



U. S. Chemical Safety and Hazard Investigation Board

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March 30, 2004

Mr. John Henshaw
Assistant Secretary of Labor
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Ave., N.W.
Washington, DC 29210

Dear Secretary Henshaw:

On behalf of the U.S. Chemical Safety and Hazard Investigation Board, I write to congratulate you on your initiative in forming the Alliance to Identify and Manage Chemical Reactivity Hazards. We hope this new Alliance will be a major step forward in a common quest to prevent serious accidents caused by uncontrolled chemical reactions.

As you know, one of the most striking findings in the Board's 2002 study, *Improving Reactive Hazard Management*, was that over 90 percent of reactive incidents involve hazards that are already recognized and documented in published literature. This finding speaks strongly to the need for greater outreach and dissemination of information to the management of facilities that process reactive chemicals. I believe there is a particular need to provide information and assessment tools to small and medium-size businesses that, as we find in our investigations, often lack significant technical and safety resources.

The Alliance -- which includes not only OSHA and EPA but also leading universities and chemical industry trade associations -- represents a landmark first step toward getting reactive safety information into the right hands. I am especially pleased that manufacturers are demonstrating their commitment to product stewardship and are planning to provide reactive safety information to the customers and users of their chemical products. With diligent implementation, I believe the Alliance's activities can

help save lives, protect businesses, and spare communities from the devastating impact of reactive chemical accidents.

The Board feels it is important to maintain our independent status, and therefore we will decline from formally joining the Alliance at this time. The Board stands fully behind you in your important endeavor, and we encourage other organizations that share the mission of preventing accidents and protecting workers to consider participating in this joint and cooperative effort. The CSB is ready to offer any assistance and participation where it would be helpful. We will be happy to furnish the Alliance with appropriate resources and information as part of our ongoing outreach and prevention activities. Working in coordination, measurable progress can be achieved on this important issue. Thank you again for your initiative and vision, and I wish you every success in your efforts.

Very truly yours,



Carolyn W. Merritt
Chairman and CEO

Cc: Marianne Horinko, Environmental Protection Agency
Gregory Lebedev, American Chemistry Council
Kathleen Shaver, Chlorine Institute
Joe Acker, Synthetic Organic Chemical Manufacturers Association
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