

Ethanolamines/Glycol Ethers Tier 3 Safework/Operating Policy

Section Number: 2004
Issue Number: 1.0
Original date: 06-19-95 **Author:** R. Pepitone L. White
G. Townsend M. Buhler
Title: Safety Observer Requirements
References: Safety Reference C-1, Safety Observers
S-312, Hot Work

=====

2004 Safety Observers

1.0 Objective:

- 1.1 To clearly define the plant's position and policy with respect to the use of safety observers for hot work jobs, vehicle entry etc.
- 1.2 Safety observers are required on jobs which:
 - 1) Are highly hazardous themselves (as defined by OSHA or division safety standards).
 - 2) Could become highly hazardous due to the effect of work in an adjacent area.
 - 3) Could introduce a hazard to work in adjacent areas.

2.0 Definitions:

- 2.1 Safety Observer - the person (Dow or Contractor) designated the responsibility to ensure safe completion of a job.
- 2.2 Hot Work - Any work using an open flame, open ignition source, high temperature producing apparatus, or spark producing equipment, such as cutting, burning, welding, drilling, or grinding.

3.0 Responsibilities:

- 3.1 It is the responsibility of the Operations Supervisors to insure that assigned safety observers are qualified.
- 3.2 It is the responsibility of the person writing the permit to assign safety observers as needed.

- 3.3 Safety observer:
- A) Participate in Permit on-site inspection or review Permit and procedures specific to the job.
 - B) Ensure that jobs are performed in accordance with permit procedures and in compliance with all applicable Safety Standards or References.
 - C) Ensure proper emergency procedures are followed.
 - D) Intervene, up to and including shutting down the job, if non-compliance's are observed.
 - E) Perform behavior observations as requested
 - F) Report repeat offenders to proper Dow supervision.

4.0 Policy:

- 4.1 A safety observer is required for flame/heat generating hot work such as welding, cutting, grinding and drilling (exceptions may be made for drilling) for the following areas:
- 1) Area 1 south of the chain
 - 2) Area 2 south of the chain
- 4.2 An initial sniff only will be required south of the chains in areas 1 and 2 to operate any gas or diesel equipment (tow motors, JLG's etc.) unless operation of this equipment will be within the "Hearing Protection" areas around the Sundyne pumps in areas 1 and 2 and the D-101 and D-101A storage tanks. Vehicle use in these areas requires a safety observer. Consideration may be given to the use of an explosimeter during work for all other areas south of the chains.
- 4.3 Hot work performed in area 3, tank truck rack, tank car rack, the drumming building and all other areas will require an initial sniff only, unless the circumstances warrant a continuous safety observer. This will be determined by the individual issuing the permit. If the hot work is to continue after 12:00 PM another initial sniff is required.