



U. S. Chemical Safety and Hazard Investigation Board RECOMMENDATIONS STATUS CHANGE SUMMARY

Report:	Improving Reactive Hazard Management
Recommendation Number:	2001-1-H-R16
Date Issued:	October 8, 2002
Recipient:	National Association of Chemical Distributors
New Status:	Closed- Acceptable Action
Date of Status Change:	March 11, 2014

Recommendation Text:

Expand the existing Responsible Distribution Process to include reactive hazard management as an area of emphasis. At a minimum, ensure that the revisions address storage and handling, including the hazards of inadvertent mixing of incompatible chemicals.

Board Status Change Decision:

A. Rationale for Recommendation

In 2000, following the investigation of a devastating incident at Morton Industries, the CSB commenced a study on reactive hazards and best practices for reactive hazard management. In total, the CSB identified 167 serious accidents in the United States between 1980 and 2001; 48 of these accidents resulted in 108 fatalities. In addition, more than half of these incidents involved chemicals not covered by existing Occupational Safety and Health Administration (OSHA) or Environmental Protection Agency (EPA) standards. While the bulk of incidents were in the chemical manufacturing industry, thirty percent occurred at industrial facilities that use or consume chemicals in bulk quantities.

As part of its investigation, the CSB reviewed voluntary industry initiatives, including the American Chemistry Council's Response Care Program and the National Association of Chemical Distributors' Responsible Distribution Process, and issued recommendations to these groups to provide increased guidance on reactive hazards.

The National Association of Chemical Distributors is a trade organization of chemical distribution companies that purchase and take title of chemical products from manufacturers. Member companies process, formulate, blend, repackage, warehouse, transport, and market chemical products to industrial customers. Adherence to the requirements of NACD's environmental, health, safety and security program, Responsible Distribution Process (RDP), is a mandatory requirement for all NACD members. Members must undergo two initial third-party audits to confirm their adherence to RDP policies and procedures; audits are repeated at every three years.

B. Response to the Recommendation

Pursuant to the CSB's recommendation, the NACD made revisions to the Handling and Storage portion of its Responsible Distribution Code of Management Practice to obligate member companies to provide guidance and information to customers, warehouses, terminals, and/or carriers on "a process to increase awareness of hazards from mixing incompatible materials" and to "define procedures for loading and unloading chemicals at the

member company's facilities, and where appropriate, the filling of containers, that will result in...an increased awareness of hazards from mixing incompatible materials." NACD also conducts verification audits to ensure continued member compliance with these requirements.

NACD also released a guidance document to assist its member companies in improving reactive hazard management. The document provides an overview of the CSB's findings on reactive hazards, provides guidance for implementation of the new Responsible Distribution requirements, and also provides an "actions steps checklist for addressing reactive hazards management requirements under the Responsible Distribution Process." This document is available to NACD members, and a recent letter from NACD's Vice President of Responsible Distribution indicates that NACD plans to update the document.

NACD also provided the CSB with examples of ways in which members have translated Responsible Distribution requirements and NACD guidance into policies and practices related to the management of reactive hazards and indicated plans to provide training relevant to this topic.

C. Board Analysis and Decision

Based on the actions reported by NACD, the Board voted to change the status of CSB Recommendation No. 2001-1-H-R16 to: "Closed- Acceptable Action."