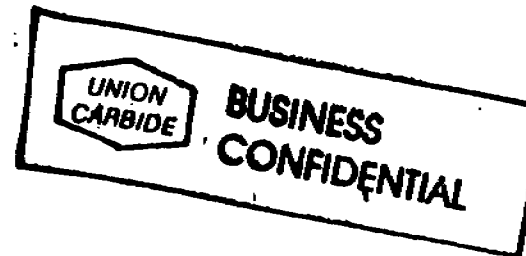


TEXAS CITY PLANT
1982 PERSONNEL SAFETY & HEALTH AUDIT
ACTION PLAN



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PERSONNEL HEALTH

NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
1.	The following procedures need to be issued and implemented: - Hand Held Abrasive Blasting - Asbestos Removal Procedure	I.B.5.	An Asbestos Handling Procedure and Hand-Held Abrasive Blasting Procedure that incorporate the practices used and required are being developed for inclusion into the Maintenance/Materials Procedures Manual.	Maintenance Shops Department Head	2nd qtr '83
2.	Entry/Fatal Protection Policy needs updating. (repeat)	I.B.5.	Plant procedure has been revised and forwarded to managers for final approval.	I.H. Director	Feb. '83
3.	Noise/Hearing Conservation Procedures do not mention exposure monitoring within 60 days of a process change. They also do not require notification of employees within 21 days if daily exposure is above 85 dBA.	I.B.5.	Revised plant procedure on Noise and Hearing Conservation is being developed for introduction to Plant Procedures Committee in first quarter 1983.	I.H. Director	2nd qtr '83
4.	Chemical data sheets in several units were either not up to date or were missing in several unit manuals.	II.C.	(1) Purchasing is in process obtaining MSDS's on materials current in plant. (2) Review of unit chemical data sheets will be included in 1983 Unit Safety Hazard Review which covers entire plant.	Unit Department Head	4th qtr '83
5.	Drager sampling tubes are being improperly used to measure TLV's in barges and tankers prior to physical entry by product handlers.	III.D.2 (d)(6)	A new video tape training program on the selection and use of toxic gas/vapor measuring instruments will be released in February 1983.	I.H. Director	Feb. '83

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TEXAS CITY PLANT
1982 PERSONNEL SAFETY & HEALTH AUDIT

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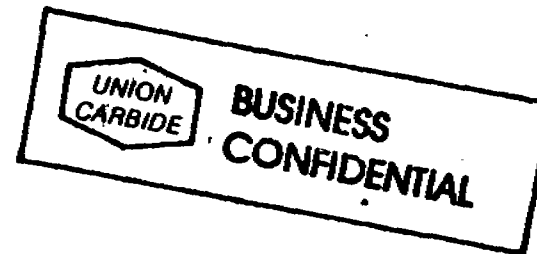
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PERSONNEL HEALTH

(cont.) p. 2

NO.	DEFICIENCY	AIRCT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
6.	Welding was performed without source exhaust ventilation. Welder's helper was not wearing a proper hood and barrier curtains were not used.	IV.D.	(1) Source ventilation in open area is only required when welding other than mild steel. Available ventilation is currently being upgraded in pipe and structural shop. (2) Barrier curtains will be evaluated 1st qtr '83. Welders and helpers are issued and required to use proper protective equipment including welding hoods. Incident observed was an isolated occurrence.	Maintenance Shops Department Head	3rd qtr '83
7.	Contractors do not always follow UCC safety & health procedures on Asbestos.	III.E.3 (2)	The Maintenance procedure on asbestos handling will be completed 2nd qtr and a copy of the procedure and the training program will be provided to Maintenance Contract Services Division for implementation.	Maintenance Shops Department Head	2nd qtr '83
8.	Contractors do not always follow UCC safety & health procedures: Medical surveillance is questionable.	III.E.3 (3)	A program is already in place.	Maintenance Shops Department Head	Complete
9.	Many cases of hypersensitivity to amines were not reported and logged per UCC guidelines.	IV.A.1	One hypersensitivity case for '82 has been reported.	Medical Director	Complete
10.	Those Dept. Head MOP's and quarterly reports reviewed did not include health items.	IV.E.	A proposal will be developed for plant management's consideration and subsequent implementation thru the line organization.	HS&EA Manager	1st qtr '83

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PERSONNEL SAFETY

NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
1	The number of variances to Plant Safety Procedures appears to be excessive. The related procedures need to be reviewed with an objective to reduce the exceptions.	I.A, Page 1	The Texas City Plant stresses getting exceptions when deviating from Plant Procedures. The Plant Procedures review form was revised to cover review of exceptions for possible inclusion. Exception review form was revised to provide specific paragraph for which exception is required. Review has been tightened and requests returned for clarification where required.	Safety Director	Initial 12/82 Continuing
2	Some Departmental Safety Manuals contain outdated Plant Safety Procedures. (Repeat)	I.B.1, Page 1	Plant Procedures should not be in unit safety manuals. This was affirmed in the November Plant Procedures Committee meeting. Plant Procedures are to only be kept in Plant Procedures Manuals. A letter was sent to the Department Heads pointing this out. The plant "Unit Safety and Health Review" program will include this as an inspection item.	Safety Director	Initial 12/82 Continuing
3	A Plant Evacuation Procedure could not be located. (Repeat)	I.B.2, Page 1	This procedure was in existence and issued at the time of the audit. The primary problem is that the procedure is contained in the Emergency Information Manual, which has an extremely limited distribution due to confidential material. A special effort will be made in 1983 to publicize the existence of this procedure.	Safety Director	3 Q '82

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PERSONNEL SAFETY

NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
4	The following procedures need to be issued and implemented --Cranes Near Power Lines (Repeat)	I.B.5, Page 2	This procedure has received APM endorsement and will be sent to the Plant Manager for final approval. A variance to SH-112 has been written and is being routed for approval. A training program is being developed for this procedure by the Maintenance Department.	Safety Director	1st Qtr '83
5	--Scaffolds	I.B.5, Page 2	A Maintenance & Materials Management Procedure is being developed for this subject.	Shop Maintenance Department Head	2nd Qtr '83
6	--Off-Site Transportation of Personnel	I.B.5, Page 2	This procedure has been approved by the Plant Procedures Committee and will be sent to the APM's for endorsement in the first quarter.	Safety Director	2nd Qtr '83
7	--Work from Elevated Surfaces	I.B.5, Page 2	The first draft of this procedure was introduced in the January Plant Procedures Committee meeting. This procedure will be the most difficult one in the audit to implement. Even the Safety and Fire Protection Department is uncertain if it can meet the letter of the UCC procedure.	Safety Director	1st Qtr '84

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NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
8	The Plant Vapor Cloud Procedure does not cover oxygen enriched clouds (SH-106).	I.B.5, Page 2	This topic had not even been considered in development of our current procedure. It will be incorporated as part of the 1983 update. An interim article will be provided in the Supervisors' Safety Newsletter to notify the plant population.	Plant Procedures Committee Shift Dept. Head	4th Q '83
9	The Master Tag Procedure is not completely clear on what/when craft personnel locks are required.	I.B.5, Page 2	The Plant Procedures subcommittee currently working on this procedure has been notified of the deficiency. This correction will be incorporated in the revised procedure.	Plant Procedures Committee Production Dept. Head	3rd Q '83
10	The six-month follow-up on LEL and Operator PM scheduling is ineffective. Accountabilities for follow-up should be clarified/assigned.	I.B.5, Page 2	Department Heads have been notified of this item. Approximately 65% of the deficiencies have been corrected. The Personnel Safety Clerk is responsible for follow-up. Operators will be reminded of this requirement in their annual mandatory safety training.	Safety Director	3rd Q '83

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PERSONNEL SAFETY

NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
11	Numerous eye baths throughout the plant are not in accordance with the Safety and Health Technology Standards.	II.A., Page 3	No wholesale replacement is planned at this time. Increased emphasis will be placed on keeping drains open. In lieu of any major repairs to the existing eye baths, they will be replaced with UCC approved units. A survey will be conducted to determine the number of these units.	Safety Director	Continuing
12	Many Departmental Accident Prevention Committees (DAPC's) are inactive and some departments don't have committees.	II.A., Page 3	Increased emphasis will be given to the DAPC's in 1983. The Managers' group will make a presentation to the department heads indicating the thrust in this program in 1983.	Managers Department	4th Q '83
13	Excessive variances.	III.A.1, Page 4	See Item No. 1.	--	--
14	Many of the deficiencies identified in the 1980 audit have not been corrected.	III.A.1, Page 4	These items are highlighted in the responses to this audit. Special emphasis is being given to assure these are corrected in a timely manner.	Safety Director	Continuing

TEXAS CITY PLANT
1982 PERSONNEL SAFETY & HEALTH AUDIT
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PERSONNEL SAFETY

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NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
15	The Safety Training Records Program data is not creditable due to information being incomplete. As the program will be the official record, care must be taken to ensure all training is properly entered. (Repeat)	III.D.1.(b), Page 5	The audit showed that the record system is accurate. The major problem is a lack of faith in the system by first line supervisors. An attempt will be made to allow Maintenance and Operations to input directly to allow problems to be corrected immediately in the field rather than awaiting feedback.	Safety Director	4th Q '83
16	Field Maintenance Engineers have minimal involvement in Safety Training.	III.D.2.d.(2), Page 6	The Maintenance Department has listed this as one of their safety action items. The FME's will receive the mandatory safety training plus the annual hazards review for the production units for which they are responsible.	Tech Services Maint. Dept. Head	4th Q '83
17	Contractors do not always follow UCC safety and health procedures 1. Scaffolds and Ladders	III.D.(3).1.	There does not appear to be a major problem at the present time with the maintenance contractors. However, the new UCC scaffold procedure will be provided to these contractors. This group will be regularly monitored by the Contract Maintenance Services Division for compliance.	Maint. Shop Dept. Head	2nd Q '83 Continuing

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PERSONNEL SAFETY

NO.	DEFICIENCY	AUDIT REFERENCE POINT	ACTION REQUIRED	RESPONSIBILITY	COMPLETION DATE
18	Many non-standard scaffolds were in use throughout the plant.	IV.D., Page 10	These scaffolds were checked and found to belong to the site construction contractor (Bechtel). A copy of the UCC scaffold procedure will be provided to the contractor.	UCC Construction Site Manager	4th Q '83
19	Hazardous Work Permits are used on non-hazardous jobs which may dilute the effectiveness of the program.	IV.D., Page 10	The Texas City Plant uses a "Work Authorization Form" for most non-hazardous work. This will be re-emphasized. We will lightly emphasize not using the HWP for non-hazardous work. If we must err, we prefer it to be in this direction.	Safety Director	2nd Q '83
20	Repeat audit items from 1980 audit.	IV.F.2.	See Item 14.	--	--