevention of accidental releases) – 112 (r)

This practice focuses on developing and assessing a training program for emergency response personnel.

Useful content:

- Emergency Action Training Grid

EMPLOYEE EDUCATION AND INPUT (2.2)

Provide a forum for employee input on health, safety and environmental issues of importance to the community

Employee input on health, safety and environmental (HSE) issues that effect the work environment or the community can be very valuable. Since many employees are likely to live in the surrounding community, they may be sensitive to community concerns that have potential impact on the company. Employers would be well served to tap this information source.

Employee behavior and attitudes while away from work may directly affect a company's reputation in the community. Providing a forum for employees to air their grievances, identify concerns, and offer suggestions will likely make employees feel like a valued member of the organization. Ultimately, employees will have pride in their work and the company, which may be reflected in their conduct away from work.

Due to the importance of employees having knowledge of HSE issues, some of the suggestions mentioned in the management practices of other codes and are meant to provide guidance on fostering the communication between employee and employer, rather than provide a detailed list of HSE information important to employees. Information offered in the practice guidance may also work in conjunction with any training of employees on HSE issues. Both employers and employees can use employee feedback to improve the training process.

Useful content:

- Employee Input Form (on Important Community Issues)

HEALTH, SAFETY AND ENVIRONMENTAL COMMUNICATIONS (2.3)

Train key facility personnel who communicate with employees and the public (including the media) regarding health, safety and environmental matters

Key facility personnel who are well trained in communicating health, safety, and environmental (HSE) information are vital — not only when an emergency occurs, but as part of the daily safe operation of the facility. Knowing who to talk to, what to say, and when to say it can prevent an emergency from occurring or prevent a disastrous outcome if an emergency occurs. The following outline is intended to help train key facility personnel to communicate effectively with employees, the public, and the media about health, safety,

and environmental matters. Each facility is unique and could tailor these guidelines to maximize the effectiveness of its training program.

COMMUNITY LIAISON

INFORMING GOVERNMENT AND BUSINESSES (3.1)

Inform local government officials and other businesses in the community about the facility, including the emergency response and site evacuation plans

As common practice, companies are encouraged (and, in some cases, required by law) to keep local officials, public facilities and businesses apprised of their emergency response and site evacuation plans. Beyond providing this basic health, safety, and environmental (HSE) information, maintaining open communication with local officials and businesses in the community is often advantageous.

The steps taken in this chapter will set the stage for implementing suggested activities for community outreach activities.

COMMUNITY OUTREACH (3.2)

Establish a process for interested persons to become more informed about the facility and its safety procedures and requirements, including the benefits of Coatings Care®

Most crises do not occur overnight. Instead, small problems often turn into crisis situations because of a company's inability to identify or respond to the original issue. This management practice deals with communication during a crisis and guidance concentrates on limiting the impact of crisis situations through communication and community outreach techniques.

It is important to note that it is nearly impossible for a company to establish goodwill during an emergency. In an emergency, a company's attention is usually focused on mitigating the dangerous or potentially hazardous situation, providing support to emergency responders and accounting for all employees. Goodwill that has been established over time can be a valuable asset during an emergency and can earn the respect and trust of the community.

Initiating community outreach efforts that communicate a company's health, safety and environmental policies and procedures can establish goodwill within the community. The scope of a company's community outreach efforts may depend on the size of the organization, the nature of the business, and the resources available. The development of outreach activities may be a group or individual effort. Management support is critical.

Useful content:

- Employee Outreach Plan (helps employees communicate with the community)
- School Ambassador Program (increase student interest in science)
- Sample Charity Program and Form (supports companies to volunteer in community)

Security Code Overview

I. Purpose

The Security Code under Coatings Care[®] seeks to assist companies in their efforts to conduct their day-to-day plant operations in a manner that is consistent with established health, safety, security and environmental practices. The goal of the Security Code is to assist a company in developing an effective management system for addressing security issues, including the regulatory requirements and related operational considerations that define a comprehensive security program. NPCA's Coatings Care[®] Security Committee has developed the content of this guide to reflect established management approaches currently used by the industry.

The code is designed to help companies achieve continuous improvement in security performance using a risk-based approach to identify, assess, and address vulnerabilities as needed. The Code is also designed to assist companies in preventing or mitigating incidents, enhancing training and response capabilities and maintaining and improving relationships with key stakeholders. The Coatings Care[®] Security Committee recognizes that not all facilities share the same risk of security threats/incidents, particularly terrorists threats/incidents. Thus, the degree to which different management practices under the Security Code are implemented may vary greatly depending upon the company or site. The initial guidance for the Security Code – Analyses of Threats, Vulnerabilities and Consequences – presents companies with tools that can be used to determine the applicability and subsequent implementation of the remaining management practices in the Security Code. Therefore, the evaluation is designed to be used by a company or facility as a starting point to determine the appropriate applicability of the rest of the Security Code to that site. In addition, the Security Committee recognizes that the management practices in the code will be implemented with the understanding that security is a shared responsibility requiring actions by others such as customers, suppliers, service providers and government agencies.

Furthermore, this guide was created with the knowledge that paint and coatings companies have invested considerable resources in their current programs. As a practical matter, the guidance contained in this document is intended to complement and support your current approach for addressing health, safety, and environmental responsibilities.

NPCA strongly believes that implementation of the Security Code under Coatings Care[®] will allow companies to integrate practical and flexible considerations that add business value.

II. Management Practices

An individual company's implementation of the Security Code of Coatings Care[®] will require a visible commitment by all levels of management. This commitment should be reflected in published policies, evident in the established accountability for implementation, and supported with sufficient resources.

Specifically, establishing an effective and ongoing security management program under Coatings Care[®] requires, as a minimum, that each company evaluate each of the management practices contained in the Security Code that apply to their operations. In detailing the suggested activities and other guidance for this Code, the Committee noted that some degree of overlap between the management practices has resulted within the 9 Chapters. While this overlap has been minimized in the final document to the extent possible, several critical activities are repeated periodically to emphasize their importance. Any redundancies or overlap identified in the suggested activities can be mitigated by careful documentation of progress made during the assessment and implementation effort.

The Security Code complements and is designed to be implemented in conjunction with the other Coatings Care[®] management practices that demonstrate the industry's commitment to protecting employees and society. Existing management practices that enhance community responsibility, emergency preparedness, pollution prevention,

process safety, employee health and safety, product distribution and product stewardship often relate to security. Companies should regularly reassess those security related practices in the spirit of continuous evaluation and improvement.

Coatings Care[®] Security Code Management Practices Summary

ANALYSIS OF THREATS, VULNERABILITIES AND CONSEQUENCES (1.0)

Prioritize and periodically analyze potential security threats, vulnerabilities and consequences using accepted methodologies

Using generally accepted tools and methods, companies will conduct analyses to identify how to further enhance security. This process will be applied at operating facilities using appropriate vulnerability assessment methodology. Security of product sales, distribution and cyber security should also be analyzed using appropriate methodology. These initial analyses will be conducted on an aggressive schedule then conducted periodically thereafter.

Useful content:

- Facility Security Prioritization Process
- ACC Security Prioritization Tool
- Security Prioritization Example
- NPCA Vulnerability, Threat and Consequence Prioritization Checklist
- Facility Evaluation Criteria
- Chemicals with Potential for Misuse in Weapons of Mass Destruction
- Chemicals Covered by the Chemical Weapons Convention
- US DOT Facility Security Checklist
- US DOT Security Checklist for the Shippers, Carriers and Receivers of Hazmat
- US DOT Guidelines for Conducting an Employee Background Check
- List of Alternative Vulnerability, Threat and Consequence Analysis Methodologies

IMPLEMENTATION OF SECURITY MEASURES (2.0)

Develop and implement security measures commensurate with risks, and take into account inherently safer approaches to process design, engineering and administrative controls, and prevention and mitigation measures

Companies will take action when they identify and assess potential security risks. Actions can include putting additional or different security measures into place to provide greater protections for people, property, products, processes, information and information systems. At facilities, actions can include measures such as installation of new physical barriers, modified production processes or materials substitution. In product sales and distribution, actions can include measures such as new procedures to protect Internet commerce or additional screening of transportation providers.

Useful content:

- Sample Color Code Security Response System
- Sample Emergency Response Plan for Civil Disturbances
- Sample Guidance on Suspicious Letters and Packages

- Sample Bomb Threat Procedures
- Sample Pre-employment Screening Policy
- Sample Workplace Violence Policy
- Sample Employee Misconduct Policy
- Sample General Weapons Policy
- Sample Policy on Drug and Alcohol Use
- Sample Compact, Unified Security Policy and Procedures

INFORMATION AND CYBER-SECURITY (3.0)

Recognize that protecting information and information systems is a critical component of a sound security management system

Companies will apply the security practices identified in this Code to their cyber assets as well as their physical assets. Information networks and systems are as critical to a company's success as its manufacturing and distribution systems. Special consideration will be given to systems that support e-commerce, business management, telecommunications and process controls. Actions can include additional intrusion detection and access controls for voice and data networks, verification of information security practices applied by digitally-connected business partners, and new controls on access to digital process control systems at our facilities.

Useful content:

- Information Security Charter
- Security Awareness Policy
- Information Security Guideline/Standard

DOCUMENTATION (4.0)

Document security management programs, processes and procedures

To sustain a consistent and reliable security program over time, companies will document the key elements of their program. Consistency and reliability will translate into a more secure workplace and community.

Useful content:

- Example Records Keeping Matrix

TRAINING, DRILLS AND GUIDANCE (5.0)

Training, drills and guidance for employees, contractors, service providers, value chain partners and others, as appropriate, to enhance awareness and capability

As effective security programs evolve, companies will keep pace by enhancing security awareness and capabilities through training, drills and guidance. This commitment extends beyond employees and contractors to include others, when appropriate, such as product distributors or emergency response agencies. Working together in this fashion improves our ability to deter and detect incidents while strengthening our overall security capability.

COMMUNICATIONS, DIALOGUE AND INFORMATION EXCHANGE (6.0)

Communications, dialogue and information exchange on appropriate security issues with stakeholders such as employees, contractors, communities, customers, suppliers, service providers and government agencies balanced with safeguards for sensitive information

Communication is a key element to improving security. Maintaining open and effective lines of communication includes steps such as sharing effective security practices with others throughout industry and maintaining interaction with law enforcement officials. At the same time, companies understand that their role is to protect employees and communities where they operate, while safeguarding information that would pose a threat in the wrong hands.

Useful content:

- Crisis Line Response Form
- Pre Recorded Telephone Message Guide

RESPONSE TO SECURITY THREATS (7.0)

Evaluate response, reporting and communication of security threats as appropriate

Companies take physical and cyber-security threats very seriously. In the event of such threats, companies promptly will evaluate the situation and respond. Real and credible threats will be reported and communicated to company and law enforcement personnel as appropriate

Companies should have a standard baseline of security measures in place. When a certain threat level is reached or indicated additional pre-determined security measures would be added to the baseline measures.

- Useful content:
- Threat Categories
- Possible Threat Responses
- Suspicious Purchases

RESPONSE TO SECURITY INCIDENTS (8.0)

Evaluate response, investigation, reporting, communication and corrective action for security incidents

Member companies will be vigilant in efforts to deter and detect any security incident. If an incident should occur companies will promptly respond and involve government agencies as appropriate. After investigating the incident, the member company will incorporate key learnings into its security practices and implement necessary corrective actions. As appropriate, lessons learned from an incident will be shared with others in industry and government agencies.

Useful content:

- Security Response Checklist

SECURITY REQUIREMENTS FOR HAZARDOUS MATERIALS TRANSPORTATION (9.0)

Develop and implement a hazardous materials transportation security plan and associated security awareness training

On March 25, 2003 the Department of Transportation (DOT) published a final rule (HM-232) establishing new requirements to enhance the security of hazardous materials transported in commerce. Shippers of certain highly hazardous materials and shipments of hazardous materials that require placarding must develop and implement security plans. In addition, all shippers of hazardous materials must assure that their employee training includes a security component.

Useful content:

- Security Awareness Training Module Information
- Guide to Drafting and Implementing Your Company's Security Plan and Security Training
- Sample Security Plan