



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

Report:	Improving Reactive Hazard Management
Recommendation Number:	2001-01-H-R12
Date Issued:	September 17, 2002
Recipient:	Society of Chemical Manufacturers and Affiliates (SOCMA), formerly the Synthetic Organic Chemical Manufacturers Association
New Status:	Closed – No Longer Applicable
Date of Status Change:	March 31, 2015

Recommendation Text:

Expand the Responsible Care Process Safety Code to emphasize the need for managing reactive hazards. Ensure that:

- *Member companies are required to have programs to manage reactive hazards that address, at a minimum, hazard identification, hazard evaluation, management of change, inherently safer design, and adequate procedures and training.*
- *There is a program to communicate to your membership the availability of existing tools, guidance, and initiatives to aid in identifying and evaluating reactive hazards.*

Board Status Change Decision:

A. Rationale for Recommendation

In August 2000, following its investigation of a serious reactive incident at Morton International, the Board initiated a comprehensive review of reactive hazards nationwide. The CSB determined that approximately 70 percent of reactive incidents occurred in the chemical manufacturing industry. The CSB Improving Reactive Hazard Management Study issued recommendations to reduce the number and severity of such incidents.

Voluntary industry initiatives supplement regulatory requirements. The chemical industry has voluntarily undertaken several initiatives to provide guidance on chemical process safety, including processes involving reactive hazards. However, the CSB study found that at the time the study was conducted, no industry initiatives listed specific codes or requirements for reactive hazard management. The Synthetic Organic Chemical Manufacturers Association (SOCMA)¹ was participating in the Responsible Care program to promote good practices among its member companies in the area of chemical process safety. The CSB recommended that SOCMA enhance its Responsible Care *Process Safety Code* program by including reactive hazards.

¹ At the time the CSB Reactives study was conducted, SOCMA had 300 member companies, representing 2,000 facilities and had been a Responsible Care Partner Association since 1990.

B. Response to the Recommendation

In its response, SOCMA noted that it ceased participation in the American Chemistry Council's Responsible Care program in 2004 and has since made participation in its *ChemStewards* program a requirement for its membership.² SOCMA also pointed out that as the Responsible Care Management System (RCMS) is legally owned by the American Chemistry Council (ACC), the ACC is only organization authorized to make changes to it. Also, while SOCMA's *ChemStewards* program shares some management elements with the ACC Responsible Care *Process Safety Code, ChemStewards*, it is not as prescriptive and therefore is not intended to address specific safety and environmental issues, such as reactive hazards.

C. Board Analysis and Decision

SOCMA stopped using the ACC Responsible Care *Process Safety Code* in 2004 and has no authority to amend its *Technical Specifications*. In addition, although its replacement, the *ChemStewards* program, shares some elements, it is not as prescriptive as the ACC Responsible Care *Process Safety Code* and thus is not structured to evaluate reactive hazards in the manner envisioned by the Board in this Recommendation. Therefore, the Board voted to change the classification of 2001-01-H-R12 to: **"Closed—No Longer Applicable."**

² Small companies (25 million in sales or less) have an option if they want to participate