



MEMORANDUM

Via E-Mail

DATE: October 23, 2003

TO: Firm Clients and Friends

FROM: Bergeson & Campbell, P.C.

RE: OSHA Creates Chemical Reactivity Safety Web Page

On October 21, 2003, the Occupational Health and Safety Administration (OSHA) announced the availability of a web page on chemical reactivity safety, which is intended to help companies reduce injuries, illnesses, and fatalities during chemical manufacturing and operations. The new page, which is available at <http://www.osha.gov/dep/reactivechemicals/index.html>, features information on the recognition, evaluation, and control of chemical reactive hazards, and includes compliance requirements and available training resources. The page also offers free access to a new book by the Center for Chemical Process Safety (CCPS) that includes a compendium of best practices from leaders in chemical processing. OSHA Administrator John Henshaw stated: "There have been too many reminders in recent years just how tragic and catastrophic chemical reactions can be if unpredicted and not properly controlled or contained. Our goal and commitment is to work with chemical safety stakeholders throughout the country to prevent these incidents in the future. The information we're presenting on this new webpage is only a part of OSHA's far-reaching strategy to protect workers in this industry."

The OSHA web page states: "Chemical reactivity presents serious, sometimes catastrophic hazards to workers when the hazard is not thoroughly understood and controlled." According to OSHA, while chemical reactions are key to the chemical manufacturing industry, safely conducting these reactions "is not only vitally important to employee health and safety, it assures continued operation and adds value to employer's businesses." OSHA's web page provides information on many aspects of safe chemical operations, including reactive hazards, compliance requirements, available training resources, reports on reactive chemical incidents, and references to other sources of information. The web page also includes a link to the Chemical Reactivity Worksheet prepared by the Office of Response and Restoration of the National Oceanic and Atmospheric Administration. The worksheet, which is available on the Internet at



Memorandum to Firm Clients and Friends
October 23, 2003
Page 2

<http://response.restoration.noaa.gov/chemaids/react.html>, is a program that allows users to find out about the reactivity of substances or mixtures of substances. The worksheet includes a database of reactivity information for more than 6,000 common hazardous chemicals and details on what dangers can arise during chemical mixing.

Henshaw unveiled OSHA's multi-faceted strategy in chemical reactive safety at the 18th Annual International Conference held by the CCPS. In addition to the new web page, Henshaw announced that OSHA is working on additional guidance on hazard communication, including material safety data sheets, and will also revise the compliance directive for the process safety management standard. Henshaw stated that OSHA will participate in the American Institute of Chemical Engineers' Reactivity Management Roundtable this month and is also developing an alliance with a number of groups in the chemical industry. For more information on the regulation of reactive chemicals, please see Bergeson & Campbell, P.C.'s September 29, 2003, memorandum, which is available on the Internet at <http://www.lawbc.com/updates/092903-cao.pdf>.

We hope this information is helpful. As always, please call if you have any questions.