ABD00109267

To: Ted Nickerson

From: Keith Bailey KB

Date: June 23, 1994

VISTA

Interoffice Communication

Subject: Process Safety Management Progress Report

The following is a summary of progress that has been made toward the compliance of OSHA 29 CFR 1910.119.

EMPLOYEE PARTICIPATION:

To date, approximately 58 employees of the Aberdeen Plant has been directly involved in the implication of PSM. Both hourly and salary employees have worked together in the planning and execution of the Aberdeen PSM policy.

what about delineation

what about union representatives

PROCESS SAFETY INFORMATION:

Chemical Hazards:

Information pertaining to chemical hazards is available in Material Safety Data Sheets. MSDSs for each area of the plant are maintained by the safety department.

[illegible] about 24 hr availability

Process Flow Diagrams:

Process flow diagrams have been completed for the VCM tank farm. CAD files have been created for most of the diagrams of the Old Module. The remaining areas of the plant have not been assigned.

New [illegible] Water Plant

Process Chemistry:

Process chemistry for the identified areas are completed except for the mechanisms of hydroquinone. R and D is currently evaluating possible mechanisms. Chemistry information is not necessary for the VCM tank farm, dryers, utilities, and SA module. Water Plant chemistry has not been completed.

Maximum Intended Inventory:
Safe Upper/Lower Limits:
Consequences of Deviation:

All of these areas are included in Operating Procedures.

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Material of Construction:

Material of construction information are included on P&IDs. All of the equipment for the VCM Tank Farm and Old Module is completed. The majority of equipment in the remaining areas is completed. However, there is still some items that remain to be checked. Updating the equipment specifications for the New Module and SA Module is assigned to BKB. What about water plant?

P&IDs:

P&IDs are completed for all areas of the plant. A system is also in place for the maintenance of these diagrams.

Electrical Classification:

Write ups for existing classified areas are being finalized. Currently, information is being gathered to support the reclassification of P-1. Remaining work has been assigned to WCE and TRM.

Relief Documentation:

Relief Documentation is completed for the VCM Tank Farm and the Old Module. Documentation for the SA Module and New Module is assigned to BKB. The remaining areas have not been assigned.

Material and Energy Balances:

Material and energy balances are only required for the water plant and the new boiler. The balances have not been completed on either of these projects. complete with PFD's

Safety Systems:

Safety systems for the vinyl area are maintenance in the DCS.

PROCESS HAZARD ANALYSIS:

PHAs have been completed for the vinyl tank farm and the Old Module. However results have not been communicated, potential hazards have not been addressed, and a sighting study has not be conducted. The PHA process for the New Module, SA Module, and the catalyst freezers is currently being initiated. But process safety information needs to be completed in these areas before progress can be made. The remaining areas have not been assigned. But we have a documented priority list

OPERATING PROCEDURES:

Operation procedures are completed for the Old Module and the Vinyl Tank Farm. Procedures for the Water Plant are written and awaiting approval. The writing of procedures for the New Module and SA Module will be complete by July 94. The remaining vinyl procedures ~~is~~ are scheduled to be completed by December '94. Typing and approval are still bottle necks in the process. ?

TRAINING:

JDO is handling this. Amount of progress is uncertain.

[illegible] admin

CONTRACTORS: ???

PSSR:

Procedures for Pre-start up Safety Review is currently in place for all area.

MECHANICAL INTEGRITY:

Amount of progress is uncertain. However responsibility policy is currently awaiting approval.

HOT WORK PERMIT:

Hot work permit program is in place and used throughout the plant.

MOCA:

Management of change procedures are currently being used with all process changes in the plant.

INCIDENT INVESTIGATION:

Procedures for the conduct of an incident investigation is maintained by all areas of the plant. incident file with list

EMERGENCY PLANNING AND RESPONSE:

The plant's emergency response has recently been reviewed and is up to date.

AUDIT:

DCS is coordinating audits on a company wide basis.

PROCESS SAFETY MANAGEMENT UPDATE

EMPLOYEE PARTICIPATION:

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X	X	X	X	X

NOTES: To date 58 people have been involved in the development and execution of the PSM policy.

PROCESS SAFETY INFORMATION:

Chemical Hazards Information (MSDS)

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X	X	X	X	X

NOTES: Copies of MSDS are maintained by the Safety department. However, there are copies in plant that are not being maintained.

Process Flow Diagrams

VS	OM	NM	SA	DY	UT	BP	WP
X	/	NS	NS	NS	NS	NS	NS

NOTES: PFDs files have been created for the Old Module. Only operating parameters remain.

Process Chemistry

VS	OM	NM	SA	DY	UT	BP	WP
NA	/	/	NA	NA	NA	NA	NS

NOTES: The process chemistry for the Old Module is completed except for the mechanisms of hydroquinone. Two possible mechanisms have been proposed.

Maximum Intended Inventory

VS	OM	NM	SA	DY	UT	BP	WP
X	X	/	/	NS	NS	/	/

NOTES: This requirement is included with operation procedures.

Safe Upper/Lower Limits

VS	OM	NM	SA	DY	UT	BP	WP
X	X	/	/	NS	NS	/	/

NOTES: This requirement is included with operation procedures.

Consequences of Deviation

VS	OM	NM	SA	DY	UT	BP	WP
X	X	/	/	NS	NS	/	/

NOTES: This requirement is included with operation procedures.

Process and Instrumentation Diagrams

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X	X	X	X	X

NOTES:

Electrical Classification

VS	OM	NM	SA	DY	UT	BP	WP
/	/	/	/	/	/	/	/

NOTES: Writes up for existing classified area are being finalized. Unsure on the progress for the SA, DY, UT, and WP areas.

Relief Documentation

VS	OM	NM	SA	DY	UT	BP	WP
X	X	/	/	NS	NS	NS	NS

NOTES: Relief documentation for NM and SA are currently underway.

Material and Energy Balances

VS	OM	NM	SA	DY	UT	BP	WP
NA	NA	NA	NA	NA	NA	NS	NS

NOTES: Material and energy balances are only

Safety Systems

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X				

NOTES:

PROCESS HAZARD ANALYSIS:

VS	OM	NM	SA	DY	UT	BP	WP
/	/	/	/	NS	NS	NS	NS

NOTES: The hazard analysis is complete for VS and OM. However, results have not been communicated, identified hazards have not been addressed, and a sighting study has not been completed. The hazard analysis for NM and SA is in the preliminary stages.

OPERATION PROCEDURES:

VS	OM	NM	SA	DY	UT	BP	WP
X	X	/	/	NS	NS	/	/

NOTES: Operation procedures for the NM and SA are nearly the write up stage. They all will be written by July '94. Typing and approval still remains to be accomplished. Procedures for WP are awaiting approval.

TRAINING:

VS	OM	NM	SA	DY	UT	BP	WP

NOTES:

CONTRACTORS:

VS	OM	NM	SA	DY	UT	BP	WP

NOTES:

PSSR:

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X	X	X	X	X

NOTES: PSSRs are conducted on all changes that require a MOCA.

MECHANICAL INTEGRITY:

VS	OM	NM	SA	DY	UT	BP	WP

NOTES: Policies describing area responsibility has been develop and awaiting approval.

HOT WORK PERMIT:

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X	X	X	X	X

NOTES:

MANAGEMENT OF CHANGE (MOCA)

VS	OM	NM	SA	DY	UT	BP	WP
X	X	X	X	X	X	X	X

NOTES: