

# PCP Sample Answers



## Poisons Control Plan (PCP) for a **Permit** to Purchase or Obtain Poisons or Controlled Substances – **Part One** – **Sample Answers**

### 1. The Permit

#### Location of documents

##### *1.1 Indicate where the permit document is to be located;*

- Displayed in the office area.
- Filed in the office of the Laboratory Manager.

##### *1.2 Indicate where the approved version of the Poisons Control Plan is to be located;*

- In a clearly marked file in the office of the Laboratory Manager.

##### *1.3 Indicate the position (or role) of the person(s) to be responsible for the periodic review of the approved Poisons Control Plan and the frequency with which the review is to occur;*

- The General Manager is required to review the PCP at least annually and to submit any proposed amendments, to the Department, for approval.

##### *1.4 Indicate the manner in which the review of the PCP is to be documented and where the corresponding records are to be retained;*

- The (DHS approved) copy of the PCP is to be retained, in a clearly marked folder, with the date of review and the signature of the reviewer to be clearly recorded on each occasion.

## Purpose for which poisons are required

### *1.5 Indicate the type(s) of activities for which the permitted poison(s) may be required;*

- Metallic cyanides (S7) are required for the preparation of cyanide solutions for electroplating purposes.
- Copper chrome arsenate (S7) is required for use in the timber treatment plant.
- Antibiotic substances (S4) are required for the preparation of test media for use in the microbiology laboratory.
- Limited quantities of a wide range of Schedule 4 substances are required for use in the preparation of standards in the analysis of environmental samples.
- Veterinary therapeutic substances (S4) are required for administration to animals for research and treatment purposes.
- Metallic cyanides (S7) are required for treating and cleaning precious metals in the manufacture of jewellery.
- Arsenic trioxide (S7) is used, as a termiticide, by licensed pest control operators.
- A range of substances (S4 and S7) is used as reagents and analytical standards in a research laboratory (indicate the general nature of the research).
- A limited number of Schedule 8 and 9 poisons are required for use in the preparation of standards for quantitative analysis in drug testing procedures.

## 2. Reference Material

### *2.1 Indicate whether a copy of the SUSDP is held and where it is to be located;*

- A copy of the SUSDP is held by the Laboratory Manager.
- SUSDP is not held.

### *2.2 Indicate where The Act and The Regulations are to be accessed or located;*

- Copies of The Act and Regulations are held by the Regulatory Affairs Officer
- Copies of The Act and Regulations are not held but may be accessed on the Internet if required.

## 3. Purchasing

### *3.1 Indicate how poisons may be purchased or obtained in addition to the position(s) or role(s) of the person(s) to be responsible for ordering;*

- All purchases must be approved by the Laboratory Manager or Supervisor.
- Staff members will be required to generate requisition forms, to be forwarded to the Purchasing Department, for review by and approval of the Purchasing Manager.

### *3.2 Indicate what records are to be retained in relation to the acquisition of poisons;*

- Records of all purchases are to be retained, for a period (specify), on a computer database.
- Copies of all invoices are to be retained for a period (specify).

## **4. Security & Storage**

### *4.1 Indicate what security measures are applicable to the premises;*

- High perimeter fence with barbed wire on top and lockable gates
- Deadlocks on all external doors
- After hours patrols by contracted security company
- Monitored alarm system with infra-red and movement detectors
- Audible alarm system
- Cleaning staff will not have access to areas in which poisons are to be stored

## **Schedule 4 poisons [if any]**

### *4.2 Indicate how Schedule 4 poisons are to be stored;*

- S4 poisons are to be stored in a lockable metal cabinet / lockable storeroom.

### *4.3 Indicate how unauthorised or unsupervised access is to be prevented;*

- The key(s) to the storeroom/cabinet is to be held on the person of Laboratory Manager / Laboratory Supervisor(s).
- Access to the storage area is to be restricted to employees who have been issued with a personalised electronic access card.
- The cabinet is to be locked except when opened to access chemicals

## **Listed Regulated poisons in Schedule 7 [if any]**

### *4.4 Indicate how Listed Regulated poisons in Schedule 7 are to be stored;*

- Cyanide is to be stored in a padlocked metal cabinet with prominent warning signs.
- Arsenic trioxide is to be stored in a locked cupboard, which is fixed to the wall, except when carried, for use in the field, in a locked metal container.
- The key to the storage facility is to be kept on the person of the Responsible person and/or the Production Manager/Supervisor.

## **Special storage facilities [if any]**

### *4.5 Indicate what special storage facilities (if any) are to be used for specific poisons;*

- A locked refrigerator is to be used for poisons requiring refrigeration.
- A separate lockable cabinet is to be used to isolate carcinogenic substances from other chemicals. This cabinet is to be clearly identified with warning signs and the key is to be accessible to a limited number of Designated Persons.

## 5. Records of Transactions

### *5.1 Indicate how records of transactions are to be retained;*

- Computerised records are to be used to detail all transactions, relating to S4 poisons, with back-up copies stored off-site.
- A bound book is to be used to chronologically record the use of all Schedule 4 poisons.
- A file card system is to be used to record the use and remaining balance of all Schedule 4 poisons.
- A logbook is to be used to record details of cyanide used in the replenishment of electroplating tanks.

## 6. Staff Training

### *6.1 Indicate how staff training and information are to be provided to employees;*

- Relevant staff members are to be personally instructed by experienced personnel and supervised until a satisfactory level of competence is achieved.
- Formal training classes are to be conducted initially with all staff involved in an annual review.
- All procedures are to be documented, in accordance with Worksafe procedures, with staff members instructed in the implementation of those procedures.

### *6.2 Indicate what specific first aid arrangements are to be implemented in relation to specific poisons;*

- Antidotes kit is prominently located in the area in which the poisons are to be used.
- Details of steps to be taken, in the case of a poisoning or other exposure, are clearly posted in the area in which poisons are to be used.
- Self-contained breathing apparatus and fully enclosed body suits are available for dealing with emergency spills, of carcinogenic material, and for maintenance work on the treatment plant.
- Safety showers and eye wash facilities are readily available for emergency use.

### *6.3 Indicate how safety equipment and first aid facilities are to be maintained;*

- Periodic (specify frequency) review of relevant facilities by the designated Occupational Health and Safety Officer.
- Annual servicing of equipment by contracted service providers.

## 7. Waste Disposal

### *7.1 Indicate the means of disposal of such waste material [if any];*

- Expired Schedule 4 poisons are sent for high temperature incineration.
- Waste material, which may contain precious metals, is returned to the supplier for reclamation/recycling.
- Other waste material is collected periodically by contract carriers.