DOW LOUISIANA DIVISION CONSOLIDATED AUDIT

J. J. MULLER

MAY 29, 1991

Louisiana Division

Consolidated Audit Program

05/91

BENEFITS of CONSOLIDATED AUDIT APPROACH

Organized Approach to Required Audits

More Efficient Use of [illegible] Personnel Time

Good Training Experience

Thorough Preparation Required

Team Approach Required

Gets the Experts Together

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Core Audit Team

Plant Superintendent

Safety Superintendent

(If possible, a Superintendent from another plant could be invited to be a member of the Core Audit Team.)

Technology Center Representative

LAD Audit Facilitator

NOTE: Core Aduit Team will attend entire audit (3 days).

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Functional Audit Team/Leaders

Safety	Don Jones
Chemical Exposure Index (CEI)	Jim Gibson
Hazardous Materials Transportation (HMTI)	Dean Smith
Occupational Health	Gary Meier Geof Kusch
Reactive Chemicals	Gerald Wagener
Loss Prevention	Buck Bailey
Security	Al Lott
Other Audits * Electrical * Burner Management	Charlie Peters

AUDIT PROCESS	BEFORE/AFTER AUDIT
1. Send questionnaires to Plant Superintendent for distribution to plant team.	2-3 months before
2. Plant team member contacts professional counterpart to help fill out questionnaire, identify needs, and propose corrective action.	
3. LAD audit facilitator has pre-audit conference with Plant Superintendent and plant team.	1 month before
4. Any "other" audits/inspections completed.	2-3 weeks before
5. Questionnaires returned to LAD audit facilitator and then distributed to functional audit team leader.	10 days before

AUDIT PROCESS	BEFORE/AFTER AUDIT
6. Three day audit. (Tue, Wed, Thu)	
7. LAD audit facilitator coordinates recommendations into one report for the plant.	2 weeks after
8. Plant reviews report/actions with Major Manager (-> General Manager) and replies to core audit team with implementation plans.	45 days after
9. Plant issues follow up status report.	6 months after
10. In keeping with OSHA Star, plant issues final status report.	1 year after
11. Technology Center conducts technology review.	1 year after

LOUISIANA DIVISION CONSOLIDATED AUDIT

TIME: 7:30 a.m. - 4:00 p.m.

CONSOLIDATED AUDIT AGENDA
(Proposed Agenda)

Tuesday

7:30 - 11:30	Plant Presentation and Tour (see separate detailed guideline)
11:30 - 12:00	Lunch
12:00 - 1:30	Hazardous Material Transportation Review (HMTR)
1:30 - 1:45	Break
1:45 - 4:00	Chemical Exposure Index (CEI)

Wednesday

8:00 - 8:30	Electrical Audit
8:30 - 11:30	Reactive Chemical Review
11:30 - 12:00	Lunch
12:00 - 4:00	Occupational Health Audit

Thursday

7:30 - 11:30	Safety Audit
11:30 - 12:00	Lunch
12:00 - 3:00	Loss Prevention/Fire/Security Audit
3:00 - 4:00	Other Audits

LAD
CONSOLIDATED AUDIT

Tuesday, 7:30 - 11:30

AGENDA
(Proposed)

Plant Presentation/Discussion/Tour

I.	Process and Unit Operations	90 minutes

- Process Description
- Process Flow Sheets
- Process Chemistry Including Side Reactions
- Instrumentation
- Critical Instrument Devices and Function
- Plot Plan Layout

II.	Organization	10 minutes
III.	Review of Plant/Department Policies/ Procedures and Communications	20 minutes
IV.	Review of Training and Retraining Programs	30 minutes

V. Review of Significant Incidents/ Major Concerns — 30 minutes

- Losses
- Reactive Chemicals
- Safety
- Medical

VI. Plant General Tour (break into functional groups) — 60 minutes

- Projects
- Areas of Concern
- Maintenance Shops
- Motor Control Centers
- Eating Facilities
- Labs

HW:cmk
06-07-91

LOUISIANA DIVISION

CONSOLIDATED
AUDIT PROGRAM
SCHEDULE 1991

Status		
Completed (Poly A Working On Action Plans)	Poly "A" Plant Robbie Stevens	May 28, 29, 30
Scheduled	Chlorine Plant Joe Muller	July 29, 30, 31
Scheduled	Vinyl II Chris Messelt	September 10, 11, 12
Scheduled	Power 1/Utilites Ken Fox	October 15, 16, 17
Scheduled	Glycol I Jim Henry	November 5, 6, 7
Scheduled	Caustic Carl Mercer	November 19, 20, 21
To be scheduled	Cell Service Roddey Peebles	1st Quarter, 1992
To be scheduled	Vector SBC Max Williams	1st Quarter, 1992

HW:cmk
06/91

CONSOLIDATED AUDIT GUIDELINE

SUPERINTENDENT/DEPARTMENT HEAD ROLE

THE SUPERINTENDENT/DEPARTMENT HEAD IS RESPONSIBLE TO ORGANIZE AND LEAD THE AUDIT FOR HIS/HER PLANT. HE/SHE IS RESPONSIBLE TO WORKOUT A SWAP IF THERE IS AN UNAVOIDABLE CONFLICT AND INFORM THE LAD AUDIT GROUP.

1. RECEIVES THE AUDIT PACKAGE FROM THE LOUISIANA DIVISION AUDIT GROUP 2-3 MONTHS BEFORE THE AUDIT DATE.

2. CONFIRMS THE AUDIT DATE AND NOTIFIES THE MAJOR MANAGER, TECH CENTER, AND SAFETY SUPERINTENDENTS OF THE DATES FOR THE AUDIT.

3. GETS HIS/HER PLANT TEAM ORGANIZED, REVIEWS THE PREVIOUS CONSOLIDATED AUDIT, DELEGATES THE AUDIT QUESTIONNAIRES, AND GIVES INSTRUCTIONS AND TIME TABLES FOR PREPARATION.

4. SOME SPECIFIC AUDIT PREPARATION REQUIREMENTS FOR THE PLANT SUPERINTENDENT ARE:

   A. ARRANGE FOR THE MAJOR MANAGER (OR SECTION MANAGER), A PROCESS ENGINEERING REPRESENTATIVE AND A SUPERINTENDENT FROM ANOTHER DEPARTMENT TO SERVE ON THE C.E.I. AUDIT TEAM.

   B. WORK WITH THE LOUISIANA DIVISION SAFETY MANAGER TO DEVELOP A PRACTICAL EXERCISE TO BE USED IN THE C.E.I. AUDIT.

   C. IF THE C.E.I. FOR ANY OF THE CHEMICALS IN THE PLANT IS GREATER THAN 300, THE U.S. AREA LOSS PREVENTION MUST BE INVITED TO THE AUDIT.

   D. IF THE HMTI FOR ANY OF THE CHEMICALS IN THE PLANT IS GREATER THAN 3, THE U.S. AREA LOSS PREVENTION MUST BE INVITED TO THE AUDIT.

   E. SAFETY MINIMUM REQUIREMENTS: ARRANGE WITH YOUR SAFETY SUPERINTENDENT TO DO (1) THE EMPLOYEE INTERVIEWS, (2) THE DOCUMENT INSPECTION AND (3) THE PHYSICAL INSPECTION OF YOUR PLANT AT LEAST 2-3 WEEKS BEFORE THE SCHEDULED AUDIT TIME.

   F. ANY OTHER APPLICABLE AUDITS AND INSPECTION MUST ALSO BE SCHEDULED 2-3 WEEKS BEFORE THE CONSOLIDATED AUDIT SO THEY CAN BE REPORTED DURING THE SCHEDULED AUDIT TIME.

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CONSOLIDATED AUDIT GUIDELINE

SUPERINTENDENT/DEPARTMENT HEAD ROLE

5. SCHEDULE AND CONDUCT A PRE-AUDIT MEETING WITH THE LOUISIANA DIVISION AUDIT FACILITATOR ASSIGNED TO YOUR AUDIT. THE ENTIRE PLANT TEAM THAT IS PREPARING FOR THE AUDIT SHOULD ATTEND. THIS MEETING SHOULD OCCUR ABOUT 4 WEEKS BEFORE THE AUDIT.

6. THE LOUISIANA DIVISION AUDIT FACILITATOR AND THE SUPERINTENDENT/DEPARTMENT HEAD MUTUALLY AGREE UPON AND SET THE AGENDA AND SCHEDULE FOR THE CONSOLIDATED AUDIT.

7. THE PLANT TEAM AGREES ON THE AREAS OF DEFICIENCY AND CONCERN IDENTIFIED DURING THE QUESTIONNAIRE PREPARATION AND PREPARES "PRELIMINARY" RECOMMENDATIONS AND IMPLEMENTATION PLANS.

8. ASSIGNMENTS FOR PRESENTATION DURING AUDIT WEEK ARE MADE. THESE SHOULD ADDRESS THE TOPICS ON THE QUESTIONNAIRES ON AN EXCEPTION BASIS. SUGGESTED AGENDAS ARE INCLUDED IN MOST OF THE AUDIT QUESTIONNAIRES.

9. THE COMPLETED QUESTIONNAIRES, ALONG WITH "PRELIMINARY" RECOMMENDATIONS, ARE SENT TO THE AUDIT FACILITATOR AT LEAST 10 CALENDAR DAYS BEFORE THE AUDIT. INCLUDE LOCATION AND TIME FOR EACH AUDIT WITH THE QUESTIONNAIRES.

10. THE SUPERINTENDENT/DEPARTMENT HEAD AND KEY MEMBERS OF HIS PLANT TEAM WILL ATTEND THE ENTIRE AUDIT. SUPERINTENDENT/DEPARTMENT HEAD ATTENDANCE IS MANDATORY.

11. THE TEAM CONCEPT IS ALSO USED TO PREPARE THE IMPLEMENTATION PLANS IN RESPONSE TO THE CONSOLIDATED AUDIT RECOMMENDATIONS WITHIN 30 DAYS OF THE AUDIT.

12. THE SUPERINTENDENT/DEPARTMENT HEAD WILL REVIEW THE IMPLEMENTATION PLANS WITH HIS/HER MAJOR MANAGER (OR SECTION MANAGER). THE MAJOR MANAGER (OR SECTION MANAGER) WILL APPROVE THE RESPONSE AND COMMUNICATE THE RESULTS OF THE AUDIT TO THE DIVISION GENERAL MANAGER.

13. A COPY OF THE APPROVED IMPLEMENTATION PLANS WILL BE SENT TO AUDIT FACILITATOR WITHIN 45 DAYS OF THE AUDIT FOR DISTRIBUTION TO THE OTHER CORE AUDIT TEAM AND THE APPROPRIATE SECTION TO THE FUNCTIONAL AUDIT TEAM LEADER.

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CONSOLIDATED AUDIT GUIDELINE

SUPERINTENDENT/DEPARTMENT HEAD ROLE

14. IN KEEPING WITH THE OSHA STAR PROGRAM, SIX MONTHS AND AGAIN AFTER ONE YEAR FOLLOWING THE AUDIT, THE SUPERINTENDENT/DEPARTMENT HEAD WILL REVIEW THE CONSOLIDATED AUDIT RECOMMENDATIONS AND SEND A STATUS REPORT ON CORRECTIVE ACTIONS TO HIS/HER MAJOR MANAGER, TO SECTION MANAGER, AND TO THE AUDIT FACILITATOR FOR DISTRIBUTION TO THE OTHER CORE AUDIT TEAM MEMBER AND THE APPROPRIATE SECTION TO THE FUNCTIONAL AUDIT TEAM LEADER.

5/20/91