



Euro Chlor
representing the chlor-alkali industry

Audit Questionnaire Mercury

Health 6

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EURO CHLOR PUBLICATION

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Euro Chlor

Euro Chlor is the European federation which represents the producers of chlorine and its primary derivatives.

Euro Chlor is working to:

- improve awareness and understanding of the contribution that chlorine chemistry has made to the thousands of products, which have improved our health, nutrition, standard of living and quality of life;
- maintain open and timely dialogue with regulators, politicians, scientists, the media and other interested stakeholders in the debate on chlorine;
- ensure our industry contributes actively to any public, regulatory or scientific debate and provides balanced and objective science-based information to help answer questions about chlorine and its derivatives;
- promote the best safety, health and environmental practices in the manufacture, handling and use of chlor-alkali products in order to assist our members in achieving continuous improvements (*Responsible Care*).

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Prior to 1990, Euro Chlor's technical activities took place under the name BITC (Bureau International Technique du Chlore). References to BITC documents may be assumed to be to Euro Chlor documents.

RESPONSIBLE CARE IN ACTION

Chlorine is essential in the chemical industry and consequently there is a need for chlorine to be produced, stored, transported and used. The chlorine industry has co-operated over many years to ensure the well-being of its employees, local communities and the wider environment. This document is one in a series which the European producers, acting through Euro Chlor, have drawn up to promote continuous improvement in the general standards of health, safety and the environment associated with chlorine manufacture in the spirit of *Responsible Care*.

The voluntary recommendations, techniques and standards presented in these documents are based on the experiences and best practices adopted by member companies of Euro Chlor at their date of issue. They can be taken into account in full or partly, whenever companies decide it individually, in the operation of existing processes and in the design of new installations. They are in no way intended as a substitute for the relevant national or international regulations which should be fully complied with.

It has been assumed in the preparation of these publications that the users will ensure that the contents are relevant to the application selected and are correctly applied by appropriately qualified and experienced people for whose guidance they have been prepared. The contents are based on the most authoritative information available at the time of writing and on good engineering, medical or technical practice but it is essential to take account of appropriate subsequent developments or legislation. As a result, the text may be modified in the future to incorporate evolution of these and other factors.

This edition of the document has been drawn up by the Health Working Group to whom all suggestions concerning possible revision should be addressed through the offices of Euro Chlor.

TABLE OF CONTENTS

INTRODUCTION	5
1. ORGANISATION AND MANAGEMENT	6
2. HEALTH HAZARD OF MERCURY	7
3. PERSONNEL HYGIENE STANDARDS	8
4. BIO-MONITORING OF MERCURY EXPOSURE	9
5. MONITORING OF MERCURY IN THE WORKING ENVIRONMENT	10
6. RISK ASSESSMENT	11
7. RISK MANAGEMENT	12
8. HEALTH SURVEILLANCE	13
9. HEALTH-RELATED ACTIONS IN CASE OF OVER-EXPOSURE	14
10. INFORMATION AND TRAINING FOR EMPLOYEES	15
11. RECORDS	16
12. INTERNAL AUDIT	17
REFERENCES	18

INTRODUCTION

Health awareness within Chlor-Alkali industry is a significant part of its sustainable development. In this frame, it has been decided to provide audit questionnaires to contribute to the process of continuous improvement.

The purpose of this document is to produce a self-assessment guideline to evaluate the health risk management performance of a Chlor-Alkali plant with regard to mercury. This paper can be also used for external audits. It should include both workers and contractors conditions.

This document is derived from the Chemical Industry Association (CIA) document section 6 "Occupational Health Information – Check –up", and was adjusted in a way to that it can be used for mercury hazard situation.

The requirements for an appropriate health policy are based on the Euro Chlor recommendation:

- ***HEALTH 2 - Code of Practice: Control of Worker Exposure to Mercury in the Chlor-Alkali Industry***
- ***Env Prot 11 - Code of Practice - Mercury Housekeeping***
- ***National legislation for some aspects.***
- ***Company documents in native language in accordance with Health 2***

For each question, 4 answers are proposed:

- ❖ Answer a: minimal situation or at least 2 non-conformities to the reference document(s)
- ❖ Answer b: one non-conformity to the reference document(s) or several remarks
- ❖ Answer c: full compliance to the reference document(s)
- ❖ Answer d: extra work going beyond all the requirements of the reference document.

It is necessary to add comments for every question so that more justification can be discussed, especially for replies a, b and d.

1. ORGANISATION AND MANAGEMENT

a	b	c	d
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reference document:

➤ ***National regulations***

- a. No written Occupational Health policy regarding mercury
- b. Regarding Occupational Health, persons are nominated responsible and reports are written. Nothing is formally recorded
- c. Occupational Health policy and responsibilities regarding mercury written and all employees informed
 - ❖ Persons nominated and tasks delegated in writing
- d. In addition to c), some extra-work e.g.:
 - ❖ Reports used in the assessment of the quality management
 - ❖ Policy and practice subject to review at appropriate intervals.

Comments:

2. HEALTH HAZARD OF MERCURY

a	b	c	d
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reference documents:

- ***HEALTH 2 - Code of Practice: Control of Worker Exposure to Mercury in the Chlor-Alkali Industry***
- ***National regulations***
 - a. No document written
 - b. Document available for managers at least
 - c. Document regularly updated and used in training of workers
 - d. In addition to c), some extra-work e.g.:
 - ❖ Document used in information for visitors

Comments:

3. PERSONNEL HYGIENE STANDARDS

a	b	c	d
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reference documents:

- **HEALTH 2 - Code of Practice: Control of Worker Exposure to Mercury in the Chlor-Alkali Industry**
- **Env Prot 11 - Code of Practice - Mercury Housekeeping**
- **National regulations**

- a. Only informal recommendations given, nothing written
- b. Written hygiene standards
 - ❖ Assessment not fulfilling the requirements of Health 2
- c. Written hygiene standards according to Health 2
 - ❖ Training in housekeeping available and applied
- d. In addition to c, some extra-work e.g. :
 - ❖ Hygiene management system regularly audited and updated

Comments:

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