



Refining & Chemicals

May 31, 2022

Public Summary of Cray Valley Product Risk Ranking Procedure

Purpose

The purpose of this of this document is to provide the public with a summary of the procedure used by Cray Valley (Cray Valley), a division of TotalEnergies Petrochemicals & Refining USA, Inc. (TEPRI), to risk rank the products manufactured and/or marketed by Cray Valley. The risk ranking is used to help in prioritization of product stewardship efforts and resources for risk management of TEPRI products.

Scope and Applicability

This document applies to Dymalink®, Cleartack®, Krasol®, Poly bd®, Ricobond®, Ricon®, Wingtack® and other commercial and commercial development products of the Cray Valley division.

This process is used to define a screening process to prioritize the risk of TEPRI products using both hazard and exposure information. This process is sufficiently detailed to provide risk characterization information using the hazards, intended uses, and potential exposure of the product.

Risk ranking of existing products with commercial sales is performed periodically using data from the previous 12 months sales volume, and the results shall be made accessible internally. Risk ranking of new developmental products is performed on an as-needed basis.

Procedure

1. Product Risk Ranking Process

The product risk ranking process places the product risk into one of three categories (high, medium, low) based on matrix evaluation system. One axis of the matrix evaluates potential exposure, and the other axis of the matrix evaluates hazards associated with the product.



		Product Risk		
		Low	Medium	High
Exposure	High	Medium	High	High
	Medium	Low	Medium	High
	Low	Low	Low	Medium
		Low	Medium	High

2. Hazard Ranking

The product hazards are evaluated using a system that creates a numeric value based on the US OSHA GHS hazard classification of the product. In addition to the hazards evaluated based on the OSHA GHS classification, the following hazards are evaluated and assigned a numeric value:

- The possibility of a combustible dust hazard
- The possibility of an auto-polymerization hazard (which is not US GHS classified as a self-reactive material)
- The possibility of the release which would damage the environment (i.e., an environmental hazard)

The product's overall numeric hazard rank is the sum of the individual hazard numeric values based on the criteria listed above, which determines whether the product is ranked either high, medium, or low in terms of hazard.

3. Exposure Ranking

The Exposure Ranking for the product is evaluated using a system that creates a numeric value which includes the following categories:

- Annual Sales Volume
- End use exposure evaluating the possibility and type of public exposure in its intended uses
- Product physical availability (whether the product might be a respirable solid, a high volatility liquid, water soluble, absorbable through the skin)

The product's overall numeric exposure rank is the sum of the individual risk numeric values based on the criteria listed above, which determines whether the product is ranked either high, medium, or low in terms of exposure.



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