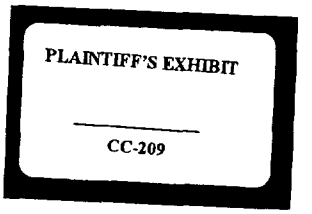
INTER-CORPORATE CORRESPONDENCE



January 29, 1992

TO: Distribution

FROM: Carlos Stennett

SUBJECT: Safety Work List for each Division

Attached you will find a portion of the Safety work items that applies to your area of responsibility. Individuals responsible for the completion of these items have been identified along with the due date of the item. These due dates are mandatory, subject to change only with prior approval from Ralph Coker. In the event you need to change accountable designee, please advise me in writing.

There will be monthly submissions of status on each item. These shall be short, specific sentences that show progress. They are to be submitted to Linda O'Brien for compilation before the end of the month.

If you have any questions concerning this matter, please do not hesitate to contact me.

Carlos Stennett

CARLOS STENNETT
Manager
Environmental, Health & Safety

CS/lob

Distribution:

Ralph Coker
Billy Dickman
Greg Walther
John Parker
Larry Huwe
Eppy Gonzalez
Arlen Tidemann

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	OIL MOVEMENT & STORAGE AREAS	Danny Garcia		
	Barge loading hoses are tested annually with records being maintained. This testing should be extended to cover all hoses used in the plant for tank trucks and rail tank car. Frequency and type of test should be appropriate for whatever service the hose is to be used for. (Product transfers, tank truck loading / unloading, rail car loading / unloading, stream, water, air, nitrogen, etc.)	Danny Garcia	6/1/92	
	Provide railroad derails at tank car loading/unloading racks and ; lug flags.	Danny Garcia	3/1/92	
	National Fire Protection Association (NFPA) hazard identification signs should be posted on all tanks. These signs should be of sufficient size to permit observation by any response team coming into the plant during an emergency.	Danny Garcia / Val DeLeon	8/1/92	
	Develop a procedure to insure that disconnected valves near bottom of tanks are fitted with blind flanges (or other plugs) to prevent inadvertent opening and spillage.	Danny Garcia	9/1/92	
	Repair dangling insulation metal covers on asphalt tanks numbers 52, 53, 55, and 71 to prevent personal injury.	Danny Garcia - Determine if TK insulation is required Issuing of AFE's	3/1/92	
	Institute routine checking of hydrocarbon purge in east plant flare to insure that a safe level is always maintained. Clean the existing sight glass to allow determination of level.	Garcia/Walther Will maintain a positive hydrocarbon purge in the flare.		
	Housekeeping of area is unsatisfactory and needs considerable attention.	Garcia	9/1/92	

RAM 0001896

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Pools of liquid hydrocarbons of unknown origin within tank dikes of tanks 113 and 114.	Garcia	5/1/92	
	OIL MOVEMENTS AND STORAGE AREAS (ADDITIONAL ITEMS)			
	Asphalt tank leaking near base of tank. (Refer to previous comment concerning developing a plan for inspecting the structural integrity of storage tanks).	Garcia	6/1/92	
	Many 55-gallon drums, both empty and full, of unknown materials located within storage tank dikes.	Garcia	6/1/92	
	Routine operation of motor vehicles within dikes of storage tanks containing flammable materials provide an ignition source in the event of a spill.	Garcia	6/1/92	
	The railroad tracks passing through the east plant permits easy accessibility onto plant property by unauthorized personnel. The potential for personnel mishap or damage to plant equipment is feasible without proper security.	Garcia	6/1/92	

RAM 0001897

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	GENERAL	Walther		
	Institute routine checking of hydrocarbon purge in east plant flare to insure that a safe level is always maintained. Clean the existing sight glass to allow determination of level.	Garcia/Walther Will maintain a positive hydrocarbon purge in the flare.		
	GENERAL COMMENTS - WEST PLANT			
	Nitrogen and instrument air lines found cross connected at several locations in the West Plant. The bleed valve between the instrument air line and the nitrogen line was found closed at two locations. The Plant must develop some system for preventing these two materials from cross-contaminating and possibly presenting a personnel asphyxiation hazard.	Walther Investigate	3/1/92	
	The entire Coastal operating areas have a very bad habit of using fire water for everything! If fire water is ever needed for a fire, it might not be available since it is being used for everything else.	Greg Walther	4/1/92	

RAM 0001898

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	INSTRUMENTS SHOP. Two (2) Fire Extinguishers in the instrument shop - no annual inspection tag.	None		
	"No Smoking" sign - no reason for it.	None		
	Weld torch not in use bottles outside are turned on. C2H2 gauge lens is cracked.	None		
	No tongue guard and work rest not adjusted on bench grinder outside back door of instrument shop.	None		
	Plant air drop by east side of instrument shop not labeled.	None		
	Temporary flex extension cord goes from near air comp. to the temporary building south of knock engine lab through holes in the wall and across driveway.	None		
	Multiple receptacle box mold at end of extension cord, not intended for its use.	None		
	Flex cords through hole in the wall to grinder.	None		
	Blower electrical box - no cover.	None		
	West side of shop. Receptacles of test bench not grounded.	None		
	MSDS's not appropriate for area.	None		
	Housekeeping in and outside is bad.	None		
	Circuit breaker near rear door not ID'ed.	None		
	ELECTRICAL SHOP			
	Fire extinguisher not prominently located under wash basin near west bay door, no inspection tag. Fire ext. in corner behind trash is unsealed.	None		

RAM 0001899

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Iron worker guards removed from the various locations.	None		
	Pendant control on 2 ton hoist not labeled correctly, hoist load hook latch is worn. No inspections.	None		
	Need housekeeping	None		
	Broken step ladder - west storage area not tagged or thrown away.	None		
	Bench grinder tongue guard not adjusted.	None		
	Drill press needs to be bolted to floor - too much clutter around it.	None		
	Unguarded fan and pulley in storage loft.	None		
	Need better warning of low ceiling in loft.	None		
	Five unguarded light bulbs in ceiling of loft.	None		
	PIPE SHOP Ground lead on Miller welder badly damaged, near south door.	None		
	Hot lead also needs repair.	None		
	Remove polarity on receptacle next to weld machine - south wall.	None		
	Both bench grinders need adjustment of tongue guard and work rests.	None		
	Rear pulley of drill press needs guarding.	None		
	Open switch box near south west door and at east wall.	None		
	Ground lead on east wall Miller needs repair, hot lead near plug to machine needs repair.	None		

RAM 0001900

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	MACHINE SHOP No way to lock tag machines for servicing.	Rose	4/1/92	
	Band saw - need guard for unused part of the blade.	Rose	4/1/92	
	Large bench grinder need tongue and work rests adjustments. Balder also.	Rose	4/1/92	
	Need chuck guard for Nazork 30 and American lathes.	Rose	4/1/92	
	Need housekeeping.	Rose	4/1/92	
	Fire ext. not sealed or inspected by office door.	Rose	4/1/92	
	CARPENTER SHOP			
	Fire ext. needs testing.	Rose		
	Radial arm saw does not return on its own.	Rose	4/1/92	
	Small breaker box not labeled.	Rose	4/1/92	
	No way to tag or lock the radial arm saw.	Rose	4/1/92	
	Small band saw belt guard not secured.	Rose	4/1/92	
	Back side of small floor fan not guarded properly.	Rose	4/1/92	
	Ladder to storage area rotted at the bottom. Needs to go three (3) feet above landing. Landing needs guard rails.	Rose	4/1/92	
	Overhead storage needs toeboards and midrails.	Rose	4/1/92	
	TOOLROOM Some star drills have mushroomed heads.	Rose	4/1/92	
	Need tongue guard on grinder. Need to clean eye shield.	Rose	4/1/92	
	Grinder brush is old and shedding wire bristles.	Rose	4/1/92	
	Electrical breaker not ID'ed.	Rose	4/1/92	

RAM 0001901

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Floor needs repair by drill press and work bench.	Name	4/1/92	
	SLING AREA BY PIPE SHOP Cloth slings are hanging on hooks are unserviceable due to wear.	Name	4/1/92	
	Several wire rope slings are damaged and need to be removed. No sling inspections.	Name	4/1/92	
	Trash in area.	Name	4/1/92	
	Some wire rope clips installed backwards on wire rope with turn buckle.	Name	4/1/92	
	GENERAL			
	Develop and implement a plan for inspecting the structural soundness of all storage tanks. This has been done for the 20 pressure storage vessels with some 16 having been inspected. Many atmospheric tanks have rust scale. Corrosion on some externally insulated tanks is visible and could be quite serious in areas not visible due to being covered by insulation.	Larry Name / Carlos Stennett Review Sect 5 (a) (1) Review/Regulatory And Research	3/1/92	
	MISCELLANEOUS			
	Fire hoses intended only for emergency use are used routinely for other non-emergency purposes. This should not be allowed, and a severe penalty imposed upon those that do not follow the plant rule. The use of fire water from hydrants for other routine purposes has already been discussed and will not be repeated here.	Name	5/1/92	
	GENERAL COMMENTS-WEST PLANT			
	The company that was doing asbestos insulation repairs was not utilizing an explosion-proof extension cord which was supplying 110 volts AC to their non-explosion proof vacuum.	Name	3/1/92	

RAM 0001902

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	There is no record,of steam turbine overspeed trip mechanism being maintained. The possibility for having an inoperative trip mechanism is great with serious consequences resulting in the event of a malfunction on an operating turbine.	Rusa	6/1/92	
	EAST PLANT			
	Product line (8") is off the support beams and in danger of falling near the Alky cooling tower.	Rusa	3/1/92	
	The old isocracker absorber stripper tower is severely corroded next to the concrete at base may become unstable. Similar condition on old tower east of the LEU.	Rusa	4/1/92	
	WEST PLANT SHOP (WELD SHOP)			
	Hand grinder not guarded in weld shop.	Rusa	5/1/92	
	Bench grinder rest and tongue not adjusted.	Rusa	5/1/92	
	Pipe shop loft. One ceiling light needs guard.	Rusa	5/1/92	
	Bad housekeeping	Rusa	5/1/92	
	Overheading crane pendant control not supported.	Rusa	5/1/92	
	MACHINE SHOP			
	Tongue guard not adjusted on stand grinder.	Rusa	6/1/92	
	Disconnects not ID'ed for hoists.	Rusa	6/1/92	
	No tongue guards on the stand grinder by south door.	Rusa	6/1/92	

RAM 0001903

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Lathe needs a chuck guard.	Name	6/1/92	
	None of the overhead bridge cranes have the capacity marked on the bridges at all three plants.	Name	6/1/92	
	EAST PLANT AUTOMOTIVE SHOP			
	Air compressor needs belt & pulley guard.	Name	6/1/92	
	Compressed air tank - no safety valve and gauge does not work.	Name	6/1/92	
	EAST PLANT INSPECTION DEPT.			
	Relief valves - Accurate lists and records of relief valves are not available for each area. Test schedule are not set. Relief valve sizing records are not readily available.	Name	6/1/93	
	ALKY			
	No chlorine institute cylinder repair kits in plant.	Name/Sirgo		
	QUINTANA MACHINE SHOP			
	Overhead hoist - limit switch not tested periodically.	Name	7/1/92	
	Overhead hoist - safety latch on hook worn out.	Name	7/1/92	
	Overhead hoist - No disconnect for lockout.	Name	7/1/92	
	Disconnect switches not ID'ed.	Name	7/1/92	
	Stand grinder - rest and tongue adjustments, wire brush is worn out.	Name	7/1/92	
	No loading signs for overhead storage.	Name	7/1/92	
	Le Blonde lathe - no chuck guard.	Name	7/1/92	

RAM 0001904

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Six five gallon cans near lathe area - no labeled.	Russ	7/1/92	
	Compressed gas cylinder not secured near Safety Kleen. Improper receptacle box near Safety Kleen.	Russ	7/1/92	
	Fire extinguishers not tested.	Russ	7/1/92	
	ELECTRICAL STORAGE			
	No guardrails for overhead storage.	Russ	6/1/92	
	Need housekeeping throughout the shop.	Russ	6/1/92	
	ALKYLATION AREA - EAST PLANT			
	Personnel platforms at tops and along sides of many columns are very badly corroded, structurally weak, and subject to eventual falling to the ground.	Russ	9/1/92	
	Explosion-proof light covers are missing at several areas of the plant.	Russ	9/1/92	
	Various electrical appliances in control house are not grounded to prevent personnel shock hazard.	Russ	9/1/92	
	Many steam leaks in plant present a personnel burn hazard from both steam and pulled hot condensate.	Russ	9/1/92	
	Many utility hoses laying on the ground with several connected to process equipment and utility station.	Russ	9/1/92	

RAM 0001905

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	A number of small (3/4" and 1") pipe drops coming to the ground from larger overhead pipelines with no bracing or supports. A failure will probably occur at the welded coupling at the larger pipe from eventual fatigue resulting with an uncontrolled spill of whatever material is in the larger pipe.	Name	9/1/92	
	Housekeeping of the area is unsatisfactory and needs considerable attention (55-gallon drums, trash, pipe fittings, etc.)	Name	9/1/92	
	Insulation on ground north of alkylation unit and next to EB columns possibly is asbestos which could present a potential personnel health hazard an/or liability issue.	Name	1/3/92	
	Gate valve stems along pathway of row of pumps (P-4, etc.) stick out horizontally at eye level and present a personnel hazard. Some means of covering these valve stem ends with guards could prevent injury.	Name	9/1/92	
	Nitrogen piping is not color coded, as prescribed in plant procedure D-5.	Name	9/1/92	
	Crows foot connected to nitrogen piping in direct violation of plant procedure D-5, which prescribes the use of special dedicated fittings. The concern is that someone will connect to the crows foot, believing the utility to be air when it is not.	Name	9/1/92	
	Pins are not used in crows feet utility hose connections to prevent hose from coming loose.	Name	9/1/92	
	Safety meetings have not been routinely conducted. Federal Training Guidelines.	Name	9/1/92	

RAM 0001906

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	No routine fire fighting equipment inspections are performed on fire extinguishers, fire monitors, etc.	Nuwe	9/1/92	
	Fire fighting emergency equipment is not uniformly painted red (some painted red, some painted yellow, some need painting.)	Nuwe	9/1/92	
	No routine testing of personnel emergency equipment to insure operability if needed. (Safety showers, eye wash baths, etc.)	Nuwe	9/1/92	
	Plant ladders are not inspected for damage with potential for personnel injury, if used.	Nuwe	9/1/92	
	Utility hose stations not labelled as to contents.	Nuwe	9/1/92	
	INSPECTION DEPARTMENT			
	Underground pipelines along with storage tanks are not provided with cathodic protection to prevent corrosion.	Nuwe	9/1/92	
	PIPE SHOP			
	Welders not wearing safety glasses near operations.	Nuwe	6/1/92	
	Crane disconnect not found.	Nuwe	6/1/92	
	MACHINE SHOP			
	Pendant control support by its own wire - overhead crane.	Nuwe	6/1/92	
	No latch on hook	Nuwe	6/1/92	
	No limit switch.	Nuwe	6/1/92	
	No inspection.	Nuwe	6/1/92	
	WEST END OF CARPENTER EATING AREA			

RAM 0001907

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Paint storage: Drum of flammable liquid Xylene-mix (Prop. Gly) used a tall valve on spigot instead of self closing valve.	Nuwe	6/1/92	
	Fire extinguisher - no inspection.	Nuwe	6/1/92	
	MISCELLANEOUS - EAST PLANT			
	Three (3) compressed gas cylinders of propylene standing upright inside shack at NE side of main electrical substation without any restrictions (chains, etc.) to prevent falling.	Nuwe	1/15/92	

RAM 0001908

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	GENERAL COMMENTS -WEST PLANT Emergency generator should be checked at least weekly to insure operability in the event of electrical power loss.	Wilcox	2/92	
	Critical instrument alarms are not routinely checked to insure their operability if needed.	Wilcox	3/1/92	
	A drum of methanol located on the west side of the recycle booster compressor should be provided with an electrical ground and a self-closing valve or faucet.	Wilcox	4/1/92	
	A permanent personnel barricade should be installed around the sulfur pit to prevent personnel from climbing onto the top and falling in.	Wilcox	9/1/92	
	The West Plant housekeeping was fairly good, but still needs attention to remove miscellaneous items like 55-gallon drums, hoses on the ground, trash inside vessel support skirts, etc.	Wilcox	3/1/92	
	Many "temporary" pipe lines laid on ground present personnel tripping hazard. These lines in many cases have been in use for years and should be installed as permanent lines.	Wilcox	6/1/92	
	Nitrogen piping not color coded as prescribed in Plant Procedure D-5.	Wilcox	3/1/92	
	Tank truck loading rack at the sulfur unit is in need of repair with a possibility for personnel to fall off.	Wilcox	4/1/92	
	There are two elevated Betz tanks in the utility area that contain corrosives that could be harmful to personnel's eyes. The use of cover goggles should be considered for this area.	Wilcox Why are these elevated? Signs?	4/1/92	

RAM 0001909

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Very bad hot crude oil leak at flange and valve on the north side of furnace B-6 provides a slipping hazard for personnel.	Wilcox	6/1/92	
	Holes have been cut into insulation at many locations to allow the Inspection Department to make audiogauge thickness measurements. Many of these holes have existed for years. These holes in the asbestos insulation should be plugged to prevent personnel exposure along with reducing the possibility of further corrosion by water getting inside the exposed insulation.	Wilcox Practice & Procedure change.	9/1/92	
	GENERAL COMMENTS - WEST PLANT			
	Many steam leaks throughout the west plant present both a burn hazard to personnel from the hot steam and condensate, but also a loss of valuable boiler condensate water.	Larry Wilcox	3/1/92	
	GENERAL COMMENTS - WEST PLANT			
	Caustic tanks with pumps and piping should be provided with protective flange guards and signs requiring personnel to wear goggles. The splattering of caustic in the eyes has been a dangerous personnel vision (blinding) situation in industry and must be avoided.	Larry Wilcox / Val DeLeon (Procedures) Investigation	4/1/92	

RAM 0001910

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	The 18 hydrogen sulfide detectors-monitors are of very questionable value, since a number of them were observed to be in the alarm stage. Operator dependance upon these devices to warn of danger is not too great. Since hydrogen sulfide was detected in a number of locations, an improved system for monitoring should be made available to prevent personnel injury. (Example: Hydrogen sulfide concentration is extremely high at coker Elliot compressor, gas oil low pressure separator, gas oil compressors, etc.).	Larry Wilcox / Val DeLeon / Investigation needed.		

RAM 0001911

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	CATALYTIC CRACKER UNIT (FCCU)			
	Plant ladders are not inspected for damage with potential for personnel injury if used.	Allbright	6/1/92	
	Safety cage with vertical ladder on column about 50 feet above the ground has a bolt missing securing ladder to side of column 12-A-21.	Allbright	6/1/92	
	MISCELLANEOUS - EAST PLANT			
	Fire water pipeline at NE corner of main electrical substation in very badly corroded condition.	Allbright Assessment	7/1/92	
	EAST PLANT			
	Both eye baths and showers near the sulfuric acid tanks need repairs. Main cooling tower.	Allbright	2/1/92	
	Potable water at eye bath is connected directly to a chemical tank. Main cooling tower.	Allbright	1/15/92	
	H2SO4 sump pit has a level of liquid in it.	Allbright	2/1/92	
	No flange guards on the acid lines.	Allbright	4/1/92	
	Recommend that a wire rope guard be stacked across entrance to the cooling water pump intake.	Allbright	4/1/92	
	H2SO4 tank vent needs for possible plugging.	Allbright	4/1/92	
	Need to label and cap the acid tank truck unloading connection	Allbright	4/1/92	
	Water treatment chemical tanks are not labeled adequately - Main cooling tower.	Allbright	4/1/92	
	FCCU			
	Two platforms on south side of Co Blr. one ladder gate not in place. No ladder gate on other side.	Allbright	6/1/92	

RAM 0001912

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Need ladder gates on south side of precipitator and four on the north side.	Allbright	6/1/92	
	No NH3 respirator - two tanks.	Allbright	6/1/92	
	NH3 hose has 5 threaded at tank and 8 joints at other end. Using Chicago pneumatic coupling. Hose not marked "Anhydrous Ammonia".	Allbright	6/1/92	
	Trash and saw horse at base of fire monitor next to NH3 tanks.	Allbright	6/1/92	
	No test of sprinkler systems.	Allbright	6/1/92	
	150# STM to Riser - steam trap not in service on the 150# hdr. Need automatic KO pot and drain as well as the present manual bleeders.	Allbright	6/1/92	
	Ruptured steam hose in service on ground between FCCU & Dir.	Allbright	6/1/92	
	Fuel gas knockout pot manual drain to sewer. This does not go to a center location in case the valve sticks open.	Allbright	6/1/92	
	Fuel gas KO safety valve. Two block valves not sealed open. Dir. chg. to flare hdr. - valve closed. No ASME pressure vessel plate.	Allbright	6/1/92	
	PC walnut htr. #1. Safety block valves not sealed.	Allbright	6/1/92	
	12 -A21 ABS Tower. Continuous ladder. No offsets.	Allbright	6/1/92	
	12 -A-25 Sponge Oil Tower. ASME pressure vessel plate painted over. Need to determine need for a safety valve on the KO pot.	Allbright	6/1/92	
	There are H2S warning signs at north end of control room. There are no H2S respirators for use in the area in lieu of no monitors being present.	Allbright	1/15/92	

RAM 0001913

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	ALKY			
	Loose guy wire attached to pole supporting the high powered electrical lines at the main substation - east end. Can be blown into power lines.	Allbright	8/1/92	
	Oil leak from one transformer.	Allbright	8/1/92	
	Pipe bridge from nonane to alky. Need permanent access to large water gate valve. Scaffold is there now.	Allbright	8/1/92	
	Control room pressurization not working according to gauge on panel board.	Allbright	8/1/92	
	Air intake for control rooms is 10 ft from gauge glass on knock out drums.	Allbright	8/1/92	
	Crow foot connection is used on suction of combined feed pump to add water at times.	Allbright	8/1/92	
	Water draw off from the feed drum is manually controlled to pad once/shift two valves condensate from dryers is drained to pad once/shift one valve. Neither go to a safe location. Saturate receiver also. Two valves.	Allbright Pipe any further.	8/1/92	
	Tank #11 - feed to nonane. Two manual drains. Pointed towards spheres. Used to purge water layer. Three more for alky; 131, 125, and 126. Need closed systems or safe locations.	Allbright	8/1/92	
	Broken cross brace on tank 235.	Allbright	8/1/92	
	Alky cooling tower - chlorine feed tubing broken at the cylinder rotameter.	Allbright	8/1/92	
	Severe external corrosion on vertical bullet tank #126 at the foundation pads.	Allbright	8/1/92	
	#126 sample valve leaks and the sample line needs support.	Allbright	8/1/92	

RAM 0001914

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	No fire extinguishers in Alky feed tank farm.	Allbright	8/1/92	
	Open pit, with hydrocarbons, near tank 125.	Allbright	8/1/92	
	Non explosion proof extension cords used in Alky feed tank farms. No MWP for this.	Allbright	8/1/92	
	Water and oil stands under Alky feed spheres.	Allbright	8/1/92	
	Bolts missing in 8" nozzle under tank 132. Bad corrosion for piping. Open end 3/4" valve on bottom head.	Allbright	8/1/92	
	HF storage tank relief valve closed in by block valve and slip blind due to scrubber out of service.	Allbright	8/1/92	
	Alky has airline respirators for working, but nothing for escape.	Allbright	8/1/92	
	CATALYTIC CRACKER UNIT (FCCU)			
	Streets for motor vehicles pass extremely close to process equipment and could provide a ready source of ignition in the event of a process leak or spill. (This comment is not restricted to the FCCU area, but appears to be fairly universal throughout Coastal's facilities. Refer to 1-3 above.)	Allbright	8/1/92	
	Nitrogen and plant compressed air are piped together to provide a backup to the instrument air supply in the event of a loss of air pressure. A check valve with gate valves are provided to prevent cross contamination, but a more positive and foolproof system should be provided, since cross contamination can occur from leakage.	Allbright	8/1/92	
	There is no guard on coupling between CO blower and its motor drive.	Allbright	8/1/92	

RAM 0001915

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	There is no guard on coupling on motor fan gear boxes on fin-fan coolers.	Allbright	8/1/92	
	Housekeeping of area is unsatisfactory and needs considerable attention (55-gallon drums, trash inside vessel skirts, etc.)	Allbright	8/1/92	
	Fire hoses not inspected and could have deteriorated to point of failure if placed in use during an emergency.	Allbright	8/1/92	
	Many utility hoses laying on ground with several connected to process equipment.	Allbright	8/1/92	
	No eye wash facilities provided in the vicinity of precipitator switch gear room containing acid storage batteries.	Allbright	8/1/92	
	Precipitator switch gear room has explosion-proof electrical fittings along with non-explosion-proof fittings. Electrical classification of area needs defining.	Allbright	8/1/92	
	Explosion-proof light fixture cover is broken on top floor of structure in vicinity of 12-A-25.	Allbright	8/1/92.	
	Critical instrument alarms are not checked to insure their operation when needed.	Allbright	8/1/92	
	Emergency electrical generator needs periodic testing to insure operability when needed.	Allbright	8/1/92	
	Noise area warning signs not uniformly posted throughout the area.	Allbright		
	CO boiler wall observed to be moving back and forth. Evaluate need for strengthening to prevent possible fatigue failure.	Allbright	1/30/92	

RAM 0001916

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Utility hose stations not labelled as to contents.	Allbright		
	Utility hoses not periodically checked, with some observed to be in questionable condition.	Allbright		
	Pins are not routinely used in cross feet utility connections to prevent hose from coming loose.	Allbright		
	FCCU contains considerable quantities of asbestos insulation. Many locations had damaged insulation which should be properly required to prevent personnel exposure.	Allbright		
	Nitrogen hose station is not color coded as required by plant procedure 0-5.	Allbright		
	No routine fire extinguisher inspections conducted.	Allbright		

RAM 0001917

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	QUINTANA PLANT HYDROCRACKER			
	Cross feet in fuel pot liquid level for CH4 heater.	Dungan	6/1/92	
	Suction relief valve to the makeup H2 compressor has a shutoff valve and its not sealed in the open position.	Dungan	6/1/92	
	Unguarded floor openings by "A" H2 comp.	Dungan	6/1/92	
	Drip trap from high pressure cold separator does not have adequate pipe support.	Dungan	6/1/92	
	Handle on the screen of the suction of unconverted oil pump is not distinguishable from that of a slip blind.	Dungan	6/1/92	
	Vent from the lube oil recovery tank has H2S and the vent is too close to ground level. Needs rerouting and warning signs.	Dungan	6/1/92	
	Vent on lube oil tank for recycle compressor has H2S and is too low for operating area.	Dungan	6/1/92	
	Section on piping of H2 vent to flare. Should be plugged in.	Dungan	6/1/92	
	Section of the H2 recycle compressor is set up with one 3/4" valve being closed from atmosphere at the nitrogen tie in. 2000 psi g H2.	Dungan	6/1/92	
	No manometer gauge for pressurized control room.	Dungan	6/1/92	
	Two respirators - four operators.	Dungan	6/1/92	
	No ladder gate on top of 10-V-20 tank.	Dungan	6/1/92	
	Equipment in unit is not labeled or ID'ed. Tank of MDEA also not labeled.	Dungan	6/1/92	

RAM 0001918

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Door to electrical control room corroded away at the bottom. Lathe broken.	Dungan	6/1/92	
	Electrical control room has material stored on floors behind breakers.	Dungan	6/1/92	
	Need to develop butane sampling to avoid flushing to atmosphere - near furnace.	Dungan	6/1/92	
	Open ended valve on Rt. ex. outlet of jet fuel to storage.	Dungan	6/1/92	
	Fractionator column reflux line is supported on unsupported overhead line at third level.	Dungan	6/1/92	
	South water storage tank needs to be tested. Leaks are evident near top, but across the top the top is not blocked. Employees may fall through. Tank failure would gas the area with H2S.	Dungan	6/1/92	
	Automatic water drain from the foot of the naphtha overhead accumulator discharge to atmospheric (open) drain underground near heaters. Instruments may malfunction and cause fire.	Dungan	6/1/92	
	Ball Valve on naphtha line to storage from cooler can easily be bumped open by anything. Valve handles not secured closed.	Dungan	6/1/92	
	Fuel gas knockout pot drained water automatically to open sewer. Instrument malfunction will cause fire.	Dungan	6/1/92	
	Respirators are not used for pulling H2S contaminated samples.	Dungan	6/1/92	
	Automatic shutdown instruments are not tested during turnarounds.	Dungan	6/1/92	

RAM 0001919

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	TBA - BTX - HDS			
	Four operators - two respirators (air supplied) no respirators for routine sampling of benzene and H2S streams.	Dungan	8/1/92	
	Water draw off from recovery column overhead receiver water boot. Continuous to pad manual control. Leave alarms in control room. Aromatics above the water. Sulfulane unit.	Dungan	8/1/92	
	Benzene overhead receiver water boot - manual draw off to oily water.	Dungan	8/1/92	
	Condensate line and control valve by toluene tower needs insulation for burn protection.	Dungan	8/1/92	
	Exchange 6E008 head needs burn protection.	Dungan	8/1/92	
	Prefractionator column overhead receiver water drag is auto controlled to oily sewer. Can release H2S and light hydrocerbons.	Dungan	8/1/92	
	Nitrogen cross tie to instrument air has a double valve and vent, but no check valve to prevent air from entering nitrogen.	Dungan	8/1/92	
	Utility drops need labeling in HDS unit.	Dungan	8/1/92	
	Need ladder gate on top of guard reactor.	Dungan	8/1/92	
	No access to platforms on the four reciprocating recycle compressors. No guard rails.	Dungan	8/1/92	

RAM 0001920

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	No alternate means of egress from reformer reactor platforms.	Dungan	8/1/92	
	1st and 2nd stage relief valves on the makeup compressors have shutoff valves before flare header and are not "sealed" open.	Dungan	8/1/92	
	No Benzene Danger signs posted.	Dungan	8/1/92	

RAM 0001921

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	EAST PLANT			
	Asphalt loading rack - a) Trucks arrive with wet emulsion in them and cause the asphalt to boil over from the dome while loading. Need to require dry tank trucks. b) Loading arm counter weights not adjusted regularly causing drivers to strain backs placing the spout. May need redesign. c) Ramp from loading rack does not provide adequate guardrails for placing spouts in dome.	Chernetski Re-issue instructions to loaders.	3/1/92 3/1/92 8/1/92	
	Condensate Tank - a) No ladder gate on ladder. b) Guard rails needed on top where ropes are. c) Tank needs HOT top and sides. Top needs to be done before walking on. Condensate is corrosive. d) Third rung on ladder is badly bent.	Chernetski	6/1/92	
	BOILER HOUSE			
	No eye wash or shower near tank of Betz 3667 which is corrosive.	Chernetski	6/1/92	
	Relief valve on #450 feed pump turbine is closed in by a block valve.	Chernetski	1/15/92	
	Temporary floor hole where vacuum hose is in trench - east side of #1 boiler.	Chernetski	2/1/92	
	VISBREAKER - MTBE			
	Visbreaker overhead water discharged to oily water sewer direct by level control. No redundancy. If you lose the water level you get high H2S and gasoline vapors in the area. Should go to closed system only.	Chernetski	8/1/92	

RAM 0001922

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Oxygen respirator in control room is not full. Inspected in 1987. Scott air pack is full. No other respirators in unit.	Charnetski	8/1/92	
	Unplugged bleeder valves on the visbreaker, overhead water. Also on base of Xylene tower.	Charnetski	8/1/92	
	Floor holes and uneven trench covers at trench northwest of visbreaker columns.	Charnetski	8/1/92	
	Back side of belt and pulley guard on the visbreaker - overhead relief gas compressor not guarded.	Charnetski	8/1/92	
	No H2S hazard warning signs in the unit.	Charnetski	8/1/92	
	Sample gas cylinder with propane next to analyzer shed is badly corrupted on bottom.	Charnetski	8/1/92	
	Ladder next to analyzer shed - no ladder gate.	Charnetski	8/1/92	
	Xylene overhead receiver - no guard rails on platform. No plug in drain from liquid level instrument header.	Charnetski	8/1/92	
	Fire extinguisher inspected in Jan. 1990.	Charnetski		
	Sprinkler system - not test operated.	Charnetski		
	Electric control room needs housekeeping.	Charnetski	8/1/92	
	Electric adapter from explosion proof to non explosion proof receptacles in service in electric control room - extension cord is there for use.	Charnetski	8/1/92	
	Open ended pipe by turbine in electric control center.	Charnetski	8/1/92	
	Pressure indicator shows no pressure in pressurized control room. Control room doors are corroded through.	Charnetski	8/1/92	

RAM 0001923

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Fire water used for control room A/C. Many other misuses of fire water in plant.	Chernetski	8/1/92	
	SULFOLANE BTX			
	Second level scaffold under valves near control needs to be replaced or removed. Boards are old.	Chernetski	9/1/92	
	Adapter used for explosion proof to non-explosion proof receptacle for Betz tank in the BTX area.	Chernetski	9/1/92	
	Operators not respirator fit tested.	Chernetski	9/1/92	
	BOILER HOUSE (EAST PLANT - PRELIMINARY)			
	Hot condensate tank leaking at base.	Chernetski	6/1/92	
	Several water utility hoses connected to fire hydrant being used for non-fire fighting purposes. Availability of supply of water in the plant could be jeopardized in an emergency from uncontrolled use by plant personnel.	Chernetski	6/1/92	
	MTBE UNIT - EAST PLANT			
	Hydrogen sulfide exposure can be of sufficient concentrations at times to warrant the installation of permanent gas detectors and alarms to adequately warn employees.	Chernetski	9/1/92	
	Critical instrument alarms are not checked to insure their operation when needed.	Chernetski	9/1/92	
	Safety meetings are not routinely conducted. Federal Training Guidelines.	Chernetski	9/1/92	

RAM 0001924

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Emergency generator for providing emergency lighting in unit has been provided, but is inoperable and should be repaired.	Chernetski	9/1/92	
	Instrument air supply has no emergency backup in the event of loss of pressure (which has almost occurred). Nitrogen is available in the area and could be utilized as a means of backing up the instrument air system. HOWEVER, if this is done, the system must be designed such that no possible inadvertent cross contamination of either stream can occur.	Chernetski	9/1/92	
	Nitrogen piping not color coded as prescribed in plant procedure D-5.	Chernetski	9/1/92	
	Utility hose stations not labelled as to contents.	Chernetski	9/1/92	
	Explosion-proof light covers are missing in several areas, including the area of the xylenes accumulator and its overhead condenser. Electrical junction box cover also is missing near the stairs leading to this accumulator.	Chernetski	9/1/92	
	MTBE unit contains considerable quantities of asbestos insulation. Many locations had damaged insulation which should be properly repaired by personnel qualified to work with asbestos to prevent personnel exposure.	Chernetski	9/1/92	
	Many various size pipelines are either not structurally supported or have been supported with the use of failing wire.	Chernetski	9/1/92	
	Housekeeping of the area needs attention (considerable trash inside of vessel support skirts, presence of empty drums, etc.).	Chernetski	9/1/92	

RAM 0001925

SAFETY WORK LIST - SPECIAL

UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Grounding cable for column D-8 is broken at ground level.	Chernetski	9/1/92	
	Checks for operability of steam turbine over speed trip mechanisms are made, sometimes when turbine repairs are made. There are no records maintained to insure that all turbine trip mechanisms are eventually tested and it is possible for some turbines to never be tested.	Chernetski	9/1/92	
	No provision for automatic shutdown of heater fuel in the event of a loss of flow of material being heated within tubes can result in the rupture of heater tubes (and fires, etc.).	Chernetski	9/1/92	
	The four MTBE reactors operate with an exothermic reaction between isobutylene and methanol. If the flow of methanol is lost, the reaction can run away with potentially dangerous consequences. The interlock which has been installed on the methanol flow to the reactors which blocks in automatically the flow of isobutylene if the methanol flow stops has been made inoperative. If this system cannot be made to operate as it should, some other automatic system to prevent a run-away should be provided to protect the plant and its personnel.	Chernetski	9/1/92	
	<u>BIX/SULFOLANE - EAST PLANT</u>			
	Critical alarms on various instruments are not tested to insure operability.	Chernetski	9/1/92	
	Many unsupported lines, with some lines being supported with baling wire.	Chernetski	9/1/92	

RAM 0001926

SAFETY WORK LIST - SPECIAL				
UNIT	ITEM	ACCOUNTABILITY	DUE DATE	COMMENTS
	Electric motor switch on "bottoms pump east" is different from other motor switches and cannot be locked in "off" position.	Charnetski	9/1/92	
	Large section (3' X 10') of metal insulation cover is hanging loose from the heat exchanger located above "DIP FD/BOTTS" vessel and could injure personnel.	Charnetski	9/1/92	
	Housekeeping of area needs improving (trash inside of vessel support skirts, empty drums, hoses on ground, etc.).	Charnetski	9/1/92	

RAM 0001927

RAM 0001894