



Total Petrochemicals & Refining USA, Inc.

Total Cray Valley

Public Summary of TCV Product Risk Ranking Procedure

1. Purpose

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

2. Scope / Applicability

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

This process is used to define a screening process to prioritize the risk of TPRI 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 annually on 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.

3. Procedure

3.1. Product Risk Ranking Process

3.1.1. The Product Risk Ranking process places the product risk into one of 3 categories (high, medium, low) based on matrix evaluation system. One side of the matrix evaluates potential exposure and the other side 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
		Hazard		



Total Petrochemicals & Refining USA, Inc.

Total Cray Valley

3.1.2. Hazard Ranking

The product hazards are evaluated using a system that creates a numeric value based 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.

3.1.3. 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 of no anticipated public exposure, limited public exposure, and general public exposure, including exposure of children

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 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.

March 22, 2018