



Dow U.S.A.

**DOW NORTH AMERICA
CONSOLIDATED AUDIT PROGRAM**

The Dow Chemical Company
P O Box 150
Baton Rouge, Louisiana 70765-0150

Methanes Plant

Date of Report: 6/19/95

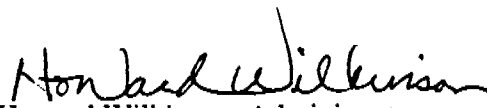
Superintendent: Don Taylor, Bldg. 4601

cc: Roddey Peebles, Bldg. 1601, LAD	Buck Bailey, Bldg. 3301W, LAD
Maurice Oubre, Bldg. 6650, LAD	Vick McMurry, Bldg. 4601, LAD
Chris Messelt, Bldg. 3502W, LAD	Terry Leigh, Bldg. 1601, LAD
John Murphy, Bldg. 101, Freeport, TX	Greg Schultz, Bldg. 1601, LAD

Enclosed are the recommendations from the Occupational Health Audit for your response. According to the Dow North American Area Consolidated Audit Program Guidelines and the OSHA Process Safety Management (PSM) standard 1910.119, you must develop an implementation plan as a response to the recommendations. The plan must include the name(s) of the employee(s) assigned to each action item along with an expected completion date for each item. Your plan must be reviewed and approved by the area Major Manager by July 21, 1995.

Please note that efforts have been made by the Functional Audit Teams to help prioritize each recommendation. They will be identified as: M = Must Do, (based on compliance issues, government regulations, Dow policies or S&LP) and HR = Highly Recommended, (necessary to mitigate an anticipated or potential hazard).

Please send your approved implementation plans to Connie Kalencki, Bldg. 3502W by July 28, 1995. We will forward a copy to members of the Core Audit Team and the Functional Team Leader.


Howard Wilkinson, Administrator
LAD Consolidated Audit Program

PRODUCED FOR THE ASBESTOS DATABASE
DATE: 6/20/95
MASTER No. 432460 HJ

DO A 032427
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OCCUPATIONAL HEALTH AUDIT

(Thursday, May 18, 1995)

AUDIT TEAM: Darlene Creel, Bruce Heinze, Maralee Marchant,
John Jurgiel

PLANT IH

CONTACT: Hank Grace, Mike Brown

ATTENDING: Howard Wilkinson, Ronnie Fitzgerald, Jackie Paul,
Darlene Creel, Terry Williams

WRITER: Jackie Paul/Maralee Marchant

GENERAL INDUSTRIAL HYGIENE/MEDICAL

The IH Manual is complete and the OSHA form 2203 detailing the worker's rights under OSHA is posted.

Recommendations:

- HR 1. The refrigerator and oven in B-4606, and the refrigerator in B-4610 maintenance break room need cleaning.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- HR 2. The area around outfall site #1521 needs housekeeping (i.e. broken, discarded PVC floating device, tape, rope).

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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M = Must-Do

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HR = Highly Recommended

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- M 3. Some chemicals were stored behind the door in the lab. The leaking stem valve needs to be replaced on the box of Lang Caustic.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 4. The boxes being stored need the eyewash need to be relocated.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 5. Need to create a letter documenting compliance with benzene and vinyl chloride regulations during emergency burns from Vinyl II.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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HAZCOM PROGRAM

The labeling of plant equipment was good and process vessels, columns and pumps were all numbered. The HAZCOM/MSDS notebooks are readily available in the control room. Personnel received annual hazcom training in March, 1995.

Recommendations:

- M 1. The following labeling related deficiencies need to be addressed:
- 5 gallon containers of antifoam in old control room; one unlabeled and one with an illegible label
 - Chemical container with torn label and one outside shop area not labeled.

M = Must-Do

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HR = Highly Recommended

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- c. unlabeled pressurized sprayer on loading rack
- d. AH-16 has several glass bottles not labeled properly
- e. unknown substance in bucket under steps by outfall #1521

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 2. The written hazcom program is dated April 1993 and needs review for currency.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 3. The Chemical and Physical Agent Inventory was last updated in November, 1992 and needs updating to include maintenance chemicals.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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HEARING CONSERVATION

The plants' written Hearing Protection Program was last reviewed in August, 1992. The OSHA Occupational Noise Standard, 29 CFR 1910.95, is posted on the bulletin board. Annual training was presented in March, 1995. We support your efforts to make the entire plant a Hearing Protection Area.

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HR = Highly Recommended

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Recommendations:

- M 1. The drill press located in the shop area needs to have a PPE sign to include "hearing protection required".

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 2. Review the written hearing protection program for currency.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 3. Addition area warning signs need to be posted (near K-1100).

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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RESPIRATORY PROTECTION

The plants' written Respiratory Protection Program was reviewed in 1994. The air line respirators are equipped with the correct match of regulator and exhalation valve and annual respiratory protection training was presented in March, 1995.

Recommendations:

- M 1. Several mouth-bit respirators were found lying around without owner name. These should be discarded or appropriately labeled.
(instrument shop; ladies restroom, lab)

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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M = Must-Do

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HR = Highly Recommended

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- M 2. The written program needs to be reviewed for currency and should include visitors and non-Dow employees.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 3. Several full-face respirators need to be properly stored (i.e. not in secondary containers, hanging by the straps).

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- HR 4. The respirator cleaning station needs to be cleaned up (remove the broken mask facepiece and the bottle of Shell oil).

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 5. Several regulators in the old control room have inspection dates of September 1991 and October 1992. These should be inspected by Vallen every 18 months. There is a regulator hanging on a fence in the shop area which needs to be stored properly and

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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PERSONAL PROTECTIVE EQUIPMENT

The plant's written program is dated August 1994 and all personnel were trained in February 1995.

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M = Must-Do

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HR = Highly Recommended

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Recommendations:

- M 1. The written program needs reviewing for currency.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- HR 2. There is a need for a place to store PPE in an accessible manner. PPE was found discarded in several places throughout the plant.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- HR 3. There is a sign in the MAPP motor control center denoting the availability of protective clothing however the PPE is located in another MCC across the plant. We recommend the sign be modified to state where the PPE is located. This MCC does have 440 switches denoting PPE required.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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ERGONOMICS

Recommendations:

None at this time

THERMAL STRESS

Recommendations:

No recommendations at this time.

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M = Must-Do

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HR = Highly Recommended

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VENTILATION

The laboratory fume hood is equipped with a flow sensing device. The comprehensive hood survey evaluation is current.

Recommendations:

- M 1. Investigate the reason for the oxygen alarm in Analyzer house #12.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- HR 2. The air conditioner in the analyzer house #AH-1 was not operating, although entry requirements stipulate the need for it to be operational. Either repair unit or change entry requirement sign on door.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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WELDING

Health Hazard Warning Signs (for fumes and rods) were posted in welding areas of the shop. Sources of ventilation for the welding area include a floor fan, wall fan, and a large doorway nearby.

Recommendations:

- M 1. Acquire new MSD sheets for welding rods used in the shop.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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M = Must-Do

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ASBESTOS

There is an asbestos handling decision flow diagram posted on the bulletin board for general information; however it is not the latest version and should be replaced with current version. The inventory was last performed in 1993 and is still current provided any changes are documented.

Recommendations:

- M 1. Need to perform and document annual inspection of asbestos containing material for condition.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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- M 2. There is an old piece of transite in a bag that needs to be disposed of outside the maintenance shop as well as some gaskets.

Action Taken/To Be Taken:

<i>Responsibility</i>	<i>Expected Completion Date</i>	<i>Actual Completion Date</i>
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