

# **OxyChem**

A Subsidiary of Occidental Petroleum Corporation

## **APPROVED USES FOR SODIUM CHLORITE**

Below is a list of the markets in which OxyChem sells sodium chlorite. The list is not meant to be all inclusive and there are numerous applications within some of these markets. The applications are for both dry and liquid products. However, the dry product must be converted to aqueous solutions before use and cannot be reduced in particle size by mechanical means.

### **Approved Uses**

Air Scrubbing  
Bleach manufacturing  
Chemical manufacturing and processing  
Chemical neutralization/oxidation  
Chemical etching  
Food and beverage  
Sanitation  
Oil and gas production and refining  
Water treatment-municipal, waste, and industrial  
Bleaching

OxyChem does not knowingly or willingly sell sodium chlorite for PERSONAL CARE or ANIMAL CARE applications unless the use has been approved by a competent federal authority such as Environmental Protection Agency (EPA), Food & Drug Administration (FDA), US Department of Agriculture (USDA), etc.

OxyChem does not knowingly or willingly sell sodium chlorite products into applications that are for human or animal consumption.

OxyChem also does not knowingly or willingly sell sodium chlorite to individuals for their own personal uses such as personal water treatment and other household uses.

OxyChem's primary objective is to assure that sodium chlorite products are distributed to reputable entities that are knowledgeable of the hazards and reactive properties of the chemical so that they are able to handle it safely. OxyChem is committed to keeping sodium chlorite out of the hands of individuals for such unapproved uses as ridding the body of toxins, or purchasing sodium chlorite to take internally, or to repackage and sell to others for such purposes.

Any deviation from the above uses must be reviewed and approved by OxyChem before purchase of product is allowed.

Important: The information presented herein, while not guaranteed, was prepared by technical personnel and is true and accurate to the best of our knowledge. NO WARRANTY OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, OR WARRANTY OR GUARANTY OF ANY OTHER KIND, EXPRESS OR IMPLIED, IS MADE REGARDING PERFORMANCE, SAFETY, SUITABILITY, STABILITY OR OTHERWISE. This information is not intended to be all-inclusive as to the manner and conditions of use, handling, storage, disposal and other factors that may involve other or additional legal, environmental, safety or performance considerations, and OxyChem assumes no liability whatsoever for the use of or reliance upon this information. While our technical personnel will be happy to respond to questions, safe handling and use of the product remains the responsibility of the customer. No suggestions for use are intended as, and nothing herein shall be construed as, a recommendation to infringe any existing patents or to violate any Federal, State, local or foreign laws.

01/2011



**Occidental Chemical Corporation**  
6200 S. Ridge Road, Wichita, KS 67215  
P.O. Box 12283, Wichita, KS 67277  
800-733-1165 Ext. 1

February 14, 2008

**UNIVAR USA INCORPORATED**

***Re: Sodium Chlorite and Human Health Applications***

Dear Valued Customer:

You are a valued customer for OxyChem's Sodium Chlorite products, and as such, we want to make you aware of a potential misuse of Sodium Chlorite in the marketplace. We have recently ascertained that some companies or persons are marketing products containing Sodium Chlorite for human "health" and ingestion applications. However, as clearly explained in the Material Safety Data Sheet (MSDS) for OxyChem's product, Sodium Chlorite may be harmful if swallowed and may cause death if used in applications not specifically listed on the product label (e.g., potable water treatment use, which is authorized by the EPA).

We ask that you promptly advise your sales representatives and customers that it is a violation of federal law, and could pose a serious health risk, for anyone to use OxyChem's Sodium Chlorite product in any manner inconsistent with the authorized uses listed on the product label. You should not allow any sales or resales of OxyChem's Sodium Chlorite product to persons whom you believe may be involved in unauthorized applications of this product.

As a Responsible Care® Company, OxyChem takes health and product stewardship issues very seriously, and we appreciate your assistance in helping ensure the continued safe use of OxyChem's Sodium Chlorite products. Please do not hesitate to contact your sales representative or this office should you have any questions regarding this matter.

Sincerely yours,

**OCCIDENTAL CHEMICAL CORPORATION**



Robert L. Bower

Director, Distributor Relations

RLB/kjf

cc: Sales Office



**Occidental Chemical Corporation**

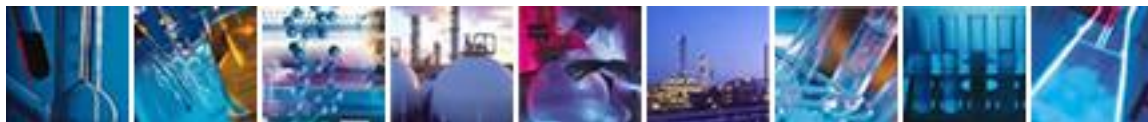
A subsidiary of Occidental Petroleum Corporation

Corporate Office, Occidental Tower

5005 LBJ Freeway, Dallas, TX 75244-6119

P.O. Box 809050, Dallas, TX 75380-9050

972/404-3800 Fax: 972/404-3738



# **OxyChem** A Subsidiary of Occidental Petroleum Corporation

---

July 12, 2010

Attn: Ed Higbee  
Univar USA.  
17425 NE Union Hill Road  
Redmond, WA

Dear Mr. Higbee:

We sincerely appreciate your recent participation in our Product Stewardship Program Survey for sodium chlorite products. OxyChem Technical Services initiated an assessment program in 2008 requiring new customers to complete an assessment form which evaluated their procedures for the storage and handling of OxyChem products that contain sodium chlorite.

This did not include customers that were receiving product before we initiated the program. Therefore, we have decided to evaluate our existing customer base prior to 2008 by having them complete this assessment as well. Enclosed with this letter is a **Customer Self Assessment Questionnaire** that should be forwarded to, and completed by personnel responsible for the handling of sodium chlorite at your facilities listed below. Due to the unique properties of sodium chlorite, and the special handling required to protect personnel working with and around sodium chlorite, OxyChem requires that this assessment be completed and returned to us within 60 days from the date of this letter. Upon receiving the completed questionnaire, the assessment will be reviewed by OxyChem Technical Service Department and if necessary, will contact you for follow up questions and a discussion regarding your facility's handling practices and use of sodium chlorite.

They may email the completed form directly to me at [norman\\_dodson@oxy.com](mailto:norman_dodson@oxy.com), or fax it to 713-985-1507. If you wish, OxyChem Technical Service will work directly with the facility to complete the form, but I recall that you stated that you would prefer to coordinate these yourself. The following facilities are requested to complete the assessment form:

**ALL COMPLETED FORMS ARE TO BE E-MAILED DIRECTLY TO ED HIGBEE DO NOT SEND DIRECTLY TO OXY**

Univar USA; Johnstown, NY  
Univar USA; Norcross, GA  
Univar USA; Spartanburg, SC  
Univar USA; Bedford Park, IL  
Univar USA; Charlotte, NC  
Univar USA; Romulus, MI  
Univar USA; Wichita, KS

OxyChem values your business and appreciates your cooperation and prompt response to this request. **Failure to return the completed self assessment within the 60 day period may result in the suspension of shipments for failure to comply with OxyChem's Product Stewardship Program.** If you have questions or concerns, feel free to contact me.

---



**Occidental Chemical Corporation**

6200 South Ridge Road; Wichita, KS 67215  
P.O. Box 12283; Wichita, KS 67277  
800-733-1165

Sincerely,

A handwritten signature in dark ink, reading "Norman Dodson". The signature is written in a cursive style with a large, stylized "N" and "D".

Norman Dodson  
Technical Service Specialist



**OxyChem**

A Subsidiary of Occidental Petroleum Corp.



6200 South Ridge Road  
Wichita, KS 67277  
800-733-1165 Ext. 1

## **Sodium Chlorite Customer Self Assessment Checklist**

Facility name: \_\_\_\_\_  
Location: \_\_\_\_\_  
Contact Name: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Email: \_\_\_\_\_  
Website: \_\_\_\_\_  
Date of Assessment: \_\_\_\_\_

**Purchased from:**

Distributor name: \_\_\_\_\_  
Distributor contact: \_\_\_\_\_  
Distributor contact phone: \_\_\_\_\_

-----  
**Scope**

As an element of OxyChem's social responsibility and commitment to Responsible Care<sup>®</sup>, this assessment has been developed to assist in the evaluation of OxyChem customers' abilities to safely receive, handle, store and use sodium chlorite. Due to the unique properties of sodium chlorite, and the special handling required to protect personnel working with and around sodium chlorite, and to minimize the possibility of personal exposure and environmental impact, OxyChem requires that this assessment be completed by an authorized company representative.

Please return the completed form to OxyChem's Technical Service Department. After reviewing the completed assessment, an OxyChem Technical Service representative will contact the person listed above to further discuss the assessment.

**Name of Authorized Facility Representative Completing this Form:** \_\_\_\_\_

Date: \_\_\_\_\_

## Sodium Chlorite Customer Self Assessment Checklist

### **Section A: General Information—Please fill out all of section A and follow instructions for sections B, C and D.**

1. How long has this company been in business? \_\_\_\_\_
2. What is the nature of this business? \_\_\_\_\_
3. In what type of area is this facility located?
  - a. Industrial ☐
  - b. Commercial ☐
  - c. Residential ☐
  - d. Institutional ☐
  - e. Other (specify) ☐ \_\_\_\_\_
4. How long has the facility been handling sodium chlorite? \_\_\_\_\_
5. Do you purchase:  
    \_\_\_\_\_ Bulk  
    \_\_\_\_\_ Drums  
    \_\_\_\_\_ Totes  
    \_\_\_\_\_ Pails
6. What is the concentration of the sodium chlorite product that you purchase?  
    \_\_\_\_\_ Dry flakes  
    \_\_\_\_\_ 37% Solution  
    \_\_\_\_\_ 25% Solution  
    \_\_\_\_\_ 18% Solution  
    \_\_\_\_\_ Other \_\_\_\_\_
7. Does the facility have on-site emergency response capability of responding to sodium chlorite spills or releases? Yes ☐ No ☐
  - a. If no, are local emergency responders trained and able to respond in a timely manner on a 24-hour basis? Yes ☐ No ☐
8. Provide emergency response contact name and number. \_\_\_\_\_
9. Do you have a Material Safety Data Sheet on file for sodium chlorite? Yes ☐ No ☐

## Sodium Chlorite Customer Self Assessment Checklist

10. Do personnel that handle sodium chlorite receive product specific training? Yes ☐ No ☐
- a. If yes, describe training. \_\_\_\_\_
- b. Trainer/Title \_\_\_\_\_
11. Describe clean-up and disposal procedures for responding to small spills of sodium chlorite.  
\_\_\_\_\_
12. If material is to be used on-site, what is the end application for the sodium chlorite? \_\_\_\_\_
- a. Will the product be used as a pesticide in this application? Yes ☐ No ☐
13. What materials of construction are in use for the piping system and other sodium chlorite handling equipment?
- ☐ Schedule 80 PVC
- ☐ CPVC
- ☐ Vinyl Ester FRP
- ☐ Teflon lined pipe
- ☐ Other, please describe \_\_\_\_\_
14. Is your facility a member of (check all that apply):
- i. American Chemistry Council (ACC), ☐
- ii. National Association of Chemical Distributors (NACD), ☐
- iii. Canadian Chemical Producer's Association (CCPA), ☐
- iv. Canadian Association of Chemical Distributors (CACD)
- v. Other trade groups that are signatories of Responsible Care? ☐
- Please list: \_\_\_\_\_
15. Have your employees seen the OxyChem Safety & Handling DVD for Sodium Chlorite? Yes ☐ No ☐

## Sodium Chlorite Customer Self Assessment Checklist

**If receiving packaged products, please continue with Section B.**

**If receiving bulk products, please skip to Section C.**

**Section B: Packaged Products:** If facility receives drums, totes or pails of sodium chlorite, please complete the following section:

16. Describe storage facility

- a. Type of storage area (warehouse, storeroom, dimensions, materials of construction, etc.) \_\_\_\_\_
- b. \_\_\_\_\_ Outdoors?
  - i. Is the storage area covered so that product containers are out of direct sunlight? Yes ☐ No ☐
- c. \_\_\_\_\_ Indoors?
  - i. Is the facility climate controlled? Yes ☐ No ☐
  - ii. Is storage area well ventilated? Yes ☐ No ☐

17. Are other chemicals being stored within same area of the warehouse? Yes ☐ No ☐

- a. If yes what are the other chemicals? \_\_\_\_\_
- b. Is there a segregation buffer zone between the sodium chlorite packages and other chemicals? Yes ☐ No ☐
  - i. If yes, describe. \_\_\_\_\_

18. What Personal Protective Equipment (PPE) is worn by facility personnel while handling the product?

- ☐ Chemical goggles
- ☐ Gloves (nitrile or neoprene/chemical resistant)
- ☐ Chemical repellant suit (PVC, Kappler DPF2 or CPF3)
- ☐ Chemical repellant long coat (PVC, Kappler DPF2 or CPF3)
- ☐ Chemical repellant boots (PVC or natural rubber)
- ☐ Respirator (with N-95 cartridge)
- ☐ Other (describe) \_\_\_\_\_

19. Is there dedicated equipment for transfer, handling, and use of sodium chlorite?

Yes ☐ No ☐

20. Describe procedure for the disposal of empty containers. \_\_\_\_\_

21. Is the product delivered to this facility being repackaged for redistribution? Yes ☐ No ☐

If yes, and the product is **not** bulk delivery, please complete Section D.



## Sodium Chlorite Customer Self Assessment Checklist

**Section C--Bulk Deliveries:** If facility receives bulk shipments of sodium chlorite solution(s), please complete the following section:

22. What materials of construction are in use for the bulk storage tank?

- ☐ Fiberglass Reinforced Plastic (FRP)
- ☐ High Density Polyethylene (HDPE)
- ☐ Titanium
- ☐ Other, please describe \_\_\_\_\_

23. What is the total storage tank capacity? \_\_\_\_\_

(Recommendations are for tank capacity to be at least 1.5 times delivery quantities. Full tank trailer deliveries are approximately 5000 gallons.)

24. Is storage tank equipped with instrumentation to accurately measure inventory?

Yes ☐ No ☐

a. If yes, please describe \_\_\_\_\_

b. If no, what procedures are in place to assure that there is sufficient tank outage to accept the full delivered quantity? \_\_\_\_\_

**NOTE:** If storage tank capacity is less than 1.5 times the delivered quantity, company personnel will be required to monitor the tank during the entire offloading of product into tanks that do not have a level indicator. Instructions of this nature will be placed on the Bill of Lading.\*

25. Is there secondary containment for the storage tank?

Yes ☐ No ☐

If yes, describe the secondary containment. \_\_\_\_\_

Is the secondary containment capable of holding 110% of the tank capacity?

Yes ☐ No ☐

26. How is the sodium chlorite unloaded?

- ☐ Carrier-supplied air
- ☐ Facility pump
- ☐ Facility-supplied air

**NOTE:** Sodium chlorite tank trailers have a pressure-relief device that relieves at approximately 35 psig. If facility-supplied air is to be utilized for unloading, has it been verified that the air pressure is regulated to 30 psig maximum? Yes ☐ No ☐

27. Is the storage tank properly vented so the pressure rating of the tank is not exceeded during delivery and especially at the end of unloading? Yes ☐ No ☐

**NOTE:** At the end of air unloading, an air surge of approximately 1350 standard cubic feet per minute (SCFM) will impact the tank. The tank's venting system must be properly designed to accommodate the air surge without exceeding the storage tank's pressure rating.

## Sodium Chlorite Customer Self Assessment Checklist

28. Does the facility have a well-marked, well-maintained eyewash and safety shower in the immediate unloading area? Yes ☐ No ☐
29. Is the facility offloading line properly labeled with the identity of the material being offloaded? (sodium chlorite, chlorite solutions, UN 1908, etc.) Yes ☐ No ☐
30. The mixing of sodium chlorite with incompatible materials can cause adverse reactions leading to catastrophic failure of unloading and storage equipment.  
Does your receiving shipment procedures include: (check all that apply)
- ☐ Personnel to escort driver to unloading area
  - ☐ Personnel to "sign-off" on delivery checklist
  - ☐ Visual inspection of offloading line
  - ☐ Line label that is weather resistant
  - ☐ Map to unloading area
  - ☐ Communication to driver about overflow alarms or warning lights
  - ☐ Other, please describe \_\_\_\_\_
31. Is the unloading system designed to allow draining of all material from transfer hoses prior to disconnection of hoses? Yes ☐ No ☐
- a. If no, what method is being used to prevent release of product during hose disconnection, which may result in an environmental impact? \_\_\_\_\_
32. Are the facility unloading line and connections well supported to minimize stress on the lines and connections during product unloading? Yes ☐ No ☐
33. Are deliveries made after dark? Yes ☐ No ☐
- a. If yes, is the unloading area adequately lighted? Yes ☐ No ☐
34. Is product unloaded by OxyChem delivery person or does customer facilitate unloading of the tank trailer? OxyChem ☐ Customer ☐
- a. If the customer facilitates the unloading, have all unloading personnel received DOT general awareness/familiarization training and function-specific training at a minimum 3 year interval (Reference: 49 CFR Subpart H; 172.700-172.704)? Yes ☐ No ☐
35. If customer is to facilitate unloading, what personal protective equipment (PPE) is worn by facility personnel during hookup and unloading.
- ☐ Chemical goggles
  - ☐ Gloves (nitrile or neoprene/chemical resistant)
  - ☐ Chemical repellant suit (PVC, Kappler DPF2 or CPF3)
  - ☐ Chemical repellant long coat (PVC, Kappler DPF2 or CPF3)
  - ☐ Chemical repellant boots (PVC or natural rubber)
  - ☐ Other (describe) \_\_\_\_\_

## Sodium Chlorite Customer Self Assessment Checklist

36. Is the product being repackaged at this facility for redistribution? Yes ☐ No ☐  
If yes, please complete Section D.

### **Section D: Redistributed Product**

37. Are packaged products redistributed in the same containers as received? Yes ☐ No ☐  
a. If No, describe the on-site repackaging operations for the sodium chlorite. \_\_\_\_\_

38. If product is redistributed, does your Product Stewardship Program adequately assess your customer's ability to safely store and handle sodium chlorite?

Yes ☒ No ☐

Briefly describe your Product Stewardship Program Univar USA's computer order management system allows individual products to be managed for Product Stewardship purposes. This is accomplished by identifying the product in a system master file which is centrally controlled with limited access. Once identified, an order for the product involved will not process in the system for sale/delivery without review/release by the Regional Regulatory Manager (RRM) in the applicable region. This release process involves the RRM approving the product for the customer and providing an expiration date at which time the requirements for approval must again be met before an order will process (in this case we have set a 3 years expiration). The process for customer approval first requires the customer to submit to the RRM a usage application form in which the customer describes their intended use/application for the product. The RRM will then review/compare the intended customer use/application to the approved list of uses/applications provided by Oxy. If the customer uses/applications are approved by Oxy, Univar USA then requires the customer to sign an acknowledge they will train their personnel with the provided MSDS and Oxy materials which include: Oxy sodium chlorite health & safety technical data sheet, Oxy product stewardship summary for sodium chlorite, Oxy sodium chlorite solution bulk product storage technical data sheet and the Oxy sodium chlorite safe handling DVD. Once a signed acknowledgement is received by the RRM, the customer will be approved to purchase the product with a 3 year expiration. In three years the process will be repeated before a sale will be allowed. Customer will also be provided with updated Oxy information as received from Oxy.

39. If material is redistributed, is the OxyChem MSDS utilized or does your facility distribute its own MSDS? OxyChem MSDS ☐ Own MSDS ☒

**Please return completed form to:**

OxyChem Technical Service  
P.O. Box 12283  
Wichita, KS 67277-2283

## **Sodium Chlorite Customer Self Assessment Checklist**

Phone: 800-733-1165 Ext. 1

Fax: 316-529-7555