Mechanical Integrity

MANAGEMENT SYSTEMS

REFERENCES: OSHA Process Safety Management
(1910.119, Paragraph J)

A .1. Yes [X] No [] Do you have written procedures to assure on-going integrity of process equipment? (i.e., pressure vessels, EBV's, fire protection systems, etc.)
Plans: Procedures in plant library contain operating discipline that addresses this. Also, the Pressure Vessel Group's records contain this information.

A 2. Yes [X] No [] Are the employees involved in maintaining the on-going integrity of process equipment given an overview of the process and its hazards, and trained in the procedures applicable to their job.
Plans: In-Plant Training (IPT) for each operator and staff member - currently being done.

A 3. Yes [X] No [] Do inspection and testing procedures follow Dow site or Division guidelines?
Plans: Inspections and tests are performed by a centralized group in the division that functions according to site guidelines.

A 4. Yes [X] No [] Do the frequency of inspections and tests of process equipment meet accepted Dow site or Division guidelines?
Plans: See answer above.

A 5. Yes [X] No [] Are all inspections and tests documented as per Dow guidelines?
Plans: Pressure Vessel Group documents and plant receives copies.

A 6. Yes [X] No [] Are suspected deficiencies corrected in a safe and timely manner after necessary means are taken to assure safe operations.
Plans: Deficiencies are noted and relayed to the plant to correct at the earliest possible time.

A 7. Yes [X] No [] In the construction of new plants and equipment, is equipment fabricated according to Dow site or Division standards and suitable for the process application for which they will be used?
Plans: Plant piping and equipment material specs are followed.

A 8. Yes [X] No [] Are appropriate checks and inspections performed to assure that equipment is installed properly and consistently with design specifications?
Plans: Management of Change program is in place.

B 9. How do you assure that maintenance materials, spare parts and equipment are suitable for the process application for which they are being used? Some parts are color-coded. All are tagged for the job they will be used on. Titanium parts are stored separately. MOC process is followed.
Plans: Working on adopting chlorine plant procedure to lock-up small titanium parts and to positively identify unlabeled parts with MTS's Texas Nuclear Device as necessary.

B 10. How do you assure the proper materials of construction are used in maintenance and new projects?
Plans: Plant piping and material specs and MOC program.

B 11. Yes [X] No [] Do you have a list of the proper gaskets for each part of your process? (LPP 6.6)

Plans: Included in piping and equipment specs.

Yes [X] No [] Is gasketing covered in your piping specification?