Recommendation Text:

Conduct a survey of members to determine best industry practices for HF handling activities, such as draining equipment, use of open systems, and nonroutine work. Develop best practices guidance as appropriate and communicate it to your members.

Board Status Change Decision:

A. Rationale for Recommendation

On July 20, 2003, there was a release of chlorine gas from the Honeywell refrigerant manufacturing plant in Baton Rouge, Louisiana. The accident resulted in the hospitalization of four plant workers and required residents within a half-mile radius to shelter in their homes. On July 29, 2003, a worker was fatally injured by exposure to antimony pentachloride when a gas cylinder released its contents to the atmosphere. On August 13, 2003, two plant workers were exposed to hydrofluoric acid, and one was hospitalized.

The CSB investigation uncovered common deficiencies in the following management systems:

- Hazard analysis did not ensure a review of all equipment, procedures, and likely scenarios. The safeguards listed were generic and, in many cases, relied too heavily on administrative procedures.
- Non-routine situations were not always recognized and reviewed to ensure that work could proceed safely.
- Work practices at the plant did not always strictly follow written operating procedures.

The CSB report found that HFIP had construction, transportation, storage, and personal protective equipment guidelines for HF, but that it does not have general handling practice guidelines for activities like draining equipment and maintenance preparation. Therefore, the CSB recommended that HFIP survey its members to determine best industry practices and, if appropriate, develop best practices guidance.

B. Response to the Recommendation

HFIP formed a working group with representatives from all eight member companies and two associate member companies to share current practices for HF handling activities. The working
group them aggregated the results of the survey and presented the work and conclusions of the working group at a seminar with nearly 60 suppliers, users, and representatives of all HFIP member companies present. The working group considered the feasibility of creating best practices guidance, ultimately concluding that the variety of situations related to different processes operated under different management systems made guidelines for best practices impractical.

C. Board Analysis and Decision

As the HFIP has surveyed all its members over the course of several in-person working meetings and conference calls, developed and communicated the results of the survey to its eight full and two associate member companies, and considered the feasibility of developing best practice guidance, the Board voted to change the status of Recommendation 2003-13-I-LA-R25 to: “Closed-Acceptable Action.”