

Monsanto

FROM (NAME & LOCATION)

George Orum - 2PD

PLAINTIFF'S EXHIBIT

MON-2056

DATE March 23, 1982

cc. Sam Graves
R. S. Jackson

SUBJECT Procedure Bulletin P-0118

REFERENCE

TO : J. A. Glass

Procedure Bulletin P-0118 was recently revised (2-17-82), and supervision has been instructed to review this bulletin with their work force.

Various questions have arisen regarding what the procedure covers and what its intent is, and I must admit that some clarification would be desirable. Questions raised and suggestions offered include the following:

1. Title: Work Permit for Off-Battery Work, and Use of Heavy Equipment Near Electrical Lines

This title leads one to believe that the permit deals with two subjects and that a work permit is needed for the performing of off-battery work regardless of whether or not electrical lines are involved.

An improved title might be: Performance of Work Where Unintentional Contact with Electrical Lines is a Possibility.

2. Purpose: As written, the purpose seems to speak to providing control of off-battery work in general and to providing control of work near electrical power distribution lines.

An improvement in this section might read: Purpose - To provide control of work near electrical power distribution lines to assure personnel safety and to avoid loss incident.

The problem with this procedure is a basic lack of clarity. From my conversations with various plant personnel, it is my understanding that this procedure was written for controlling only work where possible contact with electrical lines exists. It is with this understanding that the above suggestions are made.



George Orum

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PROCEDURE BULLETIN — TEXAS CITY PLANT P-0118

WORK PERMIT FOR OFF-BATTERY WORK, AND USE OF HEAVY EQUIPMENT NEAR ELECTRICAL LINES

I. PURPOSE

To provide control of work in off-battery auxiliary equipment, pipelines and near electrical power distribution lines; to assure personnel safety and avoid loss incidents.

II. SCOPE

This procedure bulletin covers permits for work done in off-battery pipe racks, auxiliary equipment and other installations outside of the battery limits of operating areas where a Fire and Entry Permit as outlined in Bulletin P-0117 is not required; ~~and heavy, or other work~~ equipment used within 10 feet of electrical power lines, or equipment located such that it is within possible contact distance of power lines, whether under, alongside or over such lines. This bulletin also covers the off-battery movement within the plant perimeter of Non-Monsanto heavy equipment to assure no contact will be made with overhead installations.

III. DEFINITIONS

- A. "Electrical Power Lines" includes open wire pole lines and is applicable to poles, conductors and guy wires, cable trays, aerial suspended cables and transformer stations.
- B. "Heavy Equipment" implies booms, man lifts, scaffolds, hoisting equipment, hoisting lines and tag lines.
- C. The "initiator" is the operating supervision requesting that the work be done, or the "maintenance supervisor" responsible for heavy equipment activity in the proximity of electrical power lines.
- D. The "owner" is the supervision of that area which produces the fluid flowing in the pipe on which work is to be done. The producer generally owns the lines to their termination point, or, if there are several users, the producer owns the lines up to a battery limit block valve. The "owner" of the electrical distribution system, is the electrical engineer who is supervisor of the system, or his alternate, the system foreman.
- E. The "maintenance supervisor" will, in most cases covered by this procedure, be the "owner's" maintenance area supervisor or functional craft supervision. On construction projects, he may be the construction supervisor responsible for the project.
- F. The "work permit" is the blue form that will be used for all work done under this procedure. In case of doubt as to whether this work permit or a fire permit (red form) should be used, use the fire permit. In the case of work near electrical distribution lines, this permit is required.

IV. RESPONSIBILITIES

- A. The "initiator" initiates the work permit, or he may ask the owner to prepare the permit.

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REVISED: 1-25-82

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WORK PERMIT FOR OFF-BATTERY WORK, AND USE OF HEAVY EQUIPMENT NEAR ELECTRICAL LINES

- B. The "initiator" of the work permit shall be at the job site during work procedures where loss risks are involved.
- C. A change in work plans after a work permit is issued voids the original work permit. A new work permit must be obtained.
- D. The "owner" is responsible for preparing the equipment for work, the safe conditions for doing the job, obtaining the necessary signatures and informing other supervision concerned with the work to be done. The owner issues the permit to the maintenance supervisor and requests assistance from the Loss Prevention Department if such assistance is required.

"Owners" of "hazardous" lines (ACY, LN, Cl₂, HCN), and electrical distribution cables in the pipe rack where the work is done, must be signatory to the permit.

The authority for the function of the "owner" may be delegated to any level of supervision agreed to by the Manufacturing Superintendent. If joint ownership occurs, both "owners" shall make independent checks of the work area before affixing their signatures to the permit. The primary "owner" then issues the permit.

- E. The chief operators of the "owner" area and of the area in which the work is to be done shall also sign the permit, indicating that the equipment has been prepared for the work and that they have knowledge of the work to be done.
- F. The "maintenance supervisor" to whom the permit is issued is responsible for the work to be done. He makes his own inspection of the work area, makes certain he understands the provisions of the permit and any special instructions by the "owner" and signs the permit. He is responsible for giving careful instructions during the work, carrying out any special precautions specified by the permit, for the inspection of the completed job and for the return of the permit to the "owner". If, during the period of the permit, it is necessary to change personnel doing the work, the "maintenance supervisor" is responsible for the instruction of the new crew for the safe performance of the job.
- G. The Night Superintendent represents all supervision when that supervision is absent from the plant, and therefore, acts in the capacity of supervision as specified above. In such cases, the Night Superintendent shall obtain the signatures of the chief operator of the "owner" area and of the area in which the work is to be done, as required above.

V. PROCEDURE

- A. A work permit shall be issued only to an employee of Monsanto who is responsible for the work to be performed.
- B. The "initiator" initiates the permit.
- C. The "owner" prepares the equipment, obtains necessary approval by signature on work permit, informs other concerned departments, and issues the permit to the "maintenance supervisor".

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D. All valves isolating a piping system to be worked on must be locked in the proper position or may be blinded or broken out.

E. The "maintenance supervisor" in charge of the work to be done shall see that all workmen involved are informed of the work permit requirements.

F. When the work is completed, the "maintenance supervisor" returns the permit to the "owner".

G. The "owner" cancels the permit and informs the concerned departments of the completion of the work.

H. Off-battery movement of Non-Monsanto heavy equipment requires an electrical permit to assure no contact will be made with overhead lines.

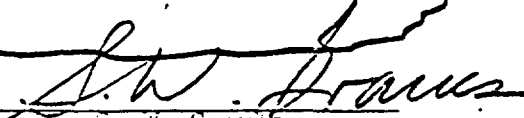
I. Except for those employees assigned to electrical distribution, an electrical work permit is required prior to performance of any work in a transformer station or switching station.

Reviewed by:

Plant Manager's Safety Board

Date _____

Revised by:


S. W. Graves

Approved by: _____

J. A. Glass

Approved by: _____

G. L. Tromblee

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