




Sterling Chemical Malta Ltd

ENVIRONMENTAL INSTRUCTION: DANGEROUS GOODS MANAGEMENT

REVISION HISTORY

Revision Date	Revision Number	Sections Affected	Change description
01.03.2014	00		First issue

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1. PURPOSE

The purpose of this procedure is to take appropriate measures with regard to the nature and extent of foreseeable dangers during goods transportation activity, in order to avoid damages or injuries and, if necessary, to minimize their effects.

2. SCOPE

This procedure applies to activities that lead to the handling of dangerous goods as classified and regulated by the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). This procedure is about

- Operator's safety obligations
- classification of dangerous substances in relation to road transportation;
- standards and tests that define the classification of individual substances as dangerous;
- goods packaging conditions as well as packaging and containers characteristics;
- methods of construction and loading of vehicles and tanks;
- requirements for means of transport, including travel documents
- procedures of shipping, handling, loading and unloading of goods

3. REFERENCE DOCUMENTS

Reference documents to better implement and comprehend this procedure are the followings:

- Regulation UNI EN ISO 14001 – Requirements and use guide (section 4.3.2);
- Regulation UNI ISO 14004 – General guide lines on support principles, systems and techniques (section 4.3.3.3).
- Regulation OHSAS 18001 (section 4.4.6) - Management systems of safety and health at work.
- Register of environmental, health and safety laws and, **MRA_4.5.1-1 and MRS_4.5.1-1**, it is an updated list of all the major laws and regulations relating to the organization activities.
- Evaluation register of compliance with legal requirements (**MRA_4.5.1-2** relating to the environment and **MRS_4.5.1-2** for health and safety)
- ADR regulations in force.

4. DEFINITIONS

To better comprehend the instructions provided by this procedure, please use the following definitions:


ADR: European Agreement concerning the International Carriage of Dangerous Goods by Road

Shipper: The company that

- a) loads packaged dangerous goods, small containers or mobile tanks on a vehicle or container;
- b) It loads a container, a container for carriage in bulk, a CGEM, a tank-container or a portable tank on the vehicle;

Total load: each load from a single consignor who has the exclusive use of the vehicle and for which all loading and unloading operations are carried out in accordance with the consignor or consignee's instructions;

Maximum admissible load: maximum net mass that the IBC is designed and authorized to carry;

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Package: the final product of packing operation, consisting of packaging or large packaging, with its content that is ready to be shipped. The term includes receptacles for gases as well as objects, which due to their size, mass or configuration can be carried unpackaged or with lashings, cages or handling devices.

Addressee: the Company that takes over the management of incoming dangerous goods;

Large packaging: a packaging consisting of an outer packaging which contains articles or inner packagings and which has a net mass of more than 400 kg, or a capacity exceeding 450 litres, but its content does not exceed 3 cubic metres of volume;

Packaging: one or more receptacles and any other components or materials necessary to enable recipients to carry out their retaining and safety functions;

Combined packaging: a combination of packagings for carriage, consisting of one or more inner packages placed in an outer packaging;

Group of packaging: a group in which certain products are packed according to the level of danger that they represent for carriage;

ONU or UN Number: the four-digit identification number of materials and objects, extracted from the UN standard Regulation;

Packer: the company that fills packagings with dangerous goods, including large packagings and prepares packages to be carried;

Unloading clerk: the company that unloads packaged dangerous goods, small containers or portable tanks from a vehicle or a container;

Over-packaging: a wrapping used to contain one or more packages in order to ease their handling and stowage during carriage. For example a loading tray, like a pallet, on which several packages are placed or stacked and secured by a plastic strip, a thermoplastic or stretch film or using other appropriate tools;

Consignor: the company that sends dangerous goods for its own or on behalf of third parties;


5. RECIPIENTS

This procedure addresses to:

- All production operators involved in shipment, loading and unloading and packaging operations;
- All warehousemen involved in shipment, loading and unloading and packaging operations;
- Operators responsible for waste management;
- The responsible for waste documents management;

6. SAFETY OBLIGATIONS PURSUANT TO AND IN ACCORDANCE WITH ADR 1.4

The activity related to waste management and disposal sets different operations to be carried out within the plant perimeter. Such actions are considered and ruled by ADR regulation, so operators in charge of waste management have to respect the following rules for a good behaviour.

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A. CONSIGNOR

Dangerous goods consignor is required to prepare a charge to be shipped that complies with ADR regulations. In particular he has to:

- Make sure that dangerous goods are classified and authorized for carriage in accordance with ADR;
- Provide the carrier with information, data, carriage documents (FIR) and the required accompanying documents (authorizations, approvals, notifications, certificates, safety data sheets), by paying close attention to what arranged in the operative instruction **MIOA_4.4.6-N1 "Marking , labelling and packaging in accordance with ADR regulation"**
- Use only packagings, large packagings, medium containers for carriage in bulk and tank-vehicles or portable tanks approved and suitable to carry the materials in question with markings prescribed by ADR;
- Comply with the instructions related to forwarding procedure and shipment restrictions;
- Ensure that also empty not cleaned and not degassed tanks, or not cleaned, vehicles for the carriage in bulk, are marked and plated in accordance with ADR. He also has to ensure that empty and not cleaned tanks, are closed and have the same tightness they had when were full.
- Ensure that vehicles are not overloaded;
- Make sure vehicles are provided with plates and markings prescribed for vehicles themselves;
- Make sure the equipment prescribed in written instructions for the driver is on board

The responsible, in terms of control, is the operator who dispatches goods...

B. LOADING CLERK


During the loading phase he has to respect the following obligations:

- he has to deliver dangerous goods to the carrier only if they are authorized for carriage in accordance with ADR;
- He has to check if the packaging is damaged, especially if it is not leakage-proof any more. He has to checks if there are any leakages or if there is a possibility of a leakage of dangerous substances. He cannot load until the damage is not repaired. The same is true for not cleaned packagings.
- When loading dangerous goods in a large container onto a vehicle he has to comply with the requirements concerning goods loading and handling established in the operative instructions **MIOA_4.4.6-A1 "Assignment of liquid waste to transport companies"** and **MIOA_4.4.6-N2;**
- After loading dangerous goods he has to comply with the requirements concerning warning signs established by ADR;
- When loading packages, he has to respect prohibitions on mixed cargo (loading of different products on the same vehicle) by taking into account all dangerous goods already loaded on it.

C. PACKER

Packing must be done by respecting the following obligations:

- Provisions concerning conditions on mixed packaging (packaging of different products together) specified in **MIOA_4.4.6 _N2;**

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- Provisions concerning markings and warning labels on packages, packagings, large packagings and over-packagings. It is possible to find the instructions in **MIOA_4.4.6-N1**.

D. UNLOADING CLERK

Unloading clerk has to:

- Make sure goods correspond with those that have to be unloaded by comparing the relevant information on the transport document with the information about packages, containers, tanks;
- Before and during unloading operations he has to check if packagings, the tank, the vehicle or container have been damaged so that they could endanger the unloading operation itself. In this case, he has to make sure unloading operation is not brought to completion until appropriate measures are not taken;
- Immediately after unloading the tank, the vehicle or container:
 - i. He has to remove any dangerous residue stuck to the outer part of the tank, the vehicle or container during unloading operations;
 - ii. He has to ensure valves and inspection holes are closed;
- When vehicles are unloaded he has to make sure they do not show any warning labels required by law.

E. Operator's mandatory training

Employees must be trained in accordance to 1.3.2 before taking their responsibilities. As far as those operations that still not require a specific training, these have to be carried out only under the supervision of a trained person. Training is necessary after any regulations change and at least every two years (when ADR amendments are released)

7. RESPONSIBILITY

Sterling Chemical Malta Ltd has the responsibility to prepare a correct shipment as far as goods documents, by providing adequate indications on how waste packaging must be done. Operators involved in waste management operations have the responsibility to properly carry out loading operations of waste. Warehousemen have the responsibility to correctly carry out the unloading operations of dangerous goods ADR classified. ADR Consultant has the responsibility to make sure execution stages are correctly carried out, also through internal audits.

Procedures and operating instructions have to be compulsory reviewed every two years when the sector regulation is updated.