7472.

SM-32 (REV. 5-78)

PLAINTIFF'S EXHIBIT

SH-2387

Shell Oil Company
Interoffice Memorandum

AUGUST 10, 1988

FROM: STAFF INDUSTRIAL HYGIENIST, PRODUCTS HEALTH & SAFETY

TO: SEE ATTACHED DISTRIBUTION LIST

SUBJECT: HEALTH & SAFETY RESOURCE INFORMATION

Attached for your information are a new health and safety procedure and set of audit checklists which are now in use by Wood River Mfg. Complex. You may want to consider any applicability the attached resource has to your location.

P. J. Snyder

P. J. Snyder

PJS:bjd

Attachment

cc w/attachment

O. D. Long

cc w/o attachment

R. C. Newell

LAM 002769

BJT8822302

DPMC-08898

DISTRIBUTION LIST

MANUFACTURING LOCATIONS

ANACORTES REFINERY
MANAGER, HEALTH, SAFETY AND ENVIRONMENT

DEER PARK MANUFACTURING COMPLEX
MANAGER, HEALTH AND SAFETY

GEISMAR PLANT
MANAGER, HEALTH, SAFETY AND ENVIRONMENT

MARIETTA PLANT
MANAGER, HEALTH, SAFETY AND ENVIRONMENT

MARTINEZ MANUFACTURING COMPLEX
MANAGER, HEALTH AND SAFETY

NORCO MANUFACTURING COMPLEX
MANAGER, HEALTH, SAFETY AND MEDICAL

ODESSA REFINERY
MANAGER, HEALTH, SAFETY AND ENVIRONMENTAL

TAFT PLANT
SAFETY AND TRAINING REPRESENTATIVE

WILMINGTON MANUFACTURING COMPLEX
MANAGER, HEALTH, SAFETY AND ENVIRONMENTAL

PRODUCTS DISTRIBUTION LOCATIONS

METAIRIE PLANT
MANAGER, HEALTH, SAFETY AND ENVIRONMENT/Q.A.

SEWAREN PLANT
MANAGER, Q.A./HEALTH, SAFETY AND ENVIRONMENT

SHELL OIL COMPANY
WOOD RIVER MANUFACTURING COMPLEX

WRMC INDUSTRIAL HYGIENE REVIEW PROGRAM	COMPLEX PROCEDURE BOOK I, S 1.09
PAGE 1 OF 3	ORIGINAL ISSUE 5/88

PURPOSE

This procedure is intended to assure that WRMC is meeting the objective of maintaining a healthy work place and meeting the requirements of health regulations.

SUMMARY

To meet the objective, this program requires a review of each BPU, Central Maintenance, QA, and Purchasing every two years. The review will be a combined effort of Departmental personnel and the H&S staff. The review will focus on the requirements of the existing IH related Complex Procedures.

TOPICS COVERED

The review will include the following topics:

-Hearing Conservation	S 1.05
-Respiratory Protection	S 3.05
-Radiation	S 1.07
-Ceramic fibers	S 1.03
-Reporting Suspect Hazards	S 1.08
-Hazard Communications	S 1.04
-Chlorine	F 3.01
-Embryo-fetus	memo
-VDT's	memo
-Benzene	S 1.01
-Asbestos	S 1.02
-Lead	S 1.06
-Acid King and PVC protective clothing	S 3.04
-Work around Inerted Equipment	S 4.04
-Hazardous waste sites	memo
-Mandatory H&S Training	S 4.13
-Environmental Monitoring Equipment	--
-Ventilation Systems	--

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REVIEW TEAM MEMBERSHIP

A Review Team will be formed to conduct each review. The Team will include two representatives from H&S and two representatives from the department being reviewed.

The membership should be selected to promote effective communication between the Department personnel and the H&S staff. A good understanding of IH requirements is essential to the success of the program.

It is expected that the Review Team members will gain information that will increase WRMC capability to do the preventive activities necessary to have a healthy work place both in procedure and practice.

GUIDELINES

Checklists or self audits covering the IH requirements have been developed to facilitate the reviews and focus on requirements. During the review, comments in response to compliance with a particular requirement should be written directly on the checklists. Industrial Hygiene will maintain and update the lists as needed.

RESPONSIBILITIES

A. SENIOR INDUSTRIAL HYGIENIST

1. Has overall responsibility for the program.
2. Publish a schedule each year of the units to be reviewed. Approximately one every two months.
3. Select the H&S participants for each review.
4. Designate the H&S participant to be team leader.
5. Assure checklists/self audits are updated.
6. Request names of department participants.

B. DEPARTMENT MANAGER BEING REVIEWED

1. Select two department participants for the review.
2. Issue status report every two months to his Superintendent and Manager H&S until all items are resolved.

LAM 002772

C. REVIEW TEAM LEADER

1. Arrange the date within the assigned month to conduct the review.
2. Conduct a planning meeting with review participants to schedule interviews, determine records to be spot checked, and which checklists are applicable.
3. Conduct the review in one day.
4. Verbally report out to the Department Manager at the close of the review.
5. Issue a written report to the Manager within one month of the review including the checklists.

APPROVAL:

SUPERINTENDENT
TITLE

SIGNATURE

REVIEWER:

MANAGER HEALTH & SAFETY
TITLE

SIGNATURE

ORIGINAL ISSUE

LAM 002773

DPMC-08902

RESPIRATORY PROTECTION PROGRAM & RESPIRATORY MANUAL S 3.05

	Yes	No
Are the jobs or activities in the area classified per Table I?	___	___
Are employees training records maintained (Section 7 - Manual)?	___	___
Is the content of the training documented?	___	___
Are employees in the department physically able to wear a respirator?	___	___
If needed, do personnel required to wear full face respirators have the spec kit?	___	___
Are respirators available and ready for routine or emergency use?	___	___
Are respirators properly stored, inspected?	___	___
Do personnel know how to get and return respirators?	___	___
Are JEP's in Appendix A of Respirator Manual?	___	___
Are personnel familiar with the positive and negative field fit procedure (Section 8 - Manual)?	___	___
Do employees have respirator type/size sticker on hard hat?	___	___
Are supervisors/employees familiar with selection criteria for respirators (Appendix C)?	___	___
Do employees maintain facial hair so that it does not interfere with proper fit and operation of the respirator?	___	___

WMC/mah
3/10/88

LAM 002774

DPMC-08903

HAZARD COMMUNICATION

PM 13.12

SELF AUDIT

A. APPROVAL OF NEW CHEMICAL SUBSTANCES (II)*

1. REQUIREMENT - All new chemical substances must receive a Health and Safety review by Industrial Hygiene prior to being brought into the Complex.

2. ASSESSMENT

Do people in the Department who approve purchases understand this requirement?

yes_____ no_____

Have any new chemical substances been purchased during the last year?

yes_____ no_____

If so, check purchase requisitions for IH initials.

yes_____ no_____

B. IDENTIFICATION OF CONTENTS OF "FIXED VESSELS" (III,B,1)

1. REQUIREMENT - The person operating a unit must be able to identify the contents of fixed vessels (tanks, columns, exchangers etc.) in the area. Also, the operator must locate the appropriate MSDS for the contents of a vessel and convey that information to crafts and others verbally and by the precautionary measures on a permit.

2. ASSESSMENT

Are signs posted at normal approaches to the unit or area?

yes_____ no_____

*-refers to section in procedure

Is the Fixed Vessel Toxic Substance book available?

yes_____ no_____

Does the operator on duty know what the contents of the exchangers, tanks, vessels, pumps, piping are? (pick four fixed vessels at random and ask what is in the vessel and ask to see the MSDS)

knew_____ didn't know_____

Do the permits for vessel work (where the vessel will be opened) indicate the process contents and appropriate protective equipment? - Check the last three permits.

yes_____ no_____

C. EQUIPMENT THAT LEAVES THE OPERATING AREA (III,B,2)

1. REQUIREMENT - When equipment leaves the custody of the responsible operating department, it must be properly tagged.

2. ASSESSMENT

Do the operating and maintenance foremen know this is required? Do the truck drivers picking up the equipment know?

yes_____	no_____	operations
yes_____	no_____	maintenance
yes_____	no_____	truck drivers

Do the foremen know that an additional red tag is required for equipment that has been in acid or caustic service?

yes_____ no_____

Has any equipment left the unit during the last month? Where was it sent? If yes, check with receiving department to determine if the equipment was properly tagged.

properly tagged_____ not_____

D. QUALITY CONTROL SAMPLES (III,B,2)

1. REQUIREMENT - All samples being sent to the QA lab or taken to the unit lab must have sample tags that identify the contents.

2. ASSESSMENT

Do the operators know this requirement?

yes_____ no_____

Check three samples. Are tags on? If so, are the contents noted?

yes_____ no_____

Are special cautions such as acid, caustic noted?

yes_____ no_____

E. LABELS ON CONTAINERS (III,A,2)

1. REQUIREMENT - All containers other than those covered under 'fixed vessels' must be properly labelled (examples: 55 gal. drum, lubsters, anti-freeze, 5 gal. cans, cardboard barrels.)

2. ASSESSMENT

Do people understand the requirement? Randomly ask six unit personnel.

yes_____ no_____

Check all containers for legible labels. Drums, bags, lab reagents.

yes_____ no_____

F. MATERIAL SAFETY DATA SHEETS (IV)

1. REQUIREMENT - Using departments are responsible for acquiring and maintaining MSDS's for all chemical substances they have present. The MSDS book must be indexed and readily available to employees.

2. ASSESSMENT

Is there a MSDS book in the zone shop and control room?

yes_____ no_____ control room
yes_____ no_____ zone shop

Is there a Shell 'Users Guide' there also?

yes_____ no_____

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Is there an alphabetized listing of the substance and Shell MSDS number?

yes____ no____

Do the MSDS's all have a Shell control number?

yes____ no____

Is someone assigned to keep the MSDS's up to date?

yes____ no____

Does that person know how to request an MSDS?

yes____ no____

F. EMPLOYEE TRAINING AND INFORMATION (V)

1. REQUIREMENT - Employees who work with chemical substances must receive training prior to assignment and annual refresher training.

2. ASSESSMENT

Check the records of five employees to see that they have received refresher training within the last 12 months.

yes____ no____

Have any new people been assigned in the last three months? Do the records show they received either basic training (new employees) or department specific training (transferred employees) at the time of their assignment?

yes____ no____

Are there copies of the training outline for new and transferred employee?

yes____ no____

ASBESTOS AUDIT SHEET

	YES	NO
1.) Are units and buildings which contain asbestos insulation properly posted?	____	____
2.) Are BPU personnel familiar with the health hazards associated with over-exposure to asbestos? Ask 3 people.	____ ____ ____	____ ____ ____
3.) Are BPU personnel familiar with precautions that need to be taken before during and after asbestos removal? Ask 3 people.	____ ____ ____	____ ____ ____
4.) Are BPU personnel familiar with procedures for identifying asbestos insulation? Ask 3 people.	____ ____ ____	____ ____ ____
5.) Are BPU supervisors and insulators familiar with asbestos disposal procedures? Ask 2 supervisors.	____ ____	____ ____
6.) Is supervision aware of EPA notification requirements? Ask 2 supervisors.	____ ____	____ ____
7.) Are BPU personnel aware of areas that contain asbestos insulation? Includes management. Ask 2 people.	____ ____	____ ____
8.) Do BPU personnel observe Regulated Areas?	____	____
9.) Are signs and banner tape (asbestos) used to demarcate a Regulated Area?	____	____
10.) Is personal protective equipment worn when it is needed?	____	____

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11.) Have BPU personnel been given asbestos awareness training in the last year? Check 3 employee training records. ____ ____
____ ____
____ ____

12.) Is there exposed asbestos insulation in the area? Includes buildings. ____ ____

13.) If the answer is yes to 12 then are measures being taken to fix the problem? ____ ____

14.) Are there areas which need immediate attention? ____ ____

15.) Does BPU manager have long range plan for dealing with asbestos containing materials in his/her area? ____ ____