

VISTA CHEMICAL COMPANY
PROCESS SAFETY MANAGEMENT GUIDELINE

PART "F"
SAFE WORK PRACTICES

**Vista Chemical Company
Process Safety Management Guideline**

Part "F"
Safe Work Practices

Issue Date:
1/15/92

1.0 SCOPE

This guideline defines the requirements for developing "Safe Work Practice" procedures. This guideline applies to all Vista Chemical Company manufacturing plants - Aberdeen, Baltimore, Hammond, LCCP, LCLAB, LCVCN, and Oklahoma City. Implementation of Safe Work Practices per this guideline will fulfill the requirements to be specified in the proposed OSHA regulation 29 CFR 1910.119 paragraph (k) (Attachment "A") and the recommended practices specified by CMA's "Process Safety Code of Management Practices", Management Practice # 18 (Attachment "B").

The proposed issue of the OSHA regulation only includes "Hot Work Permits". The final issue of the regulation is expected to contain elements that include confined space entry, lock and tagout, and safe work permit procedure requirements.

2.0 PURPOSE

The purpose of this guideline is to serve as a basis from which each location must develop written procedures for each of the safe work elements.

3.0 DEFINITIONS

4.0 VISTA GUIDELINES

4.1 WHAT IS REQUIRED

4.1.1 Application

Safe Work Practice Procedures must be followed by all personnel who perform work in a process unit or related facilities. This includes contract as well as direct employees.

4.1.2 Basic Elements

The basic elements that these procedures must contain are described as follows:

- a. Purpose.
- b. Scope definition.
- c. Description of practice or procedure.
- d. Assignment of responsibilities.
- e. Reporting (if required).

4.1.3 Specific Procedures

Safe Work Practice Procedures must be developed for hot work, confined space entry, energy isolation(lock and tagout), and safe work permits. In addition to the required ones, it is recommended that underground

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excavation permit procedures be developed to prevent damage of underground piping that has hazardous chemicals. The details of the specific procedure for "Hot Work" are contained in the regulatory wording and must be included in the plant procedures.

Also reference OSHA regulations for "Fire prevention", 29 CFR 1910.252(a) and for Energy Isolation(lockout/tagout) 29 CFR 1910.147 and the proposed confined space entry regulation. The proposed regulation "Permit Required Confined Spaces", 29 CFR 1910.146, is recorded in the Federal Register, page 24080 on June ,5 1989.

It is expected that the final issue of the process safety regulation will contain additional procedure details. These will have to be included in the plant procedures.

4.1.4 Documentation

Documentation of the procedures should be maintained in the plant's Safety and Health Manual. Changes, when required, must follow the Management of Change procedure for the location.

4.2 RESPONSIBILITIES

Generally the Safety Department at each location would be responsible for maintenance of these procedures. Each plant location will have to assign responsibility as they require.

4.3 TIMING

4.3.1 Regulatory Timing

It is expected that the regulation will require these procedures to be in place by November 1992.

4.3.2 Vista Timing

Procedures developed and functioning by November 1992.

Appendix A

(k) HOT WORK PERMIT

- (1) The employer shall issue a permit for all hot work, with the following exceptions:
 - (i) Where the employer or employer's representative, designated as responsible for authorizing Hot Work operations is present while the hot work is being performed; and,
 - (ii) In welding shops authorized by the employer.
- (2) The permit shall certify that the fire prevention and protection requirements contained in 29CFR 1910.252(a) have been implemented prior to beginning hot work operations; indicate the date(s) authorized for hot work, and identify the equipment or facility on which hot work is to be done. The permit shall be kept on file until completion of the hot work operations.

MANAGEMENT PRACTICE 18: SAFE WORK PRACTICES**Establishment of procedures and work practices for safe operating and maintenance activities**

Concise, well-written, safe work practices and procedures equip knowledgeable personnel to perform operating and maintenance tasks in a safe manner. These practices and procedures bridge the gap between training and experience and offer employees critical guidance on how to protect themselves, other employees and the public from human error-induced accidents. The results from this management practice are used to help develop and refine initial training programs (MP19) and recurrent demonstration of competency (MP20).

PROCESS SAFETY ACTIVITIES**18.1 Using the results from job and task analyses (MP17), develop safe work practices for discrete tasks performed by operating and maintenance personnel.**

- ▶ Develop and implement proper methods for taking laboratory analysis samples.
- ▶ Define the use of specialized tools and equipment.
- ▶ Define the use of personal protective equipment.
- ▶ Develop recognition of hazards and appropriate emergency actions through the use of techniques such as Job Safety Analysis.
- ▶ Describe the use of lockout/tagout procedures, hot work permits, heavy lifting permits, confined space entry procedures and special activity (e.g., line break) permits.

18.2 Develop clear, written procedures for normal operating and maintenance activities.

- ▶ Develop clear instructions and checklists for start-up, normal operation, standby, recirculation and normal shutdown actions. Include figures and illustrations for complicated tasks or refer to standard operating procedures for more information.
- ▶ Develop practical checklists for performing routine preventive maintenance on critical process equipment items.
- ▶ Develop procedures explicitly dealing with process upsets and emergencies (e.g., loss of containment events).

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ATTACHMENTS

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18.3 Create a mechanism for employees to give feedback on problems encountered in the use of established work practices and procedures.

- ▶ Conduct regular shift meetings to discuss problems.
- ▶ Conduct preventive maintenance and turnaround debriefings to share experiences and lessons learned.
- ▶ Appoint employee safety committees that review employee suggestions and make recommendations to company management.
- ▶ Maintain copies of current safe work practices and procedures in unit and shop locations. Consider using a computerized data base.
- ▶ Conduct periodic reviews of all work practices and procedures.