



# **CSB Reactive Hazards Study**

# Survey of Industry Practices

The CSB is updating its 2002 Reactive Hazard Management Study. As part of this process, the CSB will be submitting the below survey to OMB for review. Interested persons are invited to submit comments regarding this proposal. When commenting on the proposed information collections, please reference the document identifier or OMB control number. To be assured consideration, comments and recommendations must be received by the OMB desk officer via one of the following transmissions within 30 days of publication of this notice: OMB, Office of Information and Regulatory Affairs, Attention: Chemical Safety Board Desk Officer, Fax Number: (202) 395-5806 *OR*, Email: *OIRA submission@omb.eop.gov.* 

#### **BACKGROUND**

The United States Chemical Safety and Hazard Investigation Board (CSB) is surveying chemical manufacturers with the goal of examining industry practices on the topic of reactive hazard safety and management. Your company/facility was randomly selected to participate in a survey of industry practices involving the evaluation and management of risks associated with storing, handling, and processing chemicals prone to reactivity.

The CSB is an independent federal agency whose statutory mandate is to investigate incidents/accidents at stationary sources (fixed facilities) that result in both a release of an extremely hazardous substance (or regulated substance) into the atmosphere, and a fatality, serious injury, or substantial property damages. The CSB also promotes the prevention of major chemical incidents/accidental releases at industrial facilities. The CSB is a scientific investigation organization. The CSB's principal roles are to investigate accidents at fixed facilities, determine the conditions and circumstances that led up to an event, identify the causes, issue safety recommendations, study chemical safety issues, and evaluate the effectiveness of governmental policies and actions involved with industrial chemical safety.

Occasionally, while conducting incident investigations, the CSB is alerted to significant safety problems that exceed the scope of any one particular investigation. As a result, the CSB conducts

<sup>&</sup>lt;sup>1</sup> 42 U.S.C. 7412(r)(6)(C)

<sup>&</sup>lt;sup>2</sup> 42 U.S.C. 7412(r)(2)(A)

a hazard investigation or safety study to better understand the nature and causes of more pervasive and systemic safety problems. To update the 2002 report, "Improving Reactive Hazard Management," the CSB has contracted with the Federal Research Division (FRD), a research and analysis unit within the Library of Congress, to conduct a new hazard investigation of reactive chemical process safety. This study will include a number of different research tasks, including this survey, which will be similar to the one used in the CSB's 2002 report. Survey responses will be used to examine industry practices associated with the prevention of reactive chemical incidents.

#### OVERVIEW OF REACTIVE CHEMICAL HAZARD STUDY

This updated reactive chemical hazard study (1) reviews and evaluates historical trends involving reactive chemical incidents, and (2) examines industry practices associated with the prevention of reactive chemical incidents.

The objectives for the new hazard study include:

- 1. Determining the historical trends and impacts of recent reactive chemical incidents;
- 2. Examining how industry, OSHA, and EPA currently address reactive chemical hazards;
- 3. Determine the differences, if any, between small/medium and large companies with regard to reactive chemical policies, practices, in-house reactivity research, testing, and process engineering; and
- 4. Developing recommendations for reducing the number and severity of reactive chemical incidents.

The recommendations from the hazard investigation may take a variety of forms, and these would not necessarily be recommendations for regulatory action. The CSB has, in the course of previous investigations, urged industry associations and companies to address numerous safety concerns through a variety of nonregulatory actions.

The FRD, on behalf of the CSB, is conducting a voluntary survey of companies concerning industry practices involving hazardous reactive chemicals and reactive chemical incidents. You may find the following definitions helpful in understanding the scope of the survey.

#### **Reactive Hazard**

The CSB is aware that industry uses a variety of ways to classify/evaluate the chemical reactivity of a substance; however, for this survey, the CSB broadly defines a reactive chemical hazard as:

A situation with the **potential** for an uncontrolled chemical reaction that can result in harm to people, property, or the environment, through the release of heat, energy, or hazardous byproducts.

For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

#### **SURVEY INSTRUCTIONS**

The purpose of the survey is to identify the range of practices in place in industry involving the evaluation and management of risks associated with storing, handling, and processing chemicals prone to reactivity. We are surveying 24 randomly selected companies (representing a spectrum of the industry) to see what practices are being routinely employed in reactive chemical management—so, your thorough and timely response is appreciated! The information from the survey data will be used to determine whether the CSB needs to issue new recommendations to industry regarding reactive hazard management.

We request that someone in your company/facility who is knowledgeable about reactive hazard management practices complete this voluntary survey. Some of the questions may deal with activities conducted by your company at a corporate or central location. Other questions will require the respondent to focus on activities performed at a plant. The survey is a combination of multiple-choice, yes/no, and short-answer questions. The time it takes to complete the survey will depend upon the complexity of your reactive chemical hazard management practices/program and your knowledge of the survey topics. The survey has been approved by the Office of Management and Budget and has met the conditions of the Paperwork Reduction Act. It is estimated that the survey can be completed in four to eight hours. However, the time can be shortened somewhat if you submit your company's/facility's reactive chemical hazard management written program; the survey could take longer if the survey respondent is not familiar with the survey issues or does not have access to the people who do. If you are providing documentation, please do not include any personal information.

CSB and FRD request that all survey responses are completed within 60 days. Please return the completed survey and any accompanying documents to us by [INSERT DATE WHEN AVAILABLE]. We will contact you one week before the survey results are due to see if you have any questions and to check your progress. Please feel free to contact Rebecca Beeson Etzel at <a href="retzel@loc.gov">retzel@loc.gov</a> or

202-707-1527, and Lauren Grim at <u>Lauren.Grim@csb.gov</u> or 202-407-5282 if you have questions about the survey.

Neither FRD nor the CSB are making promises of confidentiality for information provided in your responses to the survey or any additional documentation that you provide. Such information will be subject to the Freedom of Information Act (FOIA) and Privacy Act as appropriate.

### SurveyMonkey

SurveyMonkey is not a government website and is controlled and operated by a third party. Neither FRD's nor the CSB's website policies apply to SurveyMonkey. By completing this survey, respondents may be providing non-government third parties access to the information provided in the survey. For more information on FRD please see <a href="https://www.loc.gov/services/federal-research-division/about-this-service/">https://www.loc.gov/services/federal-research-division/about-this-service/</a> and for FRD's Privacy Policy please see <a href="https://www.csb.gov/legal/#privacy-policy">https://www.csb.gov/legal/#privacy-policy</a>. For more information on the CSB please see <a href="https://www.csb.gov/privacy-policy/">https://www.csb.gov/privacy-policy/</a>.

## **SURVEY QUESTIONS**

# **Survey Respondent Information**

1.	Company Name:
2.	Division/Facility:
3.	Number of Employees at the Company:
	<ul> <li>≤50</li> <li>□ 51–100</li> <li>□ 101–500</li> <li>□ 501–999</li> <li>□ 1,000–2,999</li> <li>□ 3,000–4,999</li> <li>□ 5,000–9,999</li> <li>□ ≥10,000</li> </ul>
4.	Number of Employees at the Facility:
	<ul> <li>≤50</li> <li>□ 51–100</li> <li>□ 101–500</li> <li>□ 501–999</li> <li>□ 1,000–2,999</li> <li>□ 3,000–4,999</li> <li>□ 5,000–9,999</li> <li>□ ≥10,000</li> </ul>
5.	Respondent's Name:
6.	Respondent's Job Title:
7.	Respondent's Role in Process Safety
	<ul> <li>□ Process Safety Management (PSM) Coordinator</li> <li>□ PSM Specialist</li> <li>□ Engineer</li> <li>□ Chemist</li> <li>□ Management</li> </ul>

	□ Other (please specify):	
8.	Facility Street Mailing Address:	

- 9. Work Daytime Telephone Number:
- 10. Work Email Address:

## **Facility Characteristics**

The following definitions may be helpful for you in understanding the scope of the survey.

#### **Reactive Hazard**

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A situation with the **potential** for an uncontrolled chemical reaction that can result in harm to people, property, or the environment, through the release of heat, energy, or hazardous byproducts.

For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

For the following questions, CSB classifies a reactive chemical as any pure substance or mixture that has the capability to create a reactive chemical incident. If uncertain, please use the incompatibility matrix from the Chemical Reactivity Worksheet.<sup>3</sup>

11. Which of	the following characterizes the number of reactive chemicals at your facility?
	Seldom are used
	l A few (2–5) reactive chemicals are used
	l Some (6–10) reactive chemicals are used
	Many (>10) reactive chemicals are used
	the following characterize(s) the level of hazard associated with the reactive s used at your facility? Check ALL that apply.
	l None are used

<sup>&</sup>lt;sup>3</sup> If uncertain, use the matrices in AiChE's Chemical Reactivity Worksheet to determine which chemicals have the potential to create a reactive hazard incident. For more information on the Chemical Reactivity Worksheet and how to install the program, see: <a href="https://www.aiche.org/ccps/resources/chemical-reactivity-worksheet">https://www.aiche.org/ccps/resources/chemical-reactivity-worksheet</a>.

	☐ Minimally reactive chemicals are used
	☐ Moderately reactive chemicals are used
	☐ Highly reactive chemicals are used
13. Which o	of the following characterizes the frequency of changes in the number, type, or
hazard	level of reactive chemicals used at your facility?
	☐ Rarely changes (e.g., less than once every few years)
	□ Infrequently changes (e.g., less than once per year)
	□ Occasionally changes (e.g., several times per year)
14. Which o	of the following characterize(s) the type of operations involving the use of
reactive	chemicals at your facility? Check ALL that apply.
	☐ Storage/handling of containers of reactive chemicals
	☐ Transfer/repackaging of reactive chemicals
	☐ Blending of reactive chemicals
	☐ Manufacturing of products using intentional chemical reactions
	☐ Other (please specify):

### **Management System**

The following definitions may be helpful for you in understanding the scope of the survey.

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#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

15.	Which of the following general reactive chemical hazard management practices are
	conducted at your company/facility? Check ALL that apply.
	$\square$ Chemical reactivity data collection and hazard identification
	☐ Reactive chemical testing
	☐ Reactive chemical qualitative hazard evaluation
	$\square$ Identification of controls/risk management options (including specifying
	hardware, software, procedural/administrative controls, and management system
	elements)
	$\square$ Documentation of reactive chemical risks and management decisions
	$\square$ Communication and training on reactive chemical hazards
	$\square$ Investigating reactive chemical incidents, and review, auditing and
	improvement of reactive chemical hazard management practices/program

16. Is there a written program document, officially approved by company senior management, which describes the formal management system(s) that specifically addresses reactive chemical hazards?

1 1 3
$\square$ Scope of application of the program (e.g., process life-cycle phases, what
type/specific substances or circumstances)
☐ Intended practices
$\hfill\square$ Identified procedures for the practices (e.g., a testing protocol to ensure high-
quality work)
$\hfill\square$ Specified inputs for each practice (e.g., reactivity test results prior to beginning
a Process Hazard Analysis (PHA))
$\square$ Intended outputs of each practice (e.g., decomposition temperature for a
substance or a situation)
$\square$ Designated roles and responsibilities (e.g., Process Development Chemist is
responsible for all reactive chemical testing)
$\hfill\square$ Anticipated schedules, targets, or deadlines for executing work (e.g., all testing
work must be completed prior to commencing detailed engineering design)
☐ Designated resources (e.g., budget, materials, equipment, and personnel)
$\square$ Means for auditing or improving the system
□ Other (please specify):

apply.	of the following best describe(s) how the program was developed? Check ALL that
,	☐ Developed by the corporate office
	☐ Developed by the business group level in the organization
	☐ Developed by the plant/facility
	☐ Developed from scratch
	☐ Adapted from a corporate program to meet local facility needs
	☐ Modeled after an industry peer company example
	☐ Assembled from good industry practice from a variety of sources
	☐ Adapted from a regulation (e.g., applied OSHA PSM to all reactive substances)
	If modeled after an industry peer company example, assembled from good industry practices from a variety of sources, and/or adapted from a regulation, please specify the peer company name, sources used, and/or regulation used:
20. How le	ong have the practices/programs been in existence?
	<ul> <li>☐ More than 10 years</li> <li>☐ 6 to 10 years</li> <li>☐ 1 to 5 years</li> <li>☐ Less than 1 year</li> </ul>
hazaro	☐ 6 to 10 years ☐ 1 to 5 years

- 22. What position, department, or job function is primarily responsible for implementing your reactive hazard management practices?
  - In the section below, please list the position, department, and title of the individual(s) responsible for implementing each reactive hazard management practice, as applicable.
  - When entering multiple job titles, list the positions in order from most to least involved in your reactive hazard management practice.
  - Avoid acronyms or abbreviations, and provide additional context where appropriate, especially if you use a term that might not be industry standard.

Hazard Management Practice/Activity	Position, Department, Title
Chemical Reactivity Data Collection	
and Hazard Identification	
Reactive Chemical Testing	
Reactive Chemical Qualitative	
Hazard Evaluation	
Identification of Controls/Risk	
Management Options	
Documentation of Reactive	
Chemical Risks and Management	
Findings	
Communications and Training	
Reviews and Audits	

- 23. Based on the previous question, what job function corresponds with the individual responsible for each reactive hazard management practice?
  - In the section below, please indicate with BROAD JOB CATEGORIES the role falls under. List all that apply and separate by commas as necessary. We have listed options below:
    - Corporate, Technical/Engineering, Outside Contractor, Research & Development, Safety, Management, Production, Design
  - Avoid acronyms or abbreviations, and provide additional context where appropriate, especially if you use a term that might not be industry standard.

Hazard Management Practice/Activity	Broad Job Categories (List all that apply) (Corporate, Technical/Engineering, Outside Contractor, Research & Development, Safety, Management, Production, Design)
Chemical Reactivity Data Collection	
and Hazard Identification	
Reactive Chemical Testing	
Reactive Chemical Qualitative Hazard Evaluation	
Identification of Controls/Risk	
Management Options	
Documentation of Reactive Chemical Risks and Management	
Findings  Communications and Training	
Reviews and Audits	
question that your facili position, department of BROAD JOB CATEGORIES below:  • Corporate, Development,  Include multiple job title position in order from mo	ive hazard management practices not mentioned in the previous ty engages in? If so, please name the practice(s) and list the the individual responsible for each practice. Also indicate which is the role falls under. List all that apply. We have listed options Technical/Engineering, Outside Contractor, Research & Safety, Management, Production, Design  es when appropriate; when entering multiple job titles, list the lest to least involved in your reactive hazard management practice.  reviations, and provide additional context where appropriate,
especially if you use a ter	m that might not be industry standard:
	ntial hazards of a chemical process, does your facility involve nental, health, and safety group?

☐ Sometimes

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☐ Often	
□ Always	

## Corporate/Facility Relationship

The following definitions may be helpful for you in understanding the scope of the survey.

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For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

26. Rank the three MOST important reasons for the original basis for development and

implementation of the reactive chemical hazard management practices/program at your facility. Select the TOP three statements and MARK them as 1, 2, or 3. Mark the remainde
as N/A.
$\Box$ Our experience (including near misses) using reactive chemicals for a long
time taught us that we had to carefully manage the risk of reactive chemicals
$\square$ We had a major accident involving reactive chemicals and that caused us to
start a program
☐ There was a major accident involving reactive chemicals elsewhere in industry
that caused us to start a program
☐ We became aware of evolving industry practices and resources—we thought it
would be a good idea (e.g., through a professional or trade association)
☐ Voluntary industry process safety initiatives encouraged us (e.g., ACC's
Responsible Care Process Safety Code)
☐ A customer/supplier requested/required us to have a program
☐ Regulatory compliance motivated us (e.g., OSHA PSM standard)

of the rea	e any other reasons for the original basis for development and implementation active chemical hazard management practices/program at your facility that were in the previous question?
If so, plea	ase list the reason(s) below:
	the following best describes the driving force or responsibility for making sure ram is implemented on an ongoing basis?
Г	l Corporate management oversight
	Business group management oversight
	Local management oversight
	Combined management oversight
	No formal oversight, but strong safety culture exists
	Other (please specify):
	type of projects do you apply reactive chemical hazard management
practices	/programs? Check ALL that apply.
	l New large capital projects
	l New small capital projects
	Modifications to existing process equipment
	Modifications to existing process chemistry
	New products planned for manufacture in existing equipment
	Subsequent campaigns for the same product in the same equipment
	Changeover from one existing product campaign to another existing product
	ampaign using the same equipment
	Transfer of production to a contract (toll) manufacturer

## Chemical Reactivity Data Collection and Hazard Identification

The following definitions may be helpful for you in understanding the scope of the survey.

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For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

30. The following are different approaches to gathering or generating reactive chemicals hazard data. How valuable do you find each of these to be in implementing your reactive chemical hazard management program? Check ONE in each row for ALL items that apply.

	Extremely Valuable	Somewhat Valuable	Not Valuable
Literature surveys			
Vendor/supplier information (including, but not limited to, safety data sheets)			
Vendor/supplier technical service representative			
Evaluation of chemical structure (looking for known unstable groups)			
Thermodynamic calculations			
Computer programs (e.g., CRW, CAMEO, CHETAH, etc.)			

In-house expert opinion		
Use of outside consultants		
Existing company databases		
Chemical reactivity testing		

List other approaches (please specify) and indicate whether each is extremely, somewhat, or not valuable:

31. The following are recognized sources of information on reactive chemical hazard management practices. How valuable do you find each of these to be in implementing your reactive chemical hazard management program? Check ONE in each row for ALL items that apply.

	Extremely Valuable	Somewhat Valuable	Not Valuable
OSHA PSM/EPA RMP regulatory requirements			
OSHA PSM/EPA RMP non-mandatory guidance documents			
Guidance documents from technical societies (e.g., CCPS, ACS)			
Guidance documents from chemical manufacturer/distributor			
Standards and best practices from technical societies (e.g., ASTM, NFPA)			
Guidance documents from trade associations (e.g., ACC, SOCMA)			
Contracted specialists or consultants outside of your company			
Peer contacts outside of your company			
Internal company experts and other resources			
Papers presented at technical meetings and symposia			
Journal articles			

			Extremely Valuable	Somewhat Valuable	Not Valuable
		Reference texts (e.g., Bretherick's, Sax's) <sup>4</sup>			
		Other sources (please specify) and indicator or not valuable:	ate whether e	each is extreme	ly, somewhat,
32.	Instab	your company/facility site use the Nationa ility Rating System (NFPA 704) when evalu than for emergency response planning)?			
		☐ We seldom use the NFPA Instability R chemical safety issues ☐ The NFPA Instability Rating System is address reactive chemical safety issues ☐ We have site/corporate standards req Rating System in addressing reactive chemical safety issues	optionally us	ed as the analy	st sees fit to
33.	the res	company/facility site uses the NFPA Insta sponse that best describes your experience company does not use the NFPA System	ce using the s	•	
		<ul><li>☐ It is often useful</li><li>☐ It is occasionally useful</li><li>☐ It is seldom useful</li><li>☐ N/A</li></ul>			
34.	Addition application	onal comments regarding the use of the <b>I</b> able:	NFPA Instabil	ity Rating Syste	em, as
35.	•	our company/facility site use the Stoesse echemical safety issues (other than for e	-		•

<sup>4</sup> Bretherick's Handbook of Reactive Chemical Hazards and Sax's Dangerous Properties of Industrial Materials.

chemical safety issues

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 $\square$  We seldom use the Stoessel Criticality Classification to address reactive

<ul> <li>□ The Stoessel Criticality Classification is optionally used as the analyst sees fit to address reactive chemical safety issues</li> <li>□ We have site/corporate standards requiring the use of the Stoessel Criticality Classification in addressing reactive chemical safety issues</li> </ul>
36. If your company/facility site uses the Stoessel Criticality Classification, indicate the response that best describes your experience using the system. Otherwise, select N/A if your company does not use the Stoessel Classification.
☐ It is often useful ☐ It is occasionally useful ☐ It is seldom useful ☐ N/A
37. Additional comments regarding the use of the Stoessel Criticality Classification, as applicable:
38. Does your reactive chemical hazard management program include the use of a chemical incompatibility (chemical reaction) matrix?
□ Yes □ No
☐ No  If "yes" to question 38, SurveyMonkey will go through the questions as normal. If "no" to question 38, SurveyMonkey will skip to question 41 and continue on from there.
□ No  If "yes" to question 38, SurveyMonkey will go through the questions as normal. If "no"
☐ No  If "yes" to question 38, SurveyMonkey will go through the questions as normal. If "no" to question 38, SurveyMonkey will skip to question 41 and continue on from there.  If "yes" to the previous question

40. If you use chemical incompatibility (chemical reaction) matrices, what data sources are used in completing the matrix? Check ALL that apply.
☐ Safety data sheets (SDSs)
☐ Opinions of company experts
$\square$ Opinions of outside experts
☐ References such as Bretherick's or Sax's
☐ AiChE's Chemical Reactivity Worksheet
☐ Reactive chemical testing results
☐ Other (please specify):

## **Reactive Chemical Testing**

The following definitions may be helpful for you in understanding the scope of the survey.

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#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

41. If you use reactive chemical testing as a source of chemical reactivity hazard data, who performs the testing? Check ONE in each row for ALL items that apply.

	Nearly All the Time	Some of the Time	Very Infrequently
We use our own onsite testing capabilities			
We use our corporate or business group testing capabilities			
We use a contractor for our testing			

42. If you use reactive chemical testing, indicate the likelihood that you would obtain thermal stability data for each of the following. Check ONE in each row for ALL items that apply.

Very	Likely	Very	N/A
Likely		Unlikely	

Feed materials		
Intermediates		
Other products		
Equipment cleaning materials		
Maintenance materials		
Byproducts and waste streams		

43. Are written guidelines provided for reactive chemical testing methodologies or protocols to help ensure consistent and high-quality results? Check ALL items that apply.

$\square$ Yes, corporate guidelines are provided
$\square$ Yes, business unit guidelines are provided
$\square$ Yes, site guidelines are provided
$\hfill\square$ Yes, apparatus manufacturer or vendor-supplied procedures
□ No

44. The following are typical approaches/methods used to generate data in a reactive chemical testing program. If you use reactive chemical testing, indicate the likelihood that you would seek this data. Check ONE in each row for ALL items that apply.

	Very Likely	Likely	Very Unlikely
Screening to determine			
thermal stability of process materials			
Screening to determine			
compatibility of process			
materials			
Screening to identify undesired			
side reactions including			
thermal decomposition			
Calorimetry to determine			
runaway onset			
temperatures			
Calorimetry to determine			
maximum adiabatic reaction			
temperatures			

	Calorimetry to determine reaction kinetics				
	Testing to determine gas evolution and pressure rise rates				
	Testing to determine emergency relief requirements and flow characteristics				
	Screening to determine impact (shock) sensitivity of process materials				
	Testing to determine whether specific credible process upsets (e.g., agitation loss, cooling loss, double-batching) could result in runaway reactions				
45	List other reactive chemical testing approaches/methods (please specify) and indicate the likelihood of you using it (very likely, likely, unlikely):  45. Have you identified key parameters (e.g., onset temperature) and established quantitative criteria (e.g., 50°C safety margin above the maximum operating temperature) for categorizing reactive chemical hazard "levels" when interpreting the results of tests checked				
	in the previous question?  ☐ Yes ☐ No				
	If "yes" to question 45, SurveyMonkey v to question 45, SurveyMonkey will skip	5	•	1	
If "yes" to the previous question					
	46. Please give a few parameters/criteria in categorizing reactive chemical hazard "levels" when interpreting the results of tests:				

47. Listed below are a number of classes of reactive chemical testing apparatus or analytical techniques that are incorporated in reactive chemical hazard management practices/programs. Indicate for each the frequency with which it is used in support of your reactive chemical testing program. Check ONE in each row for ALL items that apply.

	Frequently Used	Occasionally Used	Seldom Used	N
TGA, thermogravimetric analysis				[
DSC, differential scanning calorimetry				[
DTA, differential thermal analysis				[
ARC, accelerating rate calorimeter				[
VSP, vent sizing package				[
RC1, reaction calorimeter				[
RSST, reactive system screening tool				[
IST, isothermal storage test				[
C-80				[
SIKAREX, RADEX, and/or SEDEX				[
APTAC, automatic pressure tracking adiabatic calorimeter				[
Carius (ICI) Sealed Tube Test				[
PHI-TEC				[

is used in support of your reactive chemical testing program:

48. Where are reactive chemical testing results archived so that they are accessible and can be searched by users? Check ALL items that apply.

□ Corporate or business group electronic/cloud database□ Corporate or business group hard copy files□ Facility electronic/cloud database

☐ Facility hard copy files
$\square$ Not kept after project is complete
☐ Other (please specify):

## **Qualitative Hazard Evaluation**

The following definitions may be helpful for you in understanding the scope of the survey.

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For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

49. We want to know how likely you are to perform a reactive chemical hazard evaluation in a number of common situations. These evaluations may be performed with qualitative analysis methods only (i.e., using well-known methods, such as brainstorming, checklists, what-if analysis, HAZOP analysis, or others), or these evaluations may be supplemented with quantitative reactive testing data. If you are required by a site or corporate program to perform such an evaluation, or are likely to do so, check the first or second column, as most appropriate. Otherwise, check the third column.

	Required	Not Required but Likely	Not Required or Unlikely
Research phase for a new processor product (e.g. laboratory)			
Development phase for a new process or product (e.g. pilot plant)			
Design phase for a new process or product			
Evaluating a proposed modification to an existing process or product			

apply.

As part of an incident or near-miss			
investigation			
Periodic reevaluation of an existing			
process			
Evaluation of an existing process that			
has not been previously evaluated		_	_
In preparation for abandoning a process			
or decommissioning a process unit			
List other evaluations (please specify) an	•	•	•
corporate program to perform such an e	evaluation, or a	re likely to c	10 SO:
50. Are there certain criteria that necessitate either	a process haza	rd analysis c	r a higher
level of scrutiny at your company or facility? Che	•	-	3
is is a second of good company of facility. Cit	22 (I) (I) (I)	7,7,	
☐ scale-up of chemical activity			
•	_		
☐ presence of highly energetic reactions			
$\square$ presence of highly energetic function	al groups		
$\square$ gas evolution			
$\square$ use of highly corrosive and/or hazard	ous materials		
☐ presence of pyrophoric reagents			
□ past history			
•			
☐ literature precedent			
51. Which of the following qualitative analysis meth	ods do you us	e for your re	active hazard
evaluations? Check ALL that apply.	•	-	
☐ Brainstorming			
☐ Checklists			
☐ What-if analysis			
$\square$ HAZOP analysis			
□ N/A			
☐ Other (please specify):			
_ 5 (p. 6556 5p66.1) //			
F2 What makes an appropriate and the same of the same	المراجع والمراجع	السيدية الممالية	-f :
52. What means or sources are used to ensure that			
considered when conducting a Process Hazard	Analysis (PHA)?	Check ALL	items that

<ul> <li>□ Computer programs and other chem</li> <li>CHETAH, etc.)</li> <li>□ Chemistry descriptions in process ma</li> <li>□ Detailed process technology package</li> <li>□ Participation by process developmen</li> <li>□ Participation by plant technical speci</li> <li>□ Participation by site reactive chemical</li> </ul>	ical database anuals es nt chemist or alist als expert	es (e.g., CRW, C	AMEO,
w many people are involved in conducting r	eactive chen	nical qualitative	hazard
luations for each process life-cycle phase? C	heck ONE in	n each row for A	LL items that
oly.			
	One	Collaborative	N/A
	Individual	Team	
R&D (including laboratory, conceptual			
design/pilot plant)			
Detailed engineering design			
Commercial process operation (including			
start-up)			
ich of the following describe(s) the ways in vertive chemical scenarios are considered in youlitative hazard evaluation activities? Check A  Brainstorming  Literature survey  Manufacturer/supplier/vendor technic	which you er our reactive ALL items tha	nsure that all sig chemical testing at apply.	nificant
	Stoessel Criticality Classification  NFPA (National Fire Protection Agen Computer programs and other chem CHETAH, etc.)  Chemistry descriptions in process ma Detailed process technology package Participation by process developmer Participation by plant technical speci Participation by site reactive chemical Participation by manufacturer/supplication of the following laboratory, conceptual design/pilot plant)  Detailed engineering design  Commercial process operation (including start-up) Decommissioning (including maintenance turnarounds)  er (please specify) and indicate how many paborative team, N/A):  sich of the following describe(s) the ways in various design experience in the critical scenarios are considered in year literature survey  Brainstorming Literature survey	□ Stoessel Criticality Classification           □ NFPA (National Fire Protection Agency) Instability           □ Computer programs and other chemical database CHETAH, etc.)           □ Chemistry descriptions in process manuals           □ Detailed process technology packages           □ Participation by process development chemist or           □ Participation by plant technical specialist           □ Participation by site reactive chemicals expert           □ Participation by manufacturer/supplier/vendor technical specialist           □ Participation by manufacturer/supplier/vendor technical specialist           □ Participation by manufacturer/supplier/vendor technicals expert           □ Participation by manufacturer/supplier/vendor technical service in           □ Other (please specify):           □ Wanauf (please specify):           □ One Individual           □ R&D (including laboratory, conceptual design/pilot plant)         □ Detailed engineering design           □ Commercial process operation (including start-up)         □ Decommissioning (including maintenance turnarounds)           □ Process operation (including maintenance turnarounds)         □ Decommissioning (including maintenance turnarounds)           □ Process operation (including maintenance turnarounds)         □ Decommissioning (including maintenance turnarounds)           □ Process operation (including maintenance turnarounds)         □ Decommissioning (including maintenance turnarounds) <td>Stoessel Criticality Classification  NFPA (National Fire Protection Agency) Instability Rating System Computer programs and other chemical databases (e.g., CRW, Computer Computer Protection of Computer Computer Protection of Computer Protection of Computer Computer Protection of Protection of Protection of Computer Protection of Protection of Computer Protection of Computer Protection of Protection of Computer Protection of Computer Protection of Protection of Computer Pr</td>	Stoessel Criticality Classification  NFPA (National Fire Protection Agency) Instability Rating System Computer programs and other chemical databases (e.g., CRW, Computer Computer Protection of Computer Computer Protection of Computer Protection of Computer Computer Protection of Protection of Protection of Computer Protection of Protection of Computer Protection of Computer Protection of Protection of Computer Protection of Computer Protection of Protection of Computer Pr

	Yes	No
Research & Development		
Technical/engineering		
Design		
Corporate		
Safety		
Management		
Production		
Other personnel type (please specify)  e nature and severity of reactive chem nining the interval between performing tions for the process (e.g., are PHAs for	ical hazards in a p g periodic qualitat r processes with "	tive or q 'higher"

to question 56, SurveyMonkey will skip to question 58 and continue on from there.

If "yes" to the previous question...

57. Please describe how the nature and severity chemical hazards are considered in determining the interval between performing periodic qualitative or quantitative hazard evaluations for the process:

## **Identification of Controls/Risk Management Options**

The following definitions may be helpful for you in understanding the scope of the survey.

#### **Reactive Hazard**

The CSB is aware that industry uses a variety of ways to classify/evaluate the chemical reactivity of a substance; however, for this survey, the CSB broadly defines a reactive chemical hazard as:

A situation with the **potential** for an uncontrolled chemical reaction that can result in harm to people, property, or the environment, through the release of heat, energy, or hazardous byproducts.

For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

58. Which of the following means are used by your reactive chemical hazard management practices/program at your site to ensure a thorough review is undertaken to determine the safe design for the following items? Check ALL that apply.

	Hazard Evaluation Activity						
Safety Enhancement	Does Not Apply	Peer Practice	Codes & Standards	Design/P&ID Review	Qualitative Hazard Evaluation	Conseque nce Analysis or QRA	Other
Emergency pressure relief capability							
Safe disposal of materials relieved							
Emergency Cooling systems							
Quench/ dump systems							

	Hazard Evaluation Activity						
Safety Enhancement	Does Not Apply	Peer Practice	Codes & Standards	Design/P&ID Review	Qualitative Hazard Evaluation	Conseque nce Analysis or QRA	Other
Basic process control system							
Alarms Safety interlocks							
Automation to prevent human error							
Inherently safer design alternatives							
Safe operating limits definition							
Emergency ventilation systems							
Secondary containment							
Personal protective equipment							

List other good practices and design features (please specify) and indicate where it applies (Peer Practice, Codes & Standards, Design/P&ID Review, Qualitative Hazard Evaluation, Consequence Analysis or QRA, Other):

59. At your facility/company, what outcomes would require a change in the process or prevent a process from moving forward? Check ALL that apply.

☐ Stoessel classification above a certain rank
☐ Large exotherm
☐ Decomposition detected at or close to the operating temperature
☐ Uncontrolled gas generation
☐ Potential for explosion
☐ Other (please specify):

60. Does your facility have an emergency plan of response in case of a reactive chemical incident with the following entities?

	res	INO	IN/A
Local first responders			
Local Emergency Planning Committee			
Local Department of Emergency Management			
Other local government entities			
State Emergency Response Commission			
State Department of Emergency Management			
Other state government entities			
Local businesses/residents			
of the following best describes the perform after reactive chemical incidents?	ance of you	r emergency	response
<ul> <li>□ Our facility has never had a reactive che</li> <li>□ Our emergency response plans generall of a reactive chemical incident.</li> <li>□ Our emergency response plans sometimes case of a reactive chemical incident.</li> </ul>	emical incide ly operate ac nes operate	nt. cording to paccording to	plan in the case o plan in the
☐ Our emergency response plans rarely op a reactive chemical incident.	perate accor	ding to plan	in the case of
of the following best characterizes the frequency response plans?	uency of upo	dates to you	r facility's
☐ Rare updates			

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☐ Occasional updates

☐ Regular updates	
63. Does your facility have access to a notification system to alert co the case of a reactive chemical incident?	mmunity members in
□ Yes	

## **Communication and Training**

The following definitions may be helpful for you in understanding the scope of the survey.

#### **Reactive Hazard**

The CSB is aware that industry uses a variety of ways to classify/evaluate the chemical reactivity of a substance; however, for this survey, the CSB broadly defines a reactive chemical hazard as:

A situation with the **potential** for an uncontrolled chemical reaction that can result in harm to people, property, or the environment, through the release of heat, energy, or hazardous byproducts.

For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

64. Which of the following describe(s) the primary way(s) in which the findings from reactive chemical hazard management practices are communicated among corporate departments and facility management, engineering, and production, and between the company and outside parties? Add other examples in the comment box, if needed. Check ALL that apply.

#### **Communication Pathway**

Communication Means	Corporate (or Business Group) to Facility	Engineering (or Technical) to Production	Management to Employees	Outside Party to Company/Facility
Simple letter/memo				
Informal presentation				
Project book/data files				
Formal report				
Official action item				

Communication Means	Corporate (or Business Group) to Facility	Engineering (or Technical) to Production	Management to Employees	Outside Party to Company/Facility
Safety bulletin				
Informal discussion				
Required reading file				
Documented training				
Operating instructions				
Regular safety meetings				
Incident reports				

List other communication means (please specify) and indicate the pathway of communication [Corporate (or Business Group) to Facility Engineering (or Technical) to Production Management to Employees Outside Party to Company/Facility]:

65. Do the following personnel receive formalized training in identifying, evaluating, and controlling reactive chemical hazards (commensurate with their job roles and responsibilities)? Check ONE in each row for ALL items that apply.

Personnel	Yes	No
R&D		
Design		
Plant technical/engineering		
Operations supervision		
Operators/technicians		
Maintenance/personnel		

Other personnel (please specify) and indicate whether they receive formalized training in identifying, evaluating, and controlling reactive chemical hazards:

\_\_\_\_\_

## **Renewal and Continuous Improvement**

The following definitions may be helpful for you in understanding the scope of the survey.

#### **Reactive Hazard**

The CSB is aware that industry uses a variety of ways to classify/evaluate the chemical reactivity of a substance; however, for this survey, the CSB broadly defines a reactive chemical hazard as:

A situation with the **potential** for an uncontrolled chemical reaction that can result in harm to people, property, or the environment, through the release of heat, energy, or hazardous byproducts.

For the purposes of this survey, the CSB classifies a **reactive chemical** as any pure substance or mixture that has the capability/potential to create a reactive chemical incident.

#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

66.	What job position in your company/facility is responsible for the ongoing implementation and improvement of the reactive chemical hazard management practices/program?
67.	How often are the reactive chemical hazard management practices/program reviewed or audited for improvement?
	<ul> <li>□ Never</li> <li>□ Rarely</li> <li>□ Occasionally, when prompted after an incident</li> <li>□ At regular intervals</li> </ul>
68.	Does your site report and track reactive chemical incidents (including near misses?) Check ALL that apply.
	☐ At site level

	<ul><li>□ At corporate or business group level</li><li>□ Industry-wide</li><li>□ Do not track on a consistent basis</li></ul>
69.	Does your site ensure that reported/tracked chemical incident information is communicated company-wide and retained as part of corporate memory? Please explain.
70.	Do you share data regarding reactive chemical incidents (including near misses) with trade associations, suppliers/customers, or other manufacturers in your industry?
	□ Yes □ No
71.	How is incident data used within your site and company-wide to improve safe design, operation, and maintenance of reactive chemical processes and reactive chemical hazard management practices/programs? Please explain.

#### **Future Needs**

The following definitions may be helpful for you in understanding the scope of the survey.

#### **Reactive Hazard**

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A situation with the **potential** for an uncontrolled chemical reaction that can result in harm to people, property, or the environment, through the release of heat, energy, or hazardous byproducts.

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#### **Reactive Chemical Incident**

A sudden event involving a reactive hazard with abrupt and significant increases in temperature, pressure, and/or gas evolution that has the potential to cause, or has caused, serious harm to people, property, or the environment.

72. Does your company see the need for an industry-wide database on reactive chemical <i>incidents</i> ? (One that is easily accessible to those who need it.)
□ Yes
□ No
If "yes" to question 72, SurveyMonkey will go through the questions as normal. If "no" to question 72, SurveyMonkey will skip to question 75 and continue on from there.
If "yes" to the need for an industry-wide database on reactive chemical incidents
73. Would your company be likely to contribute to such a database?
□ Yes
□ No

74. Who should maintain such a database?
75. Does your company see the need for an industry-wide database on reactive chemical <i>testing</i> ? (One that is easily accessible to those who need it.)
□ Yes □ No
If "yes" to question 75, SurveyMonkey will go through the questions as normal. If "no" to question 75, SurveyMonkey will skip to question 78 and continue on from there.
If "yes" to the need for an industry-wide database on reactive chemical testing
76. Would your company be likely to contribute to such a database?  ☐ Yes ☐ No
77. Who should maintain such a database?
78. Does your company see the need for further industry guidance on reactive chemical hazard management issues?
□ Yes □ No

If "yes" to question 78, SurveyMonkey will go through the questions as normal. If "no" to question 78, SurveyMonkey will skip to question 80 and continue on from there.

If "yes" to the need for further industry guidance on reactive chemical hazard management issues...

79. Who has a need for this guidance and how might it be developed? Please explain.

chemical hazards and management practices/programs?

80. Would your company be willing to participate in further discussions concerning reactive

☐ Yes

□ No

## Additional Comments & Feedback

Please let us know about your experience filling out this survey.
81. How satisfied were you with the clarity of intent of questions?
☐ Very Satisfied ☐ Somewhat Satisfied
☐ Neither Satisfied nor Dissatisfied
☐ Somewhat Dissatisfied
☐ Very Dissatisfied
82. How easy was it to collect information to complete the survey?
□ Very Easy
☐ Somewhat Easy
☐ Neither Easy nor Difficult
☐ Somewhat Difficult
☐ Very Difficult
83. Usefulness of the survey to you (e.g., new ideas, benchmarking)
□ Very Useful
☐ Somewhat Useful
☐ Neither Useful nor Unhelpful
☐ Somewhat Unhelpful
☐ Very Unhelpful
84. What other comments or questions do you have that you want us to know?

## **End of Survey**

Thank you for your participation in the CSB Reactive Hazards Survey. Your feedback from this survey will greatly help in improving reactive hazards management and safety practices.

If you have any questions about this survey or the reactive hazards study, please contact Rebecca Beeson Etzel at retzel@loc.gov or 202-707-1527, and Lauren Grim at Lauren.Grim@csb.gov or 202-407-5282.