



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

Report:	Improving Reactive Hazard Management
Recommendation Number:	2001-01-H-R9
Date Issued:	October 8, 2002
Recipient:	American Chemistry Council (ACC)
New Status:	Closed – Reconsidered/Superseded
Date of Status Change:	January 11, 2017

Recommendation Text:

Develop and implement a program for reporting reactive incidents that include 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.

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.

In total, the CSB identified 167 serious accidents in the United States between 1980 and 2001; 48 of these accidents resulted in 108 fatalities. In addition, more than half of these incidents involved chemicals not covered by existing Occupational Safety and Health Administration (OSHA) or Environmental Protection Agency (EPA) standards. While the bulk of incidents were in the chemical manufacturing industry, thirty percent occurred at industrial facilities that use or consume chemicals in bulk quantities.

The CSB noted in its study that the “ACC Process Safety Code Management system (PSCMS), established in 1996, contains data on the type of incident (i.e. fire, explosion, toxic gas), number of injuries, etc., for 1,500 facilities, but no data on causes of accidents or lessons learned. PCMS is primarily designed as a metric for tracking industry performance on process safety incidents; it was never intended to be a lessons learned database. As a result, the CSB issued a recommendation to ACC to develop and implement a program for reporting and sharing of reactive incidents.

B. Response to the Recommendation

In April 2014, ACC informed the CSB that it had implemented an internal system to annually collect a summary of process safety incident data from their members. The data include substantive events that may involve reactive chemicals with an explicit flag in the system to note any reportable incidents that involve a reactive chemical. As a trade organization, ACC's primary focus is collaboration among its companies. As such, ACC did not feel that they were the best organization to provide incident information to either the public or government. However, they did provide alternative organizations that already collect and disseminate the associated information. Information published in the *CCPS Process Safety Beacon* and at the AIChE Global Congress of Process Safety can be obtained and used by the government and the public

C. Board Analysis and Decision

In accordance with the recommendation ACC is internally collecting reactive chemical incidents from its members. They then provided CSB with several more appropriate recommendation recipients that are better postured to share of safety knowledge and lessons learned with the public and government. Consequently, the Board voted to change the status of **Recommendation No. 2001-01-H-R9** to: “**Closed – Reconsidered/Superseded.**”