

Procedure for Updating a Plant/Department Chemical and Physical Agent Inventory

The OSHA HAZCOM Standard requires a "*list of chemicals*". Dow utilizes the Chemical/Physical Agent Inventory (CPAI) to fulfill this requirement. Updating the CPAI is part of the LAD Industrial Hygiene annual activities. Having *one* list of chemicals is preferable and can serve the needs of the whole operating unit. Therefore, it is important to make the CPAI as complete as possible. Updating the CPAI begins the planning stage for your plant/department annual Industrial Hygiene program.

Steps for the Plant IH Contact

1. Work with the Operations personnel to obtain the following information:

Use a RED PEN to mark changes!

- a. Scratch out any chemicals no longer used. (Also, be sure that all of that material is properly removed from the plant site). Remember to compare the CPAI with what is reported under SARA 312. In order to control the number of pages in the inventory, such entries as lab chemicals and maintenance items should be limited to only those job classifications that actually work with them.
- b. Write in any new chemicals that are not on the CPAI. Indicate the proper material usage code as defined on Appendix B found in this section. If it is supplied from outside Dow, send Industrial Hygiene a copy of the Supplier's MSDS's, as this is needed to request a Dow Registry Number. By having the chemical on the CPAI list you do not have to retain the obsolete MSDS for 30 years as required by OSHA 29 CFR 1910.20.

{Appendix A: *Addition/Deletion of a Chemical from the CPAI* should be used at the time a new chemical is received or is removed from your plant/department. A copy of the completed form along with the corresponding MSDS should be sent to Industrial Hygiene, 3502W.}

- c. Determine the Degree of Exposure (NEG, LOW, MOD, or HIGH) for any new addition, as well as any other item, if there has been a change in the way the material is handled.
2. Determine the Priority Rating (1-5) with assistance from your Industrial Hygienist.

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- a. If an item is 1, 2, or 3, make sure this is consistent with the annual report recommendations *and* is included in the yearly monitoring schedule. Sometimes a 1, 2, or 3 may be a judgment (such as with caustic or acid) decision, where air monitoring is not the only consideration, *but* special protective equipment is required because of the acute hazard to the skin and eyes (or possible skin absorption).
 - b. A "4" rated item will rarely be included on the monitoring program, but more likely a "4" rating will be determined from past monitoring data or a judgment decision.
3. It is important that the job descriptions match up with the job classifications used on the CPAI. In those cases where several job activities apply to one generalized job classification, such as "Operation Specialist", try to organize those as sub-headings under the one general heading (Example; **Operation Specialist: Extruder Operator, Compressor Operator, Power Operator, Furnace Operator, Etc.**). A list of job classifications is found in this section as Appendix C. Refer to Section 16 of the IH Plant Manual for further assistance.
4. Return the "marked up" copies to your industrial hygienist soon and the computer file will be updated and the finalized CPAI will be returned to you to be filed in this section.

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