

# Chemical Control Program

## Purpose

The GWSI Chemical Control Program aims to ensure the safe handling, storage, use, and disposal of chemicals to protect employees, customer freight, and GWSI facilities from spills and exposure. This program applies to all employees who handle, store or dispose of chemicals within GWSI.

## Chemical Introduction

All chemicals introduced to a GWSI facility that will impact food goods storage or handling must be reviewed by the Food Safety Team (FST) to approve storage methods and safe handling procedures (SHP).

The FST review and SHPs will include consideration of the following:

- A risk assessment will be conducted for each chemical covering:
  - Identifying hazards and exposure routes
  - Categorize the chemical by risk level (low, moderate, or high)
  - Develop risk mitigation strategies for high-risk chemicals
- Adherence to applicable regulations:
  - Occupational Safety and Health Administration (OSHA)
  - Environmental Protection Agency (EPA)
  - State and local regulations
- Compliance with Safety Data Sheet (SDS) requirements for each chemical regarding storage, use, clean up, and disposal.
  - SDS' for all of GWSI will be scanned and stored on the shared drive for quick and easy access.
  - Hard copies of the SDS' specific to each facility will also be contained in the SDS section of the Food Safety Program binders at that facility.
- Procuring the appropriate Personal Protective Equipment (PPE) required per the SDS for proper storage, use, and clean-up.

## Chemical Storage

All chemicals, cleaning utensils, equipment, and required PPE approved by the FST will be stored in a secured, limited-access area segregated from each warehouse's general freight storage area. A member of the facility's management will inventory the storage area at regular intervals to ensure proper storage methods are being used and that sufficient PPE is on hand for use and cleanup.

## Safe Handling Procedures

The FST will develop an SHP for each new chemical introduced to the GWSI facility. The facility manager will be responsible for training employees and retaining those training records on any new procedures or guidelines required from introducing a new chemical.

The SHP will include:

- Proper techniques for storage, usage, clean up, and disposal
- PPE required and proper usage
- Emergency procedures include:
  - Spill response and cleanup procedures
  - Exposure-response plan for employees, including first aid and reporting
  - An exposure-response plan for freight includes cleanup, segregation, and reporting.

## Incident Reporting and Investigation

Any incidents involving spills or exposures should be immediately reported to the facility manager for investigation. The facility manager will collect all pertinent data to submit to the FST, along with a summary of the incident and any available photos. The FST will review the report to determine what if any, corrective action is to be taken.

If the FST determines a corrective action is warranted, they will carefully detail it to the facility manager for implementation. The FST will then follow up with the facility manager at a predetermined interval to ensure that the corrective action has been implemented, a record of the staff member(s) involved in the corrective action has been retained, and that it has effectively addressed the incident's root cause.

## **Program Review and Improvement**

The FST will review the Chemical Control Program annually or when company growth or new chemical introduction warrants a full audit of the program's practices to ensure safe chemical storage and handling is maintained throughout GWSI.