

TECHNICAL DEPARTMENT COMMUNICATION

Bulletin No.: OSHA-001 (Document Circulation: General; Distributor; Internal & confidential)

PRODUCT: All *INERTEX*® 100% Expanded PTFE Products

SUBJECT: Process Safety Management (OSHA 1910.119)

As required by the Clean Air Act Amendments, an OSHA standard was developed for the process safety management (PSM) of highly hazardous chemicals (29 CFR, Ch. XVII, Sec. 1910.119). The purpose of this standard is to prevent or minimize the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. This standard applies to a process which involves a chemical at or above the specified threshold quantities listed in Appendix A of the subject standard (currently 137 chemicals). This standard generally also applies to a process that involves a flammable liquid or gas in a quantity of 10,000 lbs or more.

This standard contains 16 sections and 4 appendices outlining a company's legal responsibilities to assure process safety. The Management of Change (Section L) states that except for replacement-in-kind a company shall establish and implement written procedures to manage changes to process chemicals, technology, equipment, and procedures. The replacement-in-kind is defined as a replacement which satisfies the design specifications.

Within their operating parameters, *INERTEX*® products are considered superior to any known gasketing material for tightness, which is favorable to the Clean Air Act requirements. Replacement of current gaskets by the *INERTEX*® products can normally be considered a replacement-in-kind and does not require the expensive management of change process. Additionally, replacement of current gaskets with *INERTEX*® products generally:

- A) is supported by a strong technical basis,
- B) will not have an adverse change on safety and health,
- C) will not require modifications to operating procedures, and
- D) will not affect job tasks associated with maintenance or operation of system.

To facilitate the replacement-in-kind conversion from the current gaskets to the *INERTEX*® products, the following information will be made available to the process safety manager upon request:

1. Safety Data Sheet
2. Material specifications including composition, operating parameters and technical information
3. Independent test results by the Tightness Testing Research Laboratory, Ecole Polytechnique
4. ISO 9001 AS9100 Certification

Inertech Inc. will be glad to provide further relevant information upon your request.

All information and recommendations contained in this publication are, to our best knowledge, correct. Since conditions of use are beyond our control, users should base their decision upon information verified through their own field testing as to whether products are suitable for the intended processes and uses. No warranty is given or implied with respect to information or recommendations herein. In any event or occurrence our liability is limited to our invoice value of the goods delivered to you by Inertech. Inertech reserves the right to change product design and properties without notice.

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PREPARED BY: Inertech, Inc.

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