



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

<b>Report:</b>	Improving Reactive Hazard Management
<b>Recommendation Number(s):</b>	2001-01-H-R13 2001-01-H-R14
<b>Date Issued:</b>	October 8, 2002
<b>Recipient:</b>	Society of Chemical Manufacturers & Affiliates (SOCMA), formerly Synthetic Organic Chemical Manufacturers Association
<b>New Status:</b>	R13: Closed – Unacceptable Response R14: Closed – Reconsidered/Superseded
<b>Date of Status Change:</b>	February 11, 2016

### Recommendation Text:

#### **CSB Recommendation No. 2001-01-H-R13:**

*Develop and implement a program for reporting reactive incidents that includes the sharing of relevant safety knowledge and lessons learned with your membership, the public, and government to improve safety system performance and prevent future incidents.*

#### **CSB Recommendation No. 2001-01-H-R14:**

*Work with NIST in developing and implementing a publicly available database for reactive hazard test information. Promote submissions of data by your membership*

### Board Status Change Decision:

#### A. Rationale for Recommendation

After a number of high-consequence incidents resulting from runaway chemical reactions, including the April 21, 1995, explosion and fire at the Napp Technologies specialty chemical plant in Lodi, New Jersey, which killed five workers, and the April 8, 1998, explosion and fire at the Morton International dye manufacturing plant in Paterson, New Jersey, which injured nine, the CSB undertook a comprehensive study of reactive chemical hazard management in the United States.

The CSB noted in its study that, “The SOCMA process safety committee informally shares information on incidents at member facilities, but it does not offer a formal incident reporting mechanism such as the ACC PSCMS [American Chemistry Council Process Safety Code Measurement System].”<sup>1</sup> Consequently, the CSB issued a recommendation to SOCMA to

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<sup>1</sup> *Improving Reactive Hazard Management*, pg. 90

develop and implement a program for reporting and sharing reactive incidents (2001-01-H-R13).

The report concluded that, “There is no publicly available database for sharing lessons learned from reactive incidents...[or] to share reactive chemical test information.”<sup>2</sup> Therefore, the CSB issued a recommendation (e.g., 2001-01-H-R5) to the National Institute of Standards and Technology (NIST) to develop a publicly available database for reactive hazard test information.

The CSB also issued two recommendations (e.g., 2001-01-H-R10 and R14) to two major chemical trade associations, the American Chemistry Council (ACC) and the Society of Organic Chemical Manufacturers Association (SOCMA), to work with NIST in developing a database for reactive hazard test information. This status change summary only addresses the recommendations that the CSB made to SOCMA (e.g., 2001-01-H-R13 and R14).

#### B. Response to the Recommendation

Although numerous attempts have been made by CSB’s Office of Recommendations to persuade SOCMA to take action on Recommendation No. 2001-01-H-R13, SOCMA has not developed or implemented a formal internal system for reporting and sharing reactive incidents for its member companies and has not made that information available to the public or to the government.

Despite SOCMA’s initial noteworthy efforts to publish a white paper and develop a proposal for a publicly available database for reactive hazard test information in conjunction with NIST, substantial legal and resource obstacles were encountered by NIST and the ad hoc group of industry experts who were working on this project that resulted in no further actions being taken to satisfy Recommendation No. 2001-01-H-R14.

#### C. Board Analysis and Decision

As this recommendation has been open for over 14 years with no indication that SOCMA intends to embrace it in any way, according to the provisions contained in CSB Board Order 22, the Board voted to change the status of Recommendation No. 2001-01-H-R13 to: **“Closed – Unacceptable Response.”**

Since the related CSB Recommendation No. 2001-01-H-R5 to NIST has been designated with the status, “Closed - Reconsidered,” there is no process for developing a NIST reactive hazard database to which the SOCMA can contribute. Therefore, the Board voted to change the status of Recommendation No. 2001-01-H-R14 to: **“Closed – Reconsidered/Superseded.”**

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<sup>2</sup> *Improving Reactive Hazard Management*, pp. 99-100