

Chemical Acquisition and Use Issues

April 8, 2008

2008-RL-HNF-0005

Tracking No: 890

Summary: Weaknesses in the Chemical Management System allowed the acquisition of a paint product which was not the one evaluated for procurement. No MSDS for the acquired product is contained within the Site MSDS tracking system. The process used to procure the paint product revealed weaknesses in the project's chemical acquisition process. Organizations should review their processes to identify weaknesses in the chemical procurement process and build in additional defenses to prevent recurrence.

Discussion of Activities: A series of events involving the acquisition of paint products revealed weaknesses in the projects' chemical acquisition process. These resulted in the following: receipt of chemical products for which the hazards had not been assessed per procedural requirements; employees using a product without reviewing the applicable MSDS or ensuring the correct MSDS was readily available.

Analysis: During a routine chemical storage area inspection a new product was identified. It was obvious a portion of the product had been used. Further review found no MSDS in the Site MSDS program for the new product. The vendor product numbers used to place the P-card order for this material referenced the paint color tint numbers vice the paint base number which was used to perform the pre-procurement evaluations.

No adverse consequences were seen as a result of this event. However, if the product contained constituents of concern then the potential for exposure or failure to update the involved employee's Employee Job Task Analysis (EJTA) was possible.

Less than adequate communication between the requester of a chemical product, the chemical management point of contact, the material coordinator, and the supplier has resulted in the acquisition and receipt of paint products other than what was specified during the pre-procurement evaluations.

Recommended Actions:

- Chemical Management Specialists should provide an overview of the chemical management requisition and hazard communication requirements to project personnel.
- Chemical Management administrative procedures should be reviewed and revised as necessary to clearly define roles and responsibilities within the chemical acquisition process.
- A Chemical Procurement Screening Form can be developed or reviewed, as applicable, for adequacy and clarity to prevent the ordering of non-evaluated products.

Work Function: Chemical Management, Procurement

Hazards: Personnel Exposure

ISM Core Functions: Analyze Hazards, Develop/Implement Controls

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References: 2004-RL-HNF-0011