**Chemical Review Process**

START HERE

Is the chemical approved (i.e. in the database with an accompanying SDS) for the specific location where it will be?

- NO
  - Obtained the chemical composition from the chemical manufacturer or the contractor, if applicable.
  - Do you know the composition of the chemical?
  - NO
    - Have you obtained an SDS for the chemical?
    - NO
      - Obtain an SDS from the chemical manufacturer or the contractor, if applicable.
    - YES
      - Review the SDS to verify that it is current and the chemical composition is accurate.
      - Complete the chemical review request form and submit to the EHS department. Attach the SDS to the form.
  - YES
    - Review the SDS to verify that it is current and the chemical composition is accurate.
    - Complete the chemical review request form and submit to the EHS department. Attach the SDS to the form.

Consider the following, if not already captured in your MOC:

- Risk assessment, with further analysis as needed (e.g. What-if analysis, HAZOP, etc.)
- SOP creation updates (e.g. SOP outlining proper use of chemical)
- Emergency Response Plan updates
- Any additional communication/training needed
- Review updates to chemical compatibility/interaction matrix
Chemical Review Process

Safety representative

Approved Chemicals Database
- Each site should have a database of approved chemicals
- Each approved chemical should have an accompanying SDS in the database
- The database should be accessible to all employees

Add the SDS to the database of approved chemicals.

Evaluate exposure limits, health effects, and required PPE.

Is personal/area monitoring required in the location where the chemical will be?

What PPE is required for chemical handling (e.g. safety glasses, goggles, face shield, gloves, bodysuits, boots, respiratory protection, etc.)?

Consider method of application (closed-loop or manual addition, e.g. direction injection into process piping, pouring from jug, hand pumping, etc.). Update the PPE matrix as needed.

Post notification of potential/actual exposure for any new/revised chemicals (to satisfy federal and state Right to Know laws). Be sure to include information regarding any major hazards or unexpected/severe health effects.

Consider the potential human health and safety impacts of the requested chemicals. Is anything else required to ensure human health and safety?
Chemical Review Process

**Environmental representative**

**TOXICS & CHEMICALS**
- Check the Consolidated List of Lists. Is the new chemical a hazardous chemical above the TPQ/reporting threshold, or will an additional quantity of an existing onsite chemical cause the TPQ to be exceeded? Submit SDS or updated hazardous chemical list to the SERC, LEPC and local fire department.

**LAND**
- Review Waste characterizations based on changes to the generation process.
- Consider whether the new chemical will make a non-hazardous waste stream hazardous?
- Will this change result in generating a new waste stream? Would this be a listed waste?
- Method of empty container disposal?
- Consider whether the chemical residue or the empty container is a hazardous or universal waste.
- Method of spent chemical disposal (e.g. process drain, hazardous waste bin, etc.)?
- Ensure procedures in place for proper disposal.
- Is the chemical or resulting waste DOT-regulated? If so, be sure all relevant DOT requirements satisfied.

**WATER**
- Will there be any significant changes to effluent characteristics (pH, BOD, etc)?
- Review NPDES/POTW Effluent Permit.
- If facility has on-site wastewater treatment, identify any risks to system before implementing.
- Will there be potential impacts to stormwater?
- Review SWPPP. Add to stormwater inventory and review containment requirements.
- Is new chemical an oil-based product?
- Review SPCC plan and amend if necessary.
- Does the chemical contain a registered EPA Pesticide/Biocide?
- Review NPDES/POTW permitting requirements/notifications.

**AIR**
- Does the chemical contain any hazardous air pollutants (HAPs)?
- Review air permit for requirements/notifications.
- Does the chemical have a high VOC content?
- Review air permit for requirements/notifications.
- Does the chemical contain any ozone depleting compounds?
- Review air permit for requirements/notifications.
- Will the chemical impact air emissions in any way? Consider all equipment air emissions limits. (Catch-all)
- Review air permit for requirements/notifications.

**Determine CFATS applicability. Is the facility quantity at or above the STQ for any COI listed in Appendix A of 6 CFR Pt 27?**
- If so, submit a Top-Screen within 60 days of coming into possession of the COI.

**Will the new chemical be stored in a UST/AST?**
- Review local UST/AST registration and/or notification requirements.

**Consider the potential environmental impacts of the requested chemicals. Is anything else required to ensure the safety of the environment?**
Still have questions?

Encamp’s experts are ready to help you control the lifecycle of your Chemical and Waste environmental compliance data, from collection to reporting, and automating submissions, mailings and fee payments for all 50 states.

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