

Compliance

- Failure to comply with an Administrative Standard, without an approved deviation, may result in a hazardous situation which could result in:
 - Personnel injury or death
 - Harm to the environment
 - Equipment or property damage.
 - Failure to comply with an Administrative Standard, without an approved deviation, may result in disciplinary actions.
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Roles and Responsibilities

The following individuals and groups have the following roles and responsibilities:

- | | |
|--|---|
| Document Owner | <ul style="list-style-type: none">• Ensures this document is reviewed according to the required revision cycle.• Ensures the document is updated to accommodate changes to Suncor, provincial, and federal regulation.• Ensures the document is updated to mitigate risks found as the result of an incident. |
| Document Approver | <ul style="list-style-type: none">• Ensures this standard is necessary and that it aligns with management and company direction. |
| Oil Sands and In Situ Line Management | <ul style="list-style-type: none">• Ensures the implementation and adherence to this standard. |
| Requestor | <ul style="list-style-type: none">• Responsible for contacting appropriate SCM personnel to have MDCR form completed• Submitting a current MSDS with the MDCR form. |
| Supply Chain Management | <ul style="list-style-type: none">• Responsible for completing and submitting the MDCR form. |
| Product Safety | <ul style="list-style-type: none">• Development and maintenance of MSDS for all Suncor Energy Inc., Upstream product streams, intermediate streams and waste streams. |
| Environmental Affairs | <ul style="list-style-type: none">• Approval or rejection of all products submitted for approval. |
| Industrial Hygiene | <ul style="list-style-type: none">• Approval or rejection of all products submitted for approval.• Maintain a central copy of all MSDS for all controlled products used on site. |
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References

- Alberta Occupational Health and Safety Code, Part 29, 2009
 - Federal Hazardous Products Regulations SOR/ 2015-17

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Terms, Definitions and Acronyms The following terms, definitions and acronyms are used in this standard:

Transfer Point	is a point where a worker will come into contact with a controlled product on a routine basis and will include sample points, drains, dispensing nozzles, coker heads, and PSV discharges.
Controlled Product	a product, material or substance specified by the regulations made under paragraph 15(1)(a) of the <i>Hazardous Products Act (Canada)</i> to be included in any of the classes listed in Schedule II of the <i>Hazardous Products Act (Canada)</i> .

Standard

1. Planning

Note: Before any chemical product can be used at Upstream sites, the individual responsible for the use of the material must consider several factors.

Item	Description
1.1	Review MSDS or SDS system to determine if the product has already been approved for use on the specific Upstream site in which the product will be used or if a similar product that suits the application has already been approved. If the product is already approved for use on the specific Upstream site, the material can be ordered.
1.2	Ensure that the material does not contain a high risk substance. Materials containing a high risk substance will be rejected for use on site. The effort to identify a substitution or alternative product that suits the application shall be made. A list of high risk substances is listed in Appendix 1. If a substitution or alternative product is not available, the material containing a high risk substance will be approved for a temporary and restricted use (use condition specified by EHS approver).
1.3	Evaluate the toxicity, reactivity, flammability and incompatibility of the material and consider using a less hazardous material.
1.4	Determine need for a hazard analysis, risk review or any other relevant risk assessment tool.
1.5	Ensure that adequate control measures are in place to protect workers handling the material(s) or workers that may be potentially exposed to the material(s).
1.6	Identify the environmental aspects that could impact air, land or water and ensure controls are implemented to reduce or eliminate the environmental aspects.
1.7	Identify the potential for creation of a waste material during the life cycle of the product on site. Ensure that the waste material can be properly disposed before bringing the original product on site.

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2. Acquisition of Chemical Products

Item	Description
2.1	If the material is not already approved for use at Upstream sites, the following process must be utilized to get it approved.
2.2	Requestor must initiate a request for a Master Data Create Request (MDCR) form with Supply Chain Management (SCM) for any new EHS relevant products to be brought onto site. The following positions can access the MDCR form: <ul style="list-style-type: none">• Logistics Scheduler• Logistics Planner• Buyer• Strategic Buyer• Contract Administrator• EPC Buyer• Warehouse Planner• Warehouse Scheduler• Material Requirements Planning Controller
2.3	If the material is considered EHS relevant, there is an additional section of the MDCR form that must be completed at the time of request. The decision tree to determine if a product is EHS relevant is shown in Appendix 2. A list of prohibited substances is provided in Appendix 1. A copy of the latest MSDS or SDS for the EHS relevant material must be attached to the MDCR form. This form is then submitted to the MSDS Administrator to initiate the approval process.
2.4	The MSDS Administrator will review the MSDS or SDS, develop a coversheet and enter data into the electronic system. The MSDS Administrator will then inform the Industrial Hygienist and Environmental Specialist that information has been entered. The Industrial Hygienist and Environmental Specialist will then approve or reject use of that material on site.
2.5	When the approval process is complete, the MSDS Administrator releases the MSDS on the portal and a notification e-mail is sent to the requestor. Until the MSDS is released, the material cannot be ordered by Suncor personnel or brought on to site.

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3. Labelling

Note 1: Proper labeling of hazardous materials is necessary to ensure that workers are warned of the hazards. Regulatory requirements for labeling are outlined in Part 29, of the Occupational Health and Safety Code and Hazardous Products

Note 2: Regulations (WHMIS 2015). Listed below are the three types of labels that are found.

	Item	Description
Supplier Labels	3.1	Any controlled product from a vendor must have a supplier label affixed to the container that meets the minimum requirement as outlined in section 398 in Part 29 of the Alberta Occupational Health and Safety Code. Bulk chemical shipments that do not have a supplier label affixed to the container must be accompanied with an SDS or MSDS and have a worksite label applied to the container after receiving.
Worksite Label/Tag	3.2	Information that must be on a worksite label or tag includes the following: Product Name, WHMIS symbol, required Personal Protective Equipment and a reference to the SDS or MSDS. An example of a Worksite Label/Tag is given in Appendix 3.
	3.3	Worksite Labels/Tags must be affixed to controlled products in following situations: <ul style="list-style-type: none"> • Controlled product is decanted from supplier container into another container, such as mixing tank, bucket, etc. • Existing supplier label is missing, damaged or has become illegible • Containers of manufactured product used on site • Transfer points on vessels, storage tanks and process piping
Product Name Only	3.4	The following need to be legibly identified with the Product Name only: <ul style="list-style-type: none"> • Process stream samples • Pits, ponds, sumps • Laboratory chemicals transferred from supplier container • Sample containers being analysed in the laboratory • Controlled product is transferred from a labelled container to a portable container and the entire amount of controlled product is for immediate use.
(Material) Safety Data Sheet (SDS)	3.5	Any material classified as a controlled product must have an SDS or MSDS available on site prior to manufacture or prior to being brought on site. All MSDS will be available for viewing electronically via SAP. Industrial Hygiene maintains memory/USB sticks with updated MSDS/SDS

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Responsibility	Step	Action
	3.6	Products that are manufactured/blended at Suncor Energy Inc., shall have a SDS developed prior to manufacture/blending or as soon as possible after manufacture/blending. Materials that require development of a SDS include product streams, intermediate streams and waste streams. The SDS shall be updated when new hazard information is available or every three years, whichever comes first. The SDS for manufactured products shall be sent to all customers on or before the date the material is shipped. Updated SDS shall be sent to customers when new hazard information is available, every three years, or when customer requests one, whichever comes first.
	3.7	Any controlled product from a vendor must have an SDS or MSDS available in the electronic system before it can be brought on site. The process to obtain approval for use on site is outlined in Major Step 2 Acquisition of Chemical Products.

4. Training

Note: Workers required to work with or near a controlled product must receive training on the following:

Item	Description
4.1	Purpose and significance of supplier and/or worksite labels
4.2	Purpose and significance of information on SDS or MSDS
4.3	Procedures on safe handling, use and storage of controlled products
4.4	Procedures to be followed if there are fugitive emissions
4.5	Emergency response procedures

5. Exceptions

Item	Description
5.1	Pharmaceutical products and pesticides regulated under the Alberta Environmental Protection and Enhancement Act Schedule 1 and 2 are exempt from the requirements of this standard. Although these materials are exempt from the standard, prudent practice would be to submit the materials(s) for approval to ensure relevant hazard information is available to users of the material.

End of Standard

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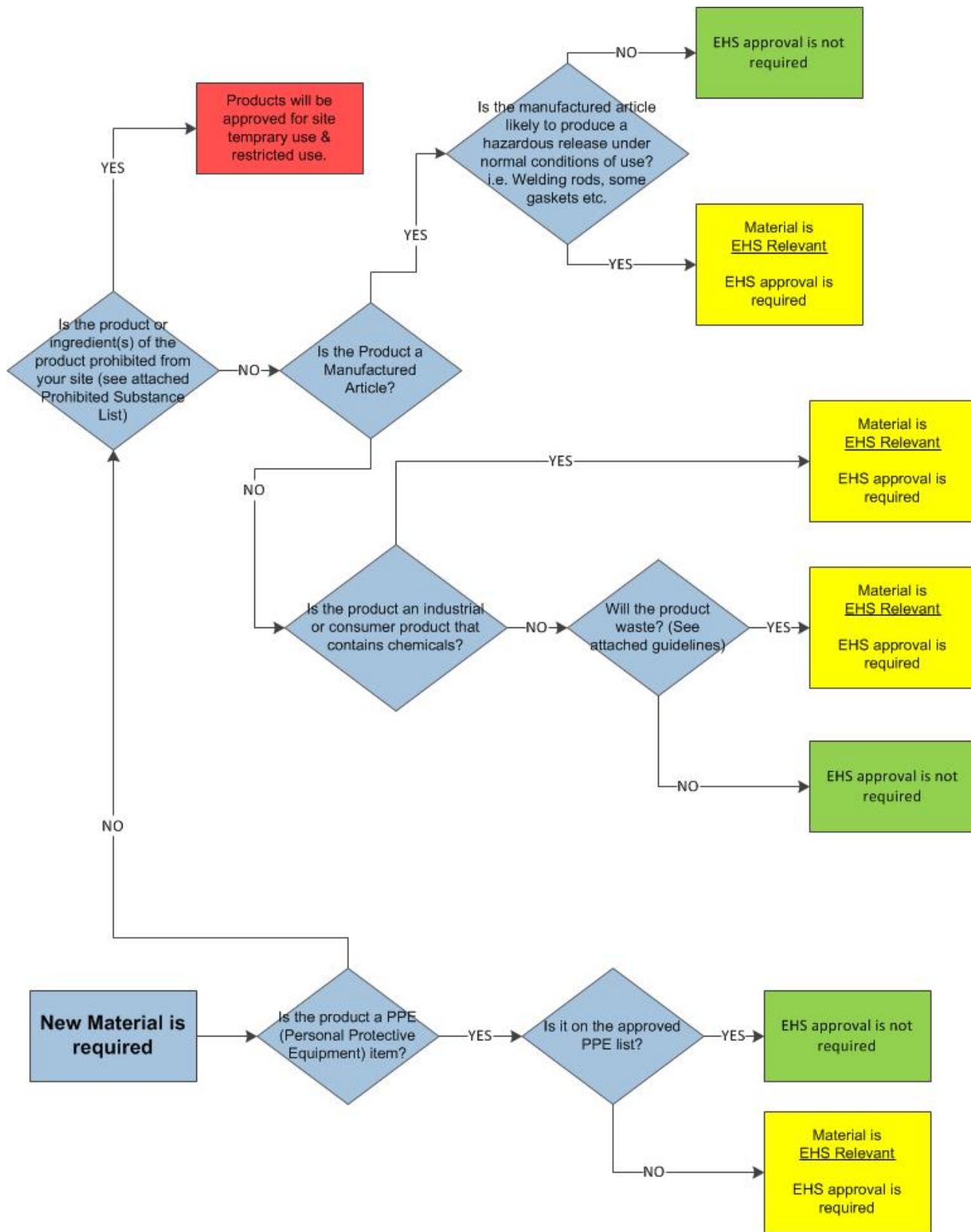
Appendix 1 – Prohibited Substances

- Asbestos
- Benzene
- Beryllium
- Ethylene Oxide
- Isocyanates
- Lead Paint
- Methylcyclopentadienyl Manganese Tricarbonyl
- Reproductive hazards (to be evaluated by EHS Approver)

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Approved By: Sheila Chernys, Director, OS Environmental & Regulatory

Appendix 2 – EHS Relevant Decision Tree



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Appendix 3
WHMIS 1988 Label



Worksite Label/Tag - Blank



Worksite Label/Tag - Completed Example

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The following individuals have approved and signed this document.

UserName: Sheila Chernys (schernys)

Title: Dir OS Enviro & Reg

Date: Tuesday, 23 August 2016, 03:15 PM Mountain Time

Meaning: Approver 1 Signed

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