TotalEnergies

TotalEnergies Petrochemicals & Refining USA, Inc.

Public Summary of Product Risk Ranking Procedure

Purpose

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

Scope / Applicability

This document applies to the products in our Base Chemicals, Polymers, Special Fluids, and Cray Valley business lines.

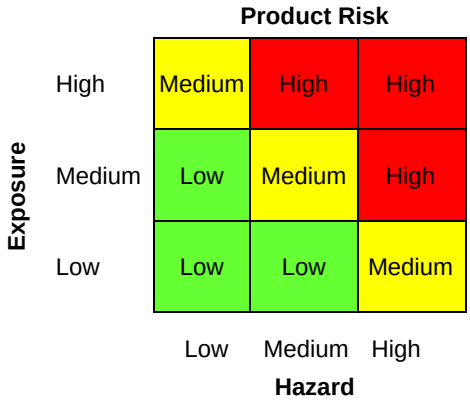
This risk ranking process is used to characterize the risk of TEPRI products using hazard and exposure information. This process is sufficiently detailed to provide risk characterization information using the hazards, intended uses, and potential exposure of the product.

Risk ranking of existing products with commercial sales may be updated annually or less frequently. The process evaluates the previous 12 months sales volume or annual product volume, and the results are 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. The vertical axis of the matrix measures potential exposure, and the horizontal axis measures hazards associated with the product.



2. Hazard Ranking

The **Hazard Ranking** for the product is evaluated using a system that gives a numeric value for each hazard present in the following categories:

- US OSHA GHS hazard classification of the product (This is the largest component of the hazard ranking.)
- The possibility of a combustible dust hazard
- The possibility of an auto-polymerization hazard (that doesn't meet the OSHA definition of a self-reactive material)
- Environmental hazards identified in US DOT regulations

The product's overall numeric **Hazard Rank** is the sum of the individual hazard numeric values based on the criteria listed above, and it determines whether the product is ranked either high, medium, or low hazard.

3. Exposure Ranking

The **Exposure Ranking** for the product is evaluated using a system that gives a numeric value for criteria in the following categories:

- Annual sales volume or annual production volume
- User sophistication for handling hazardous materials safely
- End use exposure (for example, whether the material is used in consumer products)
- Product physical availability (how easily the material can spread in the environment or enter the body)

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 exposure potential.

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