



CSB Reactive Hazards Study

The CSB is replicating its 2002 Reactive Hazards Study. As part of this process, the CSB will be submitting the below survey to OMB for review. The public will have the opportunity to submit comments to <u>reactives@csb.gov</u> during the time frame specified in the Federal Register notice.

Survey of Industry Practices

BACKGROUND

The United States Chemical Safety and Hazard Investigation Board (CSB) is surveying relevant industry organizations with the goal of examining industry practices on the topic of reactive hazard safety and management. Your company/facility was randomly selected and has subsequently agreed 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.

CSB is an independent federal agency with the mission to investigate, and promote the prevention of, major chemical incidents at industrial facilities. The CSB is a scientific investigation organization; it is not an enforcement or regulatory body. 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 in the course of conducting incident investigations, the CSB is alerted to significant safety problems that are beyond the scope of any one particular investigation. As a result, the CSB conducts a hazard investigation or safety study to better understand the nature and causes of more pervasive and systemic safety problems. As an update to the 2002 report, <u>"Improving Reactive Hazard Management,"</u> 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. FRD is executing a number of different research tasks as part of the new investigation, including this survey. The FRD team will use the responses to this survey to examine industry practices associated with the prevention of reactive chemical incidents.

OVERVIEW OF REACTIVE CHEMICAL HAZARD INVESTIGATION

This updated reactive chemical hazard investigation (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 investigation 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. Examining practices at large, medium, and small companies with regard to reactive chemical safety, 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 Federal Research Division (FRD) of the Library of Congress is contracted by the CSB to, among myriad other research tasks, conduct a survey of industry practices involving hazardous reactive chemicals and reactive chemical incidents. 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.

SURVEY INSTRUCTIONS

Your company/facility has agreed 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 purpose of the survey is to identify the range of practices in place in the industry to deal with hazardous reactive chemicals. This is not a best-practices-only survey, and we are NOT looking for weakness in any specific company/facility activities. Rather, we are surveying 15 selected companies (representing a spectrum of the industry) that handle reactive chemicals simply to see what practices are being routinely employed—so, your thorough and timely response is appreciated!

We request that someone in your company/facility who is knowledgeable about reactive hazard management practices complete this 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. Reasonably, it can be completed in **[INSERT TIME HERE] 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 people who do.

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 us at [INSERT EMAIL AND PHONE NUMBER] if you have questions about the survey.

SURVEY QUESTIONS

Survey Respondent Information

- a. Company Name:
- b. Division/Facility:
- c. Number of Employees at the Company and Facility (check only ONE in each column):

Company	Facility
□ ≤50	□ ≤50
□ 51–100	□ 51–100
□ 101–500	□ 101–500
□ 501–999	□ 501–999
□ 1,000–2,999	□ 1,000–2,999
□ 3,000–4,999	□ 3,000–4,999
□ 5,000–9,999	□ 5,000–9,999
□ ≥10,000	□ ≥10,000

- d. Respondent's Name:
- e. Respondent's Job Title:
- f. Respondent's Role in Process Safety (check only ONE):
 - □ Process Safety Management (PSM) Coordinator
 - □ PSM Specialist
 - □ Engineer
 - Chemist
 - □ Management
 - Other (please specify): _____
- g. Street Mailing Address:
- h. Daytime Telephone Number:
- i. Email Address:

Facility Characteristics

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.¹

- 1. Which of the following characterizes the number of reactive chemicals at your facility? Check only ONE answer.
 - □ Seldom are used
 - □ A few (2–5) reactive chemicals are used
 - □ Some (6–10) reactive chemicals are used

¹ 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: <u>https://www.aiche.org/ccps/resources/chemical-reactivity-worksheet</u>.

□ Many (>10) reactive chemicals are used

- 2. Which of the following characterize(s) the level of hazard associated with the reactive chemicals used at your facility? Check ALL that apply.
 - \Box None are used
 - \Box Minimally reactive chemicals are used
 - □ Moderately reactive chemicals are used
 - □ Highly reactive chemicals are used
- 3. Which of the following characterize the frequency of changes in the number, type, or hazard level of reactive chemicals used at your facility? Check only ONE answer.
 - □ 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)
- 4. Which 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
 - \Box Blending of reactive chemicals
 - □ Manufacturing of products using intentional chemical reactions
 - Other (please specify): ______

Management System

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

- 6. 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?
 - □ Yes □ No
 - es" to question 6, are you w

a. If "Yes" to question 6, are you willing to share these written documents? You may email/submit these documents to [POINT OF CONTACT]. Note: We encourage you to anonymize information as you see fit and, as a reminder, anything you provide will only be used in an information-gathering capacity.

- \Box Yes
- 🗆 No
- 7. If "Yes" to question 6, which of the following management system features do the written program document(s) address? Check ALL that apply.

 $\hfill\square$ Purpose of the program

□ Scope of application of the program (e.g., process life-cycle phases, what type/specific substances or circumstances)

□ Intended practices (see question 3)

□ Identified procedures for the practices (e.g., a testing protocol to ensure highquality work)

□ Specified inputs for each practice (e.g., reactivity test results prior to beginning a Process Hazard Analysis (PHA))

□ Intended outputs of each practice (e.g., decomposition temperature for a substance or a situation)

□ Designated roles and responsibilities (e.g., Process Development Chemist is responsible for all reactive chemical testing)

□ 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)

 \Box Means for auditing or improving the system

- Other (please specify): _____
- 8. Which of the following best describe(s) how the program was developed? Check ALL that apply.
 - \Box Developed by the corporate office
 - \Box Developed by the business group level in the organization
 - □ Developed by the plant/facility

- \Box Developed from scratch
- \Box Adapted from a corporate program to meet local facility needs
- □ Modeled after an industry peer company example Industry peer company name: _____
- Assembled from good industry practices from a variety of sources Sources used (please specify): ______
- □ Adapted from a regulation (e.g., applied OSHA PSM to all reactive substances) Regulation used (please specify): _____
- 9. How long have the practices/programs been in existence? Check only ONE answer.
 - \Box More than 10 years
 - \Box 6 to 10 years
 - \Box 1 to 5 years
 - \Box Less than 1 year
- 10. Which of the following best describes the relationship between your reactive chemical hazard management practices/program and related regulatory requirements in OSHA PSM and EPA RMP? Check only ONE answer.
 - □ Company programs driven nearly exclusively by regulatory applicability
 - □ Company programs PRIMARILY driven by regulatory applicability, but SOME nonregulated/chemicals included

□ Company programs SOMEWHAT driven by regulatory applicability, but MANY nonregulated hazards/chemicals included

□ Company programs are not at all driven by regulatory applicability

- 11. What position, department, or job function is primarily responsible for implementing your reactive hazard management practices?
 - In the section below, please list positions or job functions that implement your reactive hazard management practices.
 - Also be sure to indicate which BROAD JOB CATEGORIES the role falls under. We have listed options below
 - Corporate, Technical/Engineering, Outside Contractor, Research & Development, Safety, Management, Production, Design
 - Include multiple job titles where appropriate; when entering multiple job titles, list the positions in order from most involved 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	Broad Job Categories (List all that apply) (Corporate, Technical/Engineering, Facility, 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		
Other (please specify):		

- 12. When assessing the potential hazards of a chemical process, does your facility involve experts from an environmental, health, and safety group?
 - \Box Rarely or never
 - \square Sometimes
 - \Box Often
 - \Box Always

Corporate/Facility Relationship

13. 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. Leave the remainder blank.

 \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

 \Box We had a major accident involving reactive chemicals and that caused us to start a program

 \Box 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)

Other (please specify): _____

- 14. Which of the following best describes the driving force or responsibility for making sure the program is implemented on an ongoing basis? Check only ONE answer.
 - □ Corporate management oversight
 - □ Business group management oversight
 - □ Local management oversight
 - □ Combined management oversight
 - □ No formal oversight, but strong safety culture exists
 - Other (please specify): _____
- 15. To what type of projects do you apply reactive chemical hazard management practices/programs? Check ALL that apply.
 - □ New large capital projects
 - □ New small capital projects
 - □ Modifications to existing process equipment
 - $\hfill\square$ 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 campaign using the same equipment
 - $\hfill\square$ Transfer of production to a contract (toll) manufacturer

Chemical Reactivity Data Collection and Hazard Identification

16. 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			
Other (please specify):			
Other (please specify):			

17. 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			

	Extremely Valuable	Somewhat Valuable	Not Valuable
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			
Reference texts (e.g., Bretherick's, Sax's) ²			
Other (please specify):			
Other (please specify):			

18. Does your company/facility site use the National Fire Protection Association (NFPA) Instability Rating System (NFPA 704) when evaluating reactive chemical safety issues (other than for emergency response planning)?

□ We seldom use the NFPA Instability Rating System to address reactive chemical safety issues

□ The NFPA Instability Rating System is optionally used as the analyst sees fit to address reactive chemical safety issues

□ We have site/corporate standards requiring the use of the NFPA Instability Rating System in addressing reactive chemical safety issues

a. If your company/facility site uses the NFPA Instability Rating System (NFPA 704) indicate the response that best describes your experience using the system. Check only ONE answer.

 \Box It is often useful

□ It is occasionally useful

 \Box It is seldom useful

² Bretherick's Handbook of Reactive Chemical Hazards and Sax's Dangerous Properties of Industrial Materials.

b. Additional comments:

-	our company/facility site use the Stoessel Criticality Classification when evaluating chemical safety issues (other than for emergency response planning)?
	□ We seldom use the Stoessel Criticality Classification to address reactive chemical safety issues
	□ The Stoessel Criticality Classification is optionally used as the analyst sees fit to address reactive chemical safety issues
	□ We have site/corporate standards requiring the use of the Stoessel Criticality Classification in addressing reactive chemical safety issues
-	our company/facility site uses the Stoessel Criticality Classification, indicate the nse that best describes your experience using the system. Check only ONE answer. It is often useful It is occasionally useful
	□ It is seldom useful
b. Ado	ditional comments:
0. Does yo	our reactive chemical hazard management program include the use of a chemical
incompa	atibility (chemical reaction) matrix?
	□ Yes □ No
a. If th that a	ne answer is "YES," indicate below the scope of application of the matrix. Check ALL pply.

□ Combinations of process chemicals

□ Combinations of process chemicals and materials of construction (including gaskets)

□ Combinations that include credible, inadvertent substitutions (e.g., stainless steel for Hastelloy)

□ More than binary combinations—please describe how this is accomplished:

- 21. 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)
 - \Box Opinions of company experts
 - \Box Opinions of outside experts
 - $\hfill\square$ References such as Bretherick's or Sax's
 - □ AiChE's Chemical Reactivity Worksheet
 - \Box Reactive chemical testing results
 - Other (please specify): _____

Reactive Chemical Testing

22. 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			

23. 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	Likely	Very Unlikely	N/A
Feed materials				
Intermediates				
Other products				
Equipment cleaning materials				
Maintenance materials				
Byproducts and waste streams				

- 24. Are written guidelines provided for reactive chemical testing methodologies or protocols to help ensure consistent and high-quality results? Check ALL items that apply.
 - □ Yes, corporate guidelines are provided
 - \Box Yes, business unit guidelines are provided
 - \Box Yes, site guidelines are provided
 - □ Yes, apparatus manufacturer or vendor-supplied procedures
 - \Box No
- 25. 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			
Other (please specify):			
Other (please specify): 			

- 26. Have you identified key parameters (e.g., onset temperature) and established quantitative criteria (e.g., 50°C safety margin above maximum operating temperature) for categorizing reactive chemical hazard "levels" when interpreting the results of tests checked in question 23.
 - □ Yes
 - 🗆 No

a. If "yes", please give a few parameters/criteria.

27. 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	Occasionally	Seldom	N/A
	Used	Used	Used	
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				
C80				
SIKAREX, RADEX, and/or SEDEX				
APTAC, automatic pressure tracking adiabatic calorimeter				
Carius (ICI) Sealed Tube Test				
PHI-TEC				
Other (please specify):				
Other (please specify):				

- 28. 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
 - \Box Corporate or business group hard copy files
 - □ Facility electronic/cloud database
 - \Box Facility hard copy files
 - \Box Not kept after project is complete
 - Other (please specify): _____

Qualitative Hazard Evaluation

29. 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			
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			
Other (please specify):			
Other (please specify):			

- 30. Are there certain criteria that necessitate either a process hazard analysis or a higher level of scrutiny at your company or facility? Check ALL that apply.
 - □ scale-up of chemical activity
 - \Box presence of highly energetic reactions
 - □ presence of highly energetic functional groups
 - \Box gas evolution
 - □ use of highly corrosive and/or hazardous materials
 - □ presence of pyrophoric reagents
 - \Box past history
 - \Box literature precedent
- 31. Which of the following qualitative analysis methods do you use for your reactive hazard evaluations? (Check ALL that apply.)

Brainstorming	
Checklists	
What-if analysis	
HAZOP analysis	
Other (please specify):	
N/A	

- 32. What means or sources are used to ensure that reactive chemical hazard information is considered when conducting a Process Hazard Analysis (PHA)? Check ALL items that apply.
 - □ Safety Data Sheets (SDSs)
 - □ Stoessel Criticality Classification
 - □ NFPA (National Fire Protection Agency) Instability Rating System
 - □ Computer programs and other chemical databases (e.g., CRW, CAMEO, CHETAH, etc.)
 - □ Chemistry descriptions in process manuals
 - □ Detailed process technology packages
 - \square Participation by process development chemist or engineer
 - \Box Participation by plant technical specialist
 - $\hfill\square$ Participation by site reactive chemicals expert
 - \Box Participation by manufacturer/supplier/vendor technical service representative
 - Other (please specify): ______

33. How many people are involved in conducting reactive chemical qualitative hazard evaluations for each process life-cycle phase? Check ONE in each row for ALL items that apply.

	One Individual	Collaborative Team	N/A
R&D (including laboratory, conceptual design/pilot plant)			
Detailed engineering design			
Commercial process operation (including start-up)			
Decommissioning (including maintenance turnarounds)			
Other (please specify):			
Other (please specify):			

- 34. Which of the following describe(s) the ways in which you ensure that all significant reactive chemical scenarios are considered in your reactive chemical testing and qualitative hazard evaluation activities? Check ALL items that apply.
 - □ Brainstorming
 - \Box Literature survey
 - □ Manufacturer/supplier/vendor technical service information
 - □ Previous plant/company incidents
 - \Box Review of industry incident databases
 - □ Checklists
 - □ Material incompatibility matrix
 - Other (please specify): ______
- 35. Do the following personnel receive formalized training in identifying and applying reactive chemical hazards management practices (commensurate with their job roles and responsibilities)? Check ONE in each row for ALL items that apply.

	Yes	Νο
Research & Development		
Technical/engineering		
Design		

	Yes	Νο
Corporate		
Safety		
Management		
Production		
Other (please specify):		
Other (please specify):		

36. Are the nature and severity of reactive chemical hazards in a process considered in determining the interval between performing periodic qualitative or quantitative hazard evaluations for the process (e.g., are PHAs for processes with "higher" reactive hazards updated/revalidated more often than for processes with "lower" assessed reactive hazards)?

□ Yes

 \Box No

a. If "Yes", please describe how you do this:

Identification of Controls/Risk Management Options

37. 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	Consequence Analysis or QRA	Other
Emergency pressure relief capability							
Safe disposal of materials relieved							

	Hazard Evaluation Activity						
Safety Enhancement	Does Not Apply	Peer Practice	Codes & Standards	Design/P&ID Review	Qualitative Hazard Evaluation	Consequence Analysis or QRA	Other
Emergency Cooling systems							
Quench/ dump systems							
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							
Other good practices and design features (please specify):							
Other good practices and design features (please specify):							

- 38. At your facility/company, what outcomes would require a change in the process or prevent a process from moving forward? Check ALL that apply.
 - $\hfill\square$ Stoessel classification above a certain rank
 - □ Large exotherm
 - □ Decomposition detected at or close to the operating temperature

□ Uncontrolled gas generation

 $\hfill\square$ Potential for explosion

- Other (please specify): _____
- 39. Does your facility have an emergency plan of response in case of a reactive chemical incident with the following entities?

	Yes	No	N/A
Local first responders			
Local Emergency Planning Committee			
Local Department of Emergency Management			
Other local government entities (please specify):			
State Emergency Response Commission			
State Department of Emergency Management			
Other state government entities (please specify):			
Local businesses/residents			
Other (please specify):			
Other (please specify):			

- 40. Which of the following best describes the performance of your emergency response plans after reactive chemical incidents?
 - \Box Our facility has never had a reactive chemical incident.
 - \Box Our emergency response plans generally operate according to plan in the case of a reactive chemical incident.
 - \Box Our emergency response plans sometimes operate according to plan in the case of a reactive chemical incident.
 - \Box Our emergency response plans rarely operate according to plan in the case of a reactive chemical incident.

- 41. Which of the following best characterizes the frequency of updates to your facility's emergency response plans?
 - \Box Rare updates
 - □ Occasional updates
 - □ Regular updates
- 42. Does your facility have access to a notification system to alert community members in the case of a reactive chemical incident?
 - □ Yes
 - 🗆 No

Communication and Training

43. 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? Check ALL that apply and add other examples in the extra rows, if needed.

Commun	ication	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				
Safety bulletin				
Informal discussion				
Required reading file				
Documented training				
Operating instructions				

Communication Means	Corporate (or Business Group) to Facility	Engineering (or Technical) to Production	Management to Employees	Outside Party to Company/Facility
Regular safety meetings				
Incident reports				
Other (please specify):				
Other (please specify):				

44. 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 (please specify):		
Other (please specify):		

Renewal and Continuous Improvement

45. Who in your company/facility is responsible for the ongoing implementation and improvement of the reactive chemical hazard management practices/program?

- 46. How often are the reactive chemical hazard management practices/program reviewed or audited for improvement? Check only ONE answer.
 - □ Never
 - \Box Rarely
 - □ Occasionally, when prompted after an incident
 - \Box At regular intervals
- 47. Does your site report and track reactive chemical incidents (including near misses?) Check ALL that apply.
 - \Box At site level
 - □ At corporate or business group level
 - \Box Industry-wide
 - $\hfill\square$ Do not track on a consistent basis

a. Does your site ensure this information is communicated company-wide and retained as part of corporate memory? Please explain.

- 48. Do you share data regarding reactive chemical incidents (including near misses) with trade associations, suppliers/customers, or other manufacturers in your industry?
 - □ Yes
 - □ No
- 49. 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

50. Does your company see the need for an industry-wide database on reactive chemical incidents? (One that is easily accessible to those who need it.)

 \Box Yes

- \Box No
- a. If "yes", would your company be likely to contribute to such a database?
 - \Box Yes
 - □ No

b. Who should maintain such a database?

51. Does your company see the need for an industry-wide database on reactive chemical testing? (One that is easily accessible to those who need it.)

□ Yes

□ No

 \Box No

b. Who should maintain such a database?

52. Does your company see the need for further industry guidance on reactive chemical hazard management issues?

□ Yes

□ No

a. If yes, who has a need for this guidance and how might it be developed? Please explain.

53. Would your company be willing to participate in further discussions concerning reactive chemical hazards and management practices/programs?

□ Yes

□ No

Additional Comments & Feedback

54. Please let us know about your experience filling out this survey.

a. How satisfied were you with the clarity of intent of questions:

□ Very Satisfied

- □ Somewhat Satisfied
- □ Neither Satisfied nor Dissatisfied
- □ Somewhat Dissatisfied
- □ Very Dissatisfied
- b. How easy was it to collect information to complete the survey:
 - □ Very Easy
 - □ Somewhat Easy
 - □ Neither Easy nor Difficult

- □ Somewhat Difficult
- □ Very Difficult
- c. Usefulness of the survey to you (e.g., new ideas, benchmarking):
 - □ Very Useful
 - □ Somewhat Useful
 - □ Neither Useful nor Unhelpful
 - □ Somewhat Unhelpful
 - □ Very Unhelpful
- 55. What other comments or questions do you have that you want us to know? Please enter all information into the box below.