

CH2M HILL Hanford Group, Inc.	Manual	ESHQ
HAZARD COMMUNICATION	Document	TFC-ESHQ-S_IH-C-02, REV A-9
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[Ownership matrix](#)

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1.0 PURPOSE AND SCOPE

(7.1.1, 7.1.2, 7.1.4, 7.1.5)

This procedure describes the processes that are used to communicate hazardous material information to all personnel who work with hazardous materials during any activity in the tank farms. The procedure meets all of the requirements and criteria of the Occupational Safety and Health Administration's (OSHA) 29 CFR 1910.1200, "Hazard Communication."

This procedure applies to all Tank Farm Contractor (TFC) personnel and subcontractors, except for personnel who work in laboratories that have a written safety program that complies with 29 CFR 1910.1450, "Laboratory Safety."

2.0 IMPLEMENTATION

This procedure is effective on the date shown in the header.

3.0 RESPONSIBILITIES

(7.1.5)

3.1 Line Management

- Promotes the selection and use of chemicals that minimize hazards (especially where non-toxic, non-hazardous materials are available).
- Ensures that material safety data sheets (MSDSs) are readily accessible to employees in their work area(s) during each shift.
- Ensures that employees receive information and training on hazardous chemicals in their work areas at the time of their initial assignment.

3.2 Industrial Hygiene

- Assists employees in obtaining MSDSs.
- Answers questions regarding chemical constituents and substitutions.

NOTE: Industrial hygiene subject matter expert (SME) serves as the interpretative authority for this procedure.

3.3 Training Manager

(7.1.3)

- Ensures employees are provided training to comply with OSHA Hazard Communication training requirements. Depending on employee job duties, this training may include: Hanford General Employee Training, HGET (000001 or 000005), Tank Farm Orientation (350710), Facility Emergency/Hazard Identification Checklist, FEHIC (03E060), 24-Hour TSD Hazardous Waste (031110) or 40 Hour Haz Waste Worker (031220).

4.0 PROCEDURE

(7.1.1, 7.1.2, 7.1.4, 7.1.5)

This procedure does not apply to the following general categories of materials: (For additional clarification, consult the industrial hygiene subject matter expert.)

- Hazardous wastes/substances regulated by the Environmental Protection Agency under the Resource Conservation and Recovery Act and the Comprehensive Environmental Response Compensation and Liability Act, which includes the chemical and radiological wastes in tank farms
- Personal use items, such as foods/beverages, consumer products, cosmetics, drugs, and first aid supplies
- Manufactured articles that will not release a hazardous chemical under normal or anticipated conditions of use
- Tobacco or tobacco products
- Wood or wood products, except wood dust
- Ionizing and non-ionizing radiation hazards
- Biological hazards.
- Potable and non-potable water supplies. (Water sold by a chemical manufacturer/distributor for specific analytical purposes is covered by the procedures. Consult industrial hygiene subject matter expert if further clarification is required.)

4.1 Purchasing Potentially Hazardous Materials

See [Figure 1](#) for procedure flowchart.

- | | |
|-----------------------|--|
| Material Coordinators | <ol style="list-style-type: none">1. Obtain approval from Industrial Hygiene in accordance with TFC-BSM-CP CPR-C-01 and TFC-BSM-CP CPR-C-06 for the purchase of a potentially hazardous material.2. If an approved MSDS is not on file with the Fluor Hanford (FH) MSDS administrator, obtain the MSDS and submit to the FH MSDS administrator. |
| Industrial Hygiene | <ol style="list-style-type: none">3. Use Attachment A to perform hazard assessment.4. If the hazard assessment indicates the material should not be used, inform the requestor (through the material coordinator) that the purchase request has been rejected. |

- Requestor
5. If the hazard assessment indicates the material being purchased contains a carcinogen, complete the following substeps.
 - a. Inform the requestor that the purchase of a carcinogenic material must be in accordance with [TFC-ESHQ-IH-STD-11](#).
 - b. Purchase the material in accordance with [TFC-ESHQ-IH-STD-11](#).

- Industrial Hygiene
6. Communicate any new information identified in the hazard assessment, including any materials that may be exempt from this procedure.

NOTE: Communication may be by e-mail, memo, or inclusion in a ~~Job~~ [Worksite](#) Hazard Analysis.

4.2 Receiving Hazardous Materials

See [Figure 2](#) for procedure flowchart.

- Material Coordinators
1. Receive material shipment.
 2. Verify shipment is a material ordered per Section 4.1.
 3. Ensure material is moved to prearranged storage location.
 4. Turn material over to requesting organization.
- Line Manager or Delegate
5. If the material has been previously approved (i.e., MSDS already on file with organization and FH Administrator) go to Section 4.2, step 8.
 6. If the MSDS included with the shipment is an updated edition of the MSDS that is not on file with the FH MSDS administrator, complete the following substeps.
 - a. Send a copy of the updated MSDS to FH MSDS administrator for inclusion in the MSDS database.
 - b. Place a copy of the updated MSDS in the facility Right-to-Know Station (see Section 4.3) as soon as it is entered into the FH MSDS database.
 7. If the material is suspected of not being approved, or there is no MSDS available for the material, complete the following substeps.
 - a. Stage the material with a label that states “No MSDS, do not use.”

- b. Contact material coordinator and Industrial Hygiene to clarify status of material.
8. Review the original manufacturer/importer/distributor label for the following required information:
 - The identity of the hazardous material (i.e., product name)
 - Associated health and safety hazards.
9. If an original container label is illegible or does not contain the required information, complete Section 4.4, step 2, as appropriate.
10. Place material into service.

4.3 Establishing and Maintaining “Right to Know” Stations

See [Figure 3](#) for procedure flowchart

Line Manager/Delegate

1. Develop (if not already in existence) a list of all of the hazardous materials known to be present in the work area/facility. Include the following information:
 - Identification of material as referenced on the MSDS
 - Manufacturer of the material
 - Current Hanford MSDS number
 - Material storage (facility) location

NOTE: The Safety and Health Programs ~~hazardous materials specialist~~[Industrial Hygienist](#) can provide assistance in the development of the list.

2. Update the list within 30 days of receipt of a new hazardous material.
3. Obtain the most recent MSDS for all of the materials on the list (see Section 4.2, step 6). MSDSs may be obtained directly from the Hanford MSDS database, which is accessible from the RMIS database.

NOTE: If access to the RMIS database is not available, MSDSs may be requested from the following sources:

- Industrial hygienist
- ~~Hazardous material specialist~~
- E-mail at [*msds requests](#).

4. Complete the TFC Hazard Communication - Implementation Summary form shown in [Attachment B](#).
5. Establish a Right-to-Know Station (if not already in existence) to provide employees with the following required information about materials used in the work place. Locations of Right-to-Know Stations and chemical storage areas are shown in [Attachment C](#).
 - TFC Hazard Communication – Implementation Summary form
 - A list of hazardous materials for the area/facility
 - A copy of this procedure
 - MSDSs for the materials listed.

NOTE: MSDSs may be available in notebooks, through computer access (with printer capability), or through a designated responsible person.
6. Perform an audit at least once per year of the Right-to-Know Station to ensure that it contains the required information.
7. If an audit was performed, complete a new TFC Hazard Communication - Implementation Summary form shown in [Attachment B](#) and post the form at the Right-to-Know Station.
8. If there is a change in line management, complete a new TFC Hazard Communication - Implementation Summary form shown in [Attachment B](#) and post the form at the Right-to-Know Station.

4.4 Maintaining Original Material Container Label Information

See [Figure 4](#) for procedure flowchart.

- | | |
|--------------|--|
| Line Manager | 1. Perform periodic review of hazardous material container labels used or stored in the facility/project. Review labels for legibility and content. |
| Employees | 2. Before commencing work with a hazardous material, ensure the container has the required label information by completing the following substeps. <ol style="list-style-type: none"> a. Review the label for legibility and content of the following required information: <ul style="list-style-type: none"> • Name and address of the manufacturer, importer or other responsible party • Identity of the material (i.e., product name) |

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- Associated health and safety hazards, including target organs
- And any other information required by applicable OSHA substance specific standards.

- b. If an original container label is illegible or does not list the required information, re-label the container with a completed Hanford Hazard Label in accordance with [Attachment D](#). Actual labels may be obtained from the TFC Sign Shop in 11" x 14", 5" x 7", 2.75" x 3.75" and 1" x 1.5" sizes.

NOTE: The label described in [Attachment D](#) is a new label that is superseding the old hazardous materials label. The old label will be acceptable until June 30, 2003, providing that it is already attached to a container and that it contains all of the information required in this procedure.

- c. If not enough information is available to fully complete the Hanford Hazard Label, complete the following substeps.
- 1) Ensure the container is taken out of service.
 - 2) Take one of the following actions, as appropriate.
 - Return the material to the vendor.
 - Have the contents analyzed to ascertain the missing information.
 - Handle the material as unknown waste.

NOTE: All Hanford workers that have access to HLAN may access RIM Information Locator System (RILS). This site provides real time access to MSDS and hazard information required for Hanford hazard levels. To access this information go to the front page of the Hanford Intranet and at the end of the address <http://www.rl.gov/rils>. On the left hand side of the next page, select MSDS.

3. If a question of proper labeling occurs, contact Industrial Hygiene ~~or hazardous materials specialist~~ for assistance.

4.5 Transferring Hazardous Material to a Secondary Container

Employees

1. If chemicals are transferred from the original container to a secondary container, complete and affix a Hanford Hazard label to the secondary container in accordance with [Attachment D](#). Complete all fields in the Hanford Hazard label - any labels with missing information are considered non-compliant.

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NOTE: Chemicals transferred to portable containers for immediate use do not require a full label but must have a content identification on the container.

NOTE: The label described in [Attachment D](#) is a new label that is superseding the old hazardous materials label. The old label will be acceptable until June 30, 2003, providing that it is already attached to a container and that it contains all of the information required in this procedure.

5.0 DEFINITIONS

No terms or phrases unique to this procedure are used.

6.0 RECORDS

No records are generated in the performance of this procedure.

7.0 SOURCES

7.1 Requirements

1. 29 CFR 1910, Subpart Z, "Toxic and Hazardous Substances." (S/RID)
2. 29 CFR 1910.1200(h)(3). (S/RID)
3. 29 CFR 1910, Section 1450, "Occupational exposure to hazardous chemicals in laboratories," paragraph (f), "Employee information and training", paragraphs (1), (2), and (4)(I).
4. 29 CFR 1926, Subpart Z, "Toxic and Hazardous Substances." (S/RID)
5. RPP-MP-003, "Integrated Environment, Safety, and Health Management System Description for the Tank Farm Contractor."

7.2 References

1. DOE O 440.1A, 03-27-98, Attachment 2, Section 12.a.
2. DOE O 440.1A, 03-27-98, Attachment 2, Section 18.i.
3. 29 CFR 1910, Subpart H, "Hazardous Materials," Section 120, "Hazardous Waste Operations and Emergency Response."
4. American Conference of Governmental Industrial Hygienists, "Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment."
5. TFC-BSM-CP_CPR-C-01, "Purchasing Card (P-Card)."
6. TFC-BSM-CP_CPR-C-06, "Procurement of Items (Materials)."
7. TFC-ESHQ-IH-STD-11, "Carcinogen Control."

- | 8. [TFC-PLN-34, "Industrial Hygiene Exposure Assessment Strategy."](#)

Figure 1. Purchasing of Potentially Hazardous Material Flowchart.

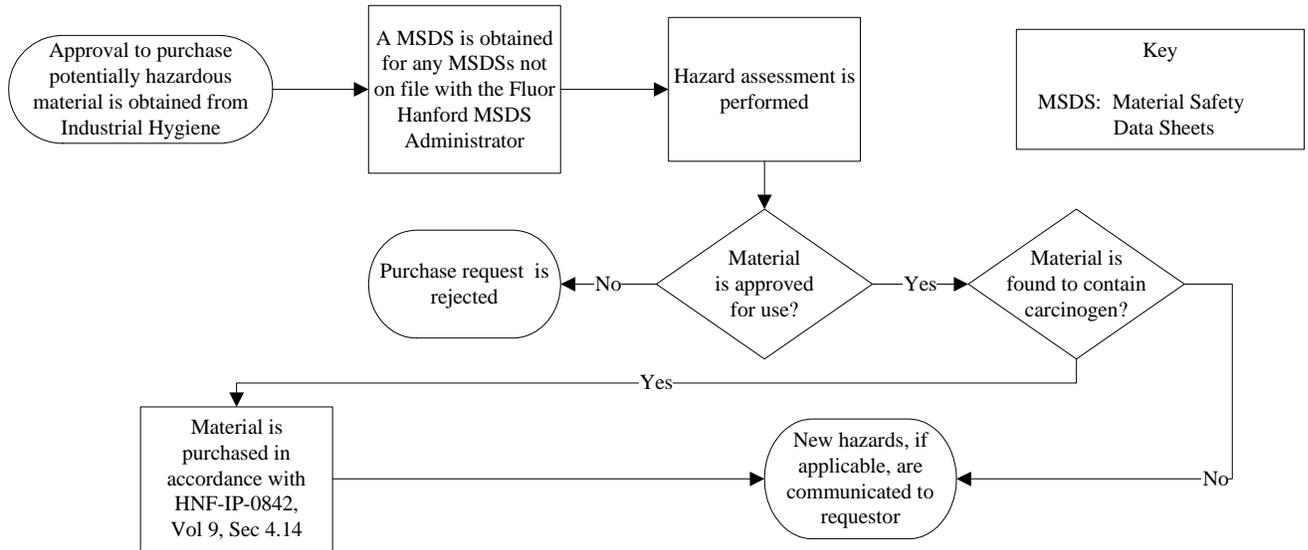


Figure 2. Receiving Hazardous Material Flowchart.

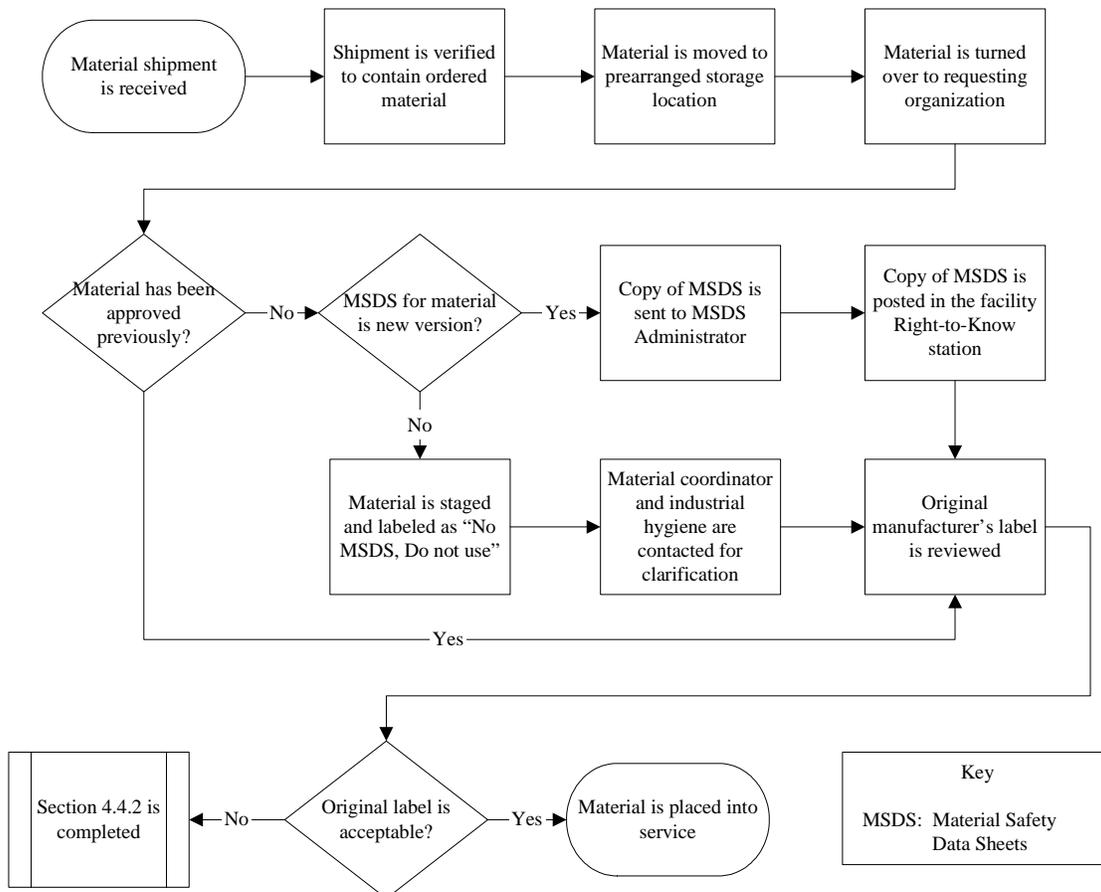


Figure 3. Establishing and Maintaining “Right-to-Know” Stations Flowchart.

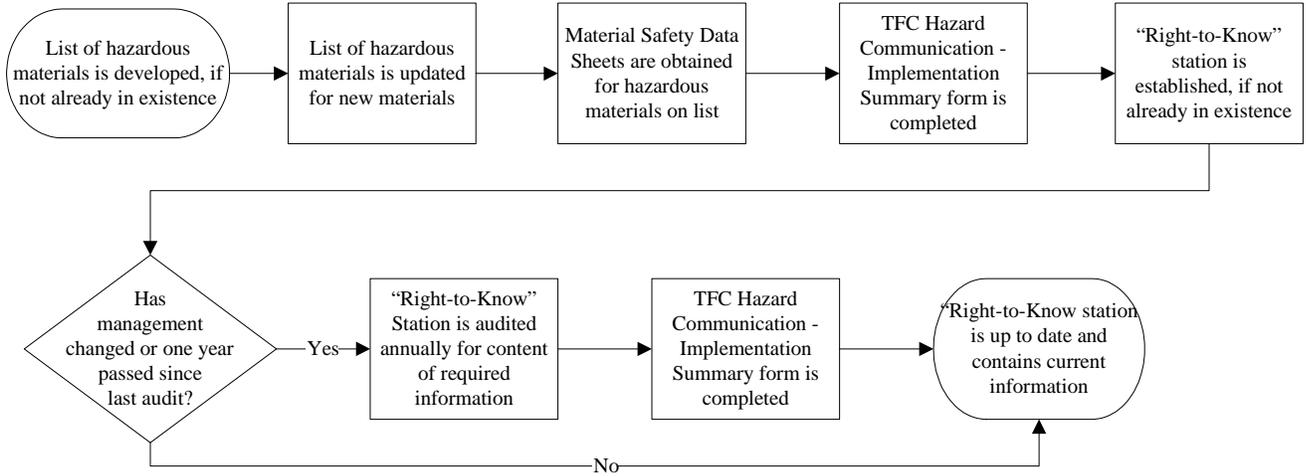
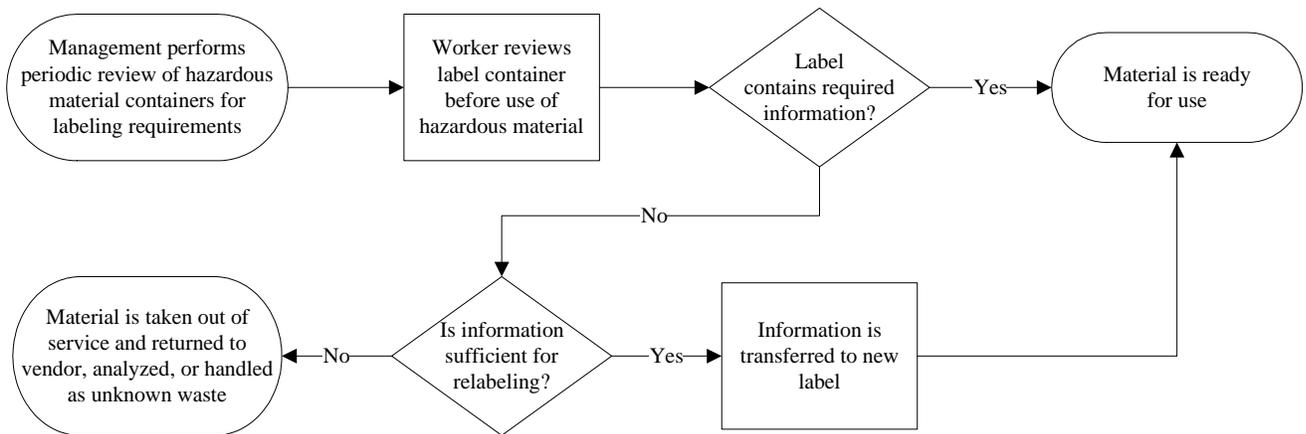


Figure 4. Maintaining Original Material Container Label Flowchart.



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ATTACHMENT A - TECHNICAL CRITERIA FOR HAZARD COMMUNICATION

Carcinogen: A chemical is considered to be a carcinogen if any one of the following conditions exist:

- OSHA has designated it as a carcinogen in 29 CFR 1910, Subpart Z.
- It has been identified by the American Conference of Governmental Industrial Hygienists (ACGIH) as an A1 (Carcinogen) or A2 (Suspected Human Carcinogen).
- It has been evaluated by the International Agency for Research on Cancer (IARC) and found to be a carcinogen or potential carcinogen (Group 1, Group 2A or Group 2B).
- It is listed as a carcinogen or potential carcinogen in the “Annual Report on Carcinogens” published by the National Toxicology Program (NTP) (latest edition).

NOTE: Assume mixtures present a carcinogenic hazard if they contain at least 0.1 percent in volume or weight of a carcinogen.

Hazard Assessment (Chemical):

The Industrial Hygiene Exposure Assessment Strategy (TFC-PLN-34) provides guidance for conducting the hazard assessment. The purpose of the hazard assessment is to fulfill OSHA and DOE O 440.1 requirements to determine if the chemical is a hazardous chemical per 29 CFR 1910.1200 definitions, to determine if it is a carcinogen to be controlled per TFC-ESHQ-IH-STD-11, to determine if substitution with a less hazardous chemical is feasible, to assure that the hazards are communicated to affected employees, to plan for necessary industrial hygiene assessments and/or exposure monitoring, to determine appropriate administrative and/or engineering controls and to determine appropriate personal protective equipment needs. This analysis must ensure that the planned hazardous chemical use falls within the established “safety envelope” of the facility/project. It can be accomplished through judicious use of professional judgment combined with knowledge of the facility/operations and hazard controls. Where appropriate, and when employee exposure is anticipated, the hazard assessment may be documented via such means as baseline hazard assessments, Job Hazard Analysis, etc.

Hazardous Chemical: means any chemical that is a physical hazard or a health hazard.

1. Consider chemicals listed in these publications to be hazardous:
 - American Conference of Governmental Industrial Hygienists, “Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment” (latest edition)
 - OSHA 29 CFR 1910, Subpart Z, “Toxic and Hazardous Substances.”
2. Consider a chemical to be hazardous if the material safety data sheet or other recognized resource, such as National Institute for Occupational Safety and Health (NIOSH) recommendations, indicates the chemical or product possesses any of the following hazard indicators.

ATTACHMENT A - TECHNICAL CRITERIA FOR HAZARD COMMUNICATION (cont.)

<ul style="list-style-type: none"> • Highly toxic • Other hazard indicators • Carcinogenic • Oxidizer • Chronically toxic • Peroxide or peroxide former • Combustible liquid • Poison • Compressed gas • Polymerization can occur • Corrosive • Reactive • Explosive • Reproductive hazard • Flammable liquid 	<ul style="list-style-type: none"> • Strong acid (low pH<2) • Hazardous decomposition products • Strong base (high pH>12) • Highly toxic • Target organ effect indicated • Incompatible storage • Teratogenic • Eye/skin/respiratory irritant • Toxic • Low temperature storage • Unstable/reactive • Mutagenic • Water reactive • Sensitizer • Flammable solid.
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Information (Employees): Per OSHA criteria, employee hazard communication information is the following:

(7.1.3)

- The requirements of 29 CFR 1910.1200
- Any operations in their work area where hazardous chemicals are present, and
- The location and availability of this procedure (the written Hazard Communication Program) including the required list(s) of hazardous chemicals, and MSDSs (e.g. Right to Know Station).

Training: Employee training shall include at least:

(7.1.3)

- Methods and observations that may be used to detect the presence or release of hazardous chemicals in the work area (such as continuous monitoring devices, visual appearance, and odors)
- Safe work practices for the chemical and physical agents present in their work place and work area
- What controls are in place to ensure exposures are reduced below OSHA established limits or limits set by the American Conference of Governmental Industrial Hygienists (ACGIH) (whichever is most restrictive)
- How to safely perform non-routine (infrequent, unfamiliar, or out of the ordinary) tasks involving hazardous chemicals or physical agents
- Hazards associated with chemicals in overhead and other piping systems
- Information about the physical and health hazards of chemicals in the work area

ATTACHMENT A - TECHNICAL CRITERIA FOR HAZARD COMMUNICATION (cont.)

- Measures that the employee can use to protect themselves from the hazards, including specific written procedures to follow and safety requirements
- Hazards they may be exposed to when working on or near another work site controlled by other employees or employers
- The details of this program, including an explanation of the labeling system, the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

ATTACHMENT B – TFC HAZARD COMMUNICATION – IMPLEMENTATION SUMMARY

TFC HAZARD COMMUNICATION – IMPLEMENTATION SUMMARY

FACILITY COVERED: []
Print AREA / FACILITY NAME in this space

MANAGER RESPONSIBLE FOR HAZARD COMMUNICATION IMPLIMENTATION AT THIS FACILITY:
[]
Print LINE MANAGER'S NAME in this space

THE **WORKER RIGHT-TO-KNOW STATION** FOR THE ABOVE NOTED FACILITY IS LOCATED AT:
[] AND CONTAINS THE FOLLOWING DOCUMENTS:
Print LOCATION OF WORKER RIGHT-TO-KNOW STATION in this space

- A COPY OF THE CH2M HILL HANFORD GROUP WRITTEN HAZARD COMMUNICATION PROCEDURE (TFC-ESHQ-S_IH-C-02)
- A CURRENT LIST OF HAZARDOUS CHEMICALS LOCATED IN THIS FACILITY
- CURRENT MATERIAL SAFETY DATA SHEETS FOR EACH CHEMICAL IN THE ABOVE LIST

THE INDIVIDUAL TASKED WITH MAINTAINING THIS STATION IS: []
Print INDIVIDUAL'S NAME in this space

ALL PRODUCTS CONTAINING HAZARDOUS CHEMICALS MUST BE LABELED WITH THE ORIGINAL MANUFACTURER'S WARNING LABEL OR A HANFORD HAZARD LABEL.

ANY VENDOR, CO-CONTRACTOR OR SUB-CONTRACTOR MUST CONTACT CENTRAL COMMAND AND CONTROL PRIOR TO PERFORMING WORK AT THIS FACILITY THAT MAY EXPOSE FACILITY PERSONNEL TO CHEMICAL HAZARDS.

BEFORE USING ANY PRODUCT THAT IS NOT ON THE INVENTORY LIST IN THIS FACILITY, CONTACT THE INDIVIDUAL MAINTAINING THIS RIGHT-TO-KNOW STATION!!

Signature _____
LINE MANAGER Identified Above

Date _____

*This form must be reviewed and signed annually by the responsible manager to validate responsible individuals

**ATTACHMENT C - LOCATION OF TFC WORKER RIGHT-TO-KNOW STATIONS AND
CHEMICAL STORAGE AREAS**

Station Location	Responsible Manager
242-A Evaporator Facility	WFO Shift Operations Manager
272-AW Maintenance Shop	WFO Maintenance Manager
272-S Paint Shop	CO Maintenance Paint/Insulation Manager
272-S Sign Painter Shop	CO Maintenance Paint/Insulation Manager
272-S Insulation Shop	CO Maintenance Paint/Insulation Manager
616 Building	Waste Management Services Manager
2101-HV Warehouse	CO Maintenance Manager
2101-M Vent & Balance	Manager, Vent & Balance
2704-HV IH Shop	Environmental Health Program Manager
2704-HV Receiving Area	2704-HV Facilities Manager
2713-WB	Retrieval Operations Manager
2715-AW Operations Storeroom	272-AW Operations Field Supervisor
2750-E Receiving Area	2750-E Facilities Manager
MO-979	WFO Radiological Control Manager

Key:

WFO: Waste Feed Operations

CO: Closure Operations

ATTACHMENT D – HANFORD HAZARD LABEL

Hanford Hazard Label Instructions

NOTE: All fields in the Hanford Hazard label are mandatory! The only source for all required MSDS Hanford Hazard Label information is the RIM Information Locator System (RILS), or when RILS is unavailable, the MSDS Administrator (376-2557). Labels with any missing information will be considered non-compliant.

1.	Product Name: MFG: Hazard Rating Date:	1.	Block 1 requires three fields of information (as provided by the MSDS Administrator): <ul style="list-style-type: none"> Chemical/Product Name, including Product code/number if applicable Chemical/product MFG. (Manufacturer or Distributor) Hazard rating Date 															
2.	M.S.D.S. NO. NFPA 704	2.	Block 2 requires the six digit Hanford MSDS Number only. NFPA 704, is for information only.															
3.	HEALTH <input type="checkbox"/>	3.	Block 3 requires the NFPA Hazard Severity rating number for HEALTH , as provided by the MSDS Administrator.															
4.	FLAMMABILITY <input type="checkbox"/>	4.	Block 4 requires the NFPA Hazard Severity rating number for FLAMMABILITY , as provided by the MSDS Administrator.															
5.	REACTIVITY <input type="checkbox"/>	5.	Block 5 requires the NFPA Hazard Severity rating number for REACTIVITY , as provided by the MSDS Administrator.															
6.	Specific Hazard	6.	Block 6 requires the Specific Hazard(s) (as identified in Block 9 of label) that may apply (as provided by the MSDS Administrator).															
7.	Target Organ	7.	Block 7 requires Target Organ(s) , as provided by the MSDS Administrator.															
8.	<table border="1"> <thead> <tr> <th colspan="5">HAZARD SEVERITY</th> </tr> <tr> <th>0</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>MINIMAL</td> <td>SLIGHT</td> <td>MODERATE</td> <td>SERIOUS</td> <td>SEVERE</td> </tr> </tbody> </table>	HAZARD SEVERITY					0	1	2	3	4	MINIMAL	SLIGHT	MODERATE	SERIOUS	SEVERE	8.	Block 8 for information only placed in Blocks 3, 4, 5, (do not circle).
HAZARD SEVERITY																		
0	1	2	3	4														
MINIMAL	SLIGHT	MODERATE	SERIOUS	SEVERE														
9.	<table border="1"> <tbody> <tr> <td>OX</td> <td>A</td> <td>B</td> <td>W</td> <td>CA</td> </tr> <tr> <td>Oxidizer</td> <td>Acid</td> <td>Base</td> <td>Use no Water</td> <td>Carcinogen</td> </tr> </tbody> </table>	OX	A	B	W	CA	Oxidizer	Acid	Base	Use no Water	Carcinogen	9.	Block 9 for information only (to be placed in Block 6, as provided by the MSDS Administrator).					
OX	A	B	W	CA														
Oxidizer	Acid	Base	Use no Water	Carcinogen														