

Diller Phosgene Registry

Participant Questionnaire Results – 2009¹

1.	How many different phosgene producing/handling facilities does your company have in the U.S.?	<p>Three out of the eight Phosgene Medical Task Group responses reflected only one production site. Three responses listed two production sites. Two responses listed three production sites.</p> <p>A total of 15 phosgene production facilities in the US are participating in the Diller Registry.</p>
2.	Are all of your U.S. facilities participating in the Diller Registry? If not, please identify how many are not participating and explain.	<p>All of the Phosgene Medical Task Group member facilities are participating in the Diller Registry and this reflects that all the companies participating in the Diller Registry have all of their phosgene facilities reporting into the Registry</p>
3.	For each different facility identified in question 2 describe the policy/procedures used to identify phosgene exposures that are reported to the Diller Registry.	<p>Company policies in place to support Diller Registry include the following:</p> <p>Medical Phosgene Procedure for Nurses: Initial and follow up documentation for the Diller Phosgene Incident Registry is to be completed with every Phosgene exposure.</p> <p>Badges checked daily, visitors sign in and out of unit, and badges are recorded on log sheet, any change in color is reported to Unit Supervisor and safety for evaluation. Phosgene Exposure Questionnaire filled out. Submitted to Diller Registry by the Unit Supervisor or the Safety Department.</p> <p>Plant procedure requires all employees to wear badges and requires reporting all 'badge' discolorations and other exposure incidents to Health Services department. Health Services medical staff collect the information for reporting into the Diller Registry.</p> <p>All phosgene dosimeter badge color changes are investigated to determine if the</p>

¹ All the members of the Phosgene Medical Task Group are participating in the Diller Registry. The members include VanDeMark Chemical Inc, BASF Corporation, Chemtura, The Dow Chemical Company, DuPont, Bayer, Huntsman, and SABIC Innovative Plastics.

		<p>color change was in fact due to exposure to phosgene. Also, possible exposures to phosgene where a badge was not worn, if any, are investigated. All personnel potentially exposed to phosgene and all personnel wearing a phosgene badge which had any color change are medically evaluated. All/any such exposures where phosgene was confirmed to be present and the person was not wearing a respirator with a second colorimetric dosimeter tab which showed an absence of exposure are reported to the ACC Diller Registry.</p> <p>All unprotected phosgene exposures must report to the on-site Medical facility for observation and documentation. All of these exposures are reported to the Diller Registry.</p> <p>All personnel working within designated phosgene areas wear the dosimeter badges that are monitored for phosgene exposures. Personnel must report any indication of an exposure to medical for further evaluation and determination of follow-up requirements. Any phosgene exposures will be reported to Diller Registry by the Medical Department.</p>
4.	<p>Do the procedures identify ALL unprotected exposures as identified by the Diller Registry: 1. Badge turned color while not wearing respirator; 2. No badge reading available at time of suspected, unprotected exposure; 3. Workers exhibiting acute symptoms after any suspected phosgene exposure.</p>	<p>All Phosgene Medical Task Group members answered "Yes."</p>
5.	<p>Identify the job title of the person(s) responsible at each site for filling out the Diller questionnaire and reporting for each phosgene facility.</p>	<p>The following persons were identified as the responsible staff for the Diller questionnaire and reporting for each phosgene facility:</p> <ul style="list-style-type: none"> EHS Department Manager Occupational Health Nurse Supervisor Contractor Registered Nurse Production Supervisor, Safety Department Personnel Site Physician Certified Industrial Hygienist Medical Director

6.	Are audit procedures in place to verify that phosgene exposures are being identified and reported to the Diller registry? Please explain audit and any other programs in place that would verify phosgene exposure reporting.	<p>Six of the eight Phosgene Medical Task Group responses indicated that they do have an audit procedure in place. One response indicated that while there is no audit procedure in place to verify that phosgene exposures are reported to the Diller Registry, all phosgene exposures are investigated and audited. One response indicated that they do not have an audit procedure in place.</p> <p>The following are examples of audit programs currently in place:</p> <p>Monthly Safety Committee Audits; Incident Reporting Procedure.</p> <p>Badges checked daily, visitors sign in and out of unit, and badges are recorded on log sheet, any change in color is reported to Unit Supervisor and safety for evaluation.</p> <p>Safety logs are reviewed to identify any potential phosgene exposures and compared with Diller reporting for that time period.</p> <p>Reporting procedures are reviewed at each site during internal second-party audits performed on a triannual basis by a team made up by personnel responsible for phosgene technology, operations, and emergency response/first aid at their sites. Documented first party audits are performed bi-annually. Investigations are documented with corrective actions tracked to completion.</p> <p>Quarterly procedures audits, quarterly staff safety and housekeeping inspections, Corporate EHS audits, OSHA voluntary protection program audits.</p>
----	---	---