



Shell Oil Company
Interoffice Memorandum

OCTOBER 19, 1988

747.3

HEALTH & SAFETY	
DATE	NAME
10/19/88	C. M. Crawford
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PLAINTIFF'S EXHIBIT

SH-2694

FROM: SR. STAFF ENGINEER, PRODUCTS HEALTH & SAFETY
TO: SEE ATTACHED DISTRIBUTION LIST
SUBJECT: HEALTH & SAFETY COMPLIANCE REVIEW REFERENCE SHEETS

The attached sheets dated March 7, 1988, are the most recent version of the reference used for the Head Office HS&E Health & Safety Compliance Assessment Reviews. The sheets attached have some key thoughts ("memory jobbers") to assist those doing the compliance review. This is a fairly recent addition to the sheets and serves as advance notice of items certain to be examined during formal reviews. In addition, it provides a useful resource for internal compliance audit programs.

Obviously it is not possible to list all possible items to be examined in either an external or internal audit. And, some requirements may not apply to certain locations.

These sheets are provided as a resource for your program. They are intended to be "evergreen" -- which suggests revisions may be coming soon to reflect recent regulatory revisions and additions.

K. C. Crawford
K. C. Crawford

KCC:bjd

Attachment

cc: J. L. Rivard

LAM 011408

BJT8829301

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LAM 011409

TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
INSPECTIONS & REVIEWS		
- Previous Compliance Reviews - Shell - OSHA Citations/Correction - 1903.18 - Other Agencies - Various		Recommendations addressed and corrective actions completed? What is citation history (last 5 years)? Are corrections documented? Any other agency citations in the last 3 years? Corrections documented?
ADMINISTRATIVE		
- Compliance Resources - H&S CAR Manual - Shell - Appropriate Standards - Shell - Own Manuals - Shell - Responsibility Assigned - Shell - OSHA Poster - Injury/Illness Records - BLS 86 Guidelines - BLS - Log & Summary - 1904.2 - Case Reports - 1904.4 - Record Retention - 1904.6 - Fatal/Hosp. Reporting - 1904.8 - Access to Exp/Med Records - 1910.20 - Site Entry Procedures - Shell		Awareness? Available? Where? Responsible person designated? What publications are available? Where? (e.g. OSHA 1910, 1926, DOT, MMS, etc.) Operating procedures, safety manuals, emergency procedures, etc. Used? Who implements new standards, updates procedures? Who is responsible for health & safety regulatory compliance? Are posters visible on "report to work" bulletin boards? Are BLS guidelines available? Is record keeper aware of requirements? Does log conform to new BLS guidelines? Summary posted annually? Are case reports available for recordable injuries? Is five year requirement followed? Aware of OSHA reporting requirements? Posted, or informed annually? New employees advised? Records retained for 30 years or as required by specific regulation? Available? Understood by management and gate/security personnel?
HAZARD COMMUNICATION		
- Written Plan - 1910.1200 - Substance List - MSDS - Labeling - Training - Shipments - Contractors - State RTK Laws		Available? Include "hazard determination" description? Available? Kept up-to-date? Available, current, and ready access by employees? Are containers/equipment/samples labeled? Have employees been trained - initial and upon new hazard? Procedure/labeling? Procedures to inform contractors in place? Do contractors have acceptable hazcom training and procedures in place? Who audits? Does OSHA HCS Program meet state requirements too?

TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>RESPIRATORY PROTECTION</u>		
• Needed • Resp. Protection Manual • Written Plan • Selection & Use • Training • Fit Testing • Respirator Maintenance • Breathing Air Quality • User Medical Status Review • Periodic Evaluation/Survey • Records • Personal Factors	- 1910.134 - Shell - Shell	Are respirators present on site? Are they needed? Why? Available? Used by whom? Responsible person designated? Available? Described in written plan? How accomplished in practice? Done? Documented? Done? Documented? Respirators inspected, maintained, cleaned, stored properly? Checked periodically? Documented? Done? Documented? Is program assessed annually? Are user activities monitored periodically? Are selection, fit testing, training, maintenance documented? In conformity with Shell Respiratory Protection Manual?
<u>HEARING CONSERVATION</u>		
• Needed • Employee Notice • Monitoring Data • Signs/Cortour Maps • Hearing Protection • Training • Audiometric Testing • STS Follow-up	- 1910.95	Any noise sources? Sound levels known to be below the action level? Posted? Levels exceed 85 dBA? Last done when? Employees advised of results? Current? Areas posted? Provided? Worn in posted area? Done? Documented? Done if above 85 dBA? Employees advised of results? Managers advised of STS? Are employees informed? If STS occurs, is employee retrained?
<u>BENZENE</u>		
• Scope/Application • Exposure Monitoring • Regulated Areas • Written Plan • Signs/Labels • Training • Medical Surveillance • Marine	- 1910.1028	Known and documented? Overall plan developed? Initial monitoring completed? Results? Periodic monitoring done? Documented? Established? Requirements followed? Compliance plan developed in writing (when PEL's exceeded)? Requirements followed? Requirements followed? Requirements followed? Apply? Employees protected? Regulated areas established on barges?

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>ASBESTOS</u>		
- Exposure Monitoring - Regulated Areas - Housekeeping - Signs/Labels - Personal Protection - Training - Medical Surveillance - Office Bldg Procedure - General Industry	- 1926.58 Areas/equipment with asbestos identified? Initial monitoring done and documented? Results? Established for "major" and "minor" work? Competent person designated? Adequate? Meet requirements? Requirements met? Protective clothing used when PEL exceeded? Completed? Documented? Requirements met? Aware of and follow procedure where applicable? - Shell - 1910.1001 Brake work done? Requirements of standard followed? - 1910.1025 Comply with standard? - 1910.1017 Comply with standard? - 1910.1047 Comply with standard? - 1910.1000 Aware of and comply with PEL's?	
<u>OTHER OSHA SUBSTANCE STANDARDS</u>		
- Lead - Vinyl Chloride - Ethylene Oxide - Other Toxics		
<u>INTERNAL STANDARDS</u>		
(CCL ₄ , ECH, EDB, DD, Alpha Olefins, CS ₂ , 2 butoxyethanol, 2 ethoxyethanol, 2 ethoxyethylacetate, 2 methoxyethanol, EO, CHCl ₃ , Radiation, nickel chloride, nickel oxide, nickel sulfide)	- Shell Aware of and comply with Shell Internal Standards?	
<u>INDUSTRIAL HYGIENE MONITORING</u>		
- HS&E Monitoring Proced. - Strategy - Results	- Shell Aware of HS&E procedure? Monitoring strategy developed? Results evaluated and provided to employees?	
<u>VENTILATION REQUIREMENTS</u>		
- Ventilation Manual - Area or Room - Laboratory Hoods - Local Exhaust Systems	- 1910.94 Used where? OSHA requirements (grinding, spraying, open surface tanks) met? Ventilation manual available and used? Responsible person designated? Ventilation adequate? Periodically tested? Documented? Ventilation adequate? Periodically tested? Documented? Systems adequate? Periodically tested? Documented? - Shell - Shell - Shell - Shell	

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>HAZARDOUS WASTES</u>		
- Scope/Application - Compliance Plan - RCRA Operation (Para. o) - Emergency Response - Training	- 1910.120	Known and documented? Compliance plan developed and documented? RCRA permitted hazardous waste operation? Comply? Emergency response? Comply? Training completed and documented?
<u>WORK AUTHORIZATION SYSTEMS</u>		
- Lockout/Tagout - Hot Work - Confined Space Entry - Accident Prev. Signs/Tags	- Shell - Shell - Shell - 1910.145	Lock out/tag out procedure in place - mechanical, electrical? Procedure for authorizing hot work? Procedure for authorizing confined space entry? Tags conform?
<u>CONTRACTOR SAFETY/HEALTH</u>		
Program Assessment	- Shell	Description of program in place? Effective?
<u>INTERNAL SELF-AUDITS</u>		
Program Assessment	- Shell	System in place? What covered (press vessels, PRV's cranes/hoists, vehicles, small tools, etc.)? Follow-up?
<u>SHELL GUIDELINES/POLICIES</u>		
- Embryo-Fetus - Video Display Terminals (VDT) - Vehicular Safety Procedures - Seat Belts - Personal Flotation Devices - Lead/Chromate removal - Accident investigation - NFPA 30 tank overfill	- Shell	Aware of policy? Materials present? Female employees? Implemented? Aware of and follow guidelines? Users exceed 4 hours/day? Vehicle safety program? Aware of/follow Shell Drivers Handbook? Aware of Guideline? Enforced? Aware of Guideline? PFD's needed? Available? Used? Aware of guideline? Followed? Accident investigation system in place? Describe. Bulk tanks? Aware of requirements? Comply?

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>PROCESS SAFETY</u>		
• OSHA SSE		Knowledgeable of OSHA SSE? Screening presentation pre-planned?
• NJ TCPA	- OSHA	New Jersey locations knowledgeable? Compliance plan in place?
• CA AB2185/3777	- NJ	California locations knowledgeable? Compliance plan in place?
	- CA	
<u>OTHER PERSONAL PROTECTIVE EQUIPMENT*</u>		
• Eye & Face Protection	- 1910.133	(Must meet applicable ANSI standard.) Made available when eye/face injury possible? Worn as required?
• Head Protection	- 1910.135	Made available when head injury possible? Worn as required?
• Foot Protection	- 1910.136	Made available where foot injury possible? Worn as required?
• Other (Gloves, etc.)	- 1910.132	Made available when hand/skin injury possible? Worn as required?
<u>PRESSURE RELIEF VALVES</u>		
• Audit System	- 1910.100(b)	Are PRV's tested periodically? How often?
• Documentation		Documented? Follow-up procedure?
<u>ABRASIVE BLASTING</u>		
• Silica	- 1910.244	Nozzle have fail-closed manual valve? Ventilation requirements met?
	- 1910.1000	Comply with PEL for silica if sand used?
<u>NON-IONIZING RADIATION</u>		
• Electromagnetic	- 1910.97	Comply with standard?
• Lasers	- State	Any state requirements? Comply?
<u>MEDICAL SERVICES/FIRST AID</u>		
• First Aid & CPR Training	- 1910.151	Training done? All shifts covered? Refresher training provided?
• Documentation of Training		Training documented?
• F/A Supplies/Equipment		Available? Maintained?
• Eyewash/Shower Facil.		Available? Tested periodically? Documented?
<u>EMPLOYEE EGRESS</u>		
• Exit signs/maps	(Subpart E)	Exits - adequate, identified, unobstructed, illuminated? Fire detection, alarm, sprinkler systems inspected and maintained? Emergency lighting
• Written Plan Needed	- 1910.38	Written plan needed? Adequate?
<u>FIRE PROTECTION</u>		
• Fire Brigade	(Subpart L)	Applicable? Written organization statement? Physical capability established?
• Training		Brigade members trained? Employees trained on use of fire extinguishers?
• Equipment Audits		Extinguishers inspected monthly and maintained annually?
• Documentation		Training, equipment inspection, physical capability documented?

TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>WALKING/WORKING SURFACES</u>	(Subpart D)	Housekeeping adequate? Openings protected? Floor loading posted? Open sided floors, platforms have railings, toe boards?/Stair tread in good condition? Stair railings?/Ladders in good condition? Inspected regularly? Tied off?/ Scaffolds in good condition? Railings and toe boards? Safety belts used?
<u>FORK TRUCKS</u>	- 1910.178	
• Operator Training		All operators trained? Periodic refresher training?
• Documentation		Training documented?
<u>CRANES & HOISTS</u>	- 1910.179	
• Inspections		Inspected according to OSHA requirements? All inspected?
• Certification/Documentation		Inspections documented? Cranes certified?
• Rated Load Marking		Rated load marked on crane?
<u>MACHINE GUARDING</u>	(Subpart O)	Moving equipment guarded? 1/8" clearance on grinders? Auto start equipment posted?
<u>WELDING</u>	- Shell	Awareness of manual? Responsible person designated?
• Welding Manual	- 1910.252	Ventilation meet requirements?
• Ventilation	- 1910.252	Electrical arc welders for grounding, etc.? Condition of leads ok?
• Certification	(Subpart H)	
<u>HAZARDOUS MATERIALS</u>		
• Compressed Gas		Cylinders secured? Pressure relief device maintained?
• Flammable Liquids		Flammables stored properly? Adequate fire control equipment? Ignition sources controlled? Grounding adequate?
<u>MATERIALS HANDLING</u>	(Subpart N)	
• Aisles/Housekeeping		Aisle adequate and clear? Housekeeping good?
• Elevated Storage		Elevated storage racks in good condition? Allowed loadings known and posted?
• Railroad Cars		
<u>ELECTRICAL SAFETY</u>	(Subpart S)	
• Labeling		Circuit boxes, electric panels labelled?
• Grounding		Equipment grounded? Grounding tested?
• Access		

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>MARINE TERMINALS</u>		
<u>LONGSHORING</u>	- 1917	Apply? See specific guidance letter.
	- 1918	Apply?
<u>DOT REQUIREMENTS 49 CFR</u>		
• Hazardous Material Manual	- Shell	Manual being followed? Employees trained? Training documented? Haz material tariff available?
• Rail car unloading/loading		Cars inspected before loading? Flammables grounded properly? Grounding screw clamps operable?
- inspection		Cars properly placarded? Label or MSDS for Hazcom?
- bill of lading/placards		Used when cars loading/unloading.
- blue flags/derailers		
- car inspections documented		
• Truck unloading/loading		Inspected prior to loading? Documentation? Flammables grounded?
- inspection		Truck properly placarded? Label or MSDS for Hazcom?
- bill of lading/placards		Brakes set and wheels blocked? Truck attended during loading/unloading?
- Other		Truck meet DOT noise regulations?
• Driver qualifications		Drivers qualified - physical exam (2 years), annual review of driving record? Aware of new DOT requirements? Single state drivers license?
• Pipeline records		Pipelines regularly inspected? Leak reports filed? Emergency procedure available? Public warning signs exist? Public education programs?
<u>USCG REQUIREMENTS</u>		
• Artificial islands	33 CFR	Approved manual available? USCG approval available? Employees trained?
• Vessels/MODU	46 CFR	Available?
• Waterfront facilities	33 CFR	Done? Documented?
- Operations Manual		Done prior to cargo transfer? Documented?
- Hot Work Permit		Life protection devices available? In good repair?
- Hose Pressure Tests		Cargo hoists inspected? Documented? Emergency response procedures?
- Vessel Inspection		Training? Communication system between vessel, dock and tank farm available?
- Life Saving Devices		
- Other		

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>MMS REQUIREMENTS 30 CFR</u> • Outer Continental Shelf Orders	Questions in Compliance Manual.	
<u>BLM REQUIREMENTS 43 CFR</u> • Onshore Orders • H ₂ S contingency plan	Questions in Compliance Manual.	
<u>ATF REQUIREMENTS 27 CFR</u> • Alcohol • Explosives	Questions in Compliance Manual.	
<u>FAA REQUIREMENTS 14 CFR</u> • Pilot certification • Aircraft certification • Maintenance Certification	Questions in Compliance Manual.	
<u>NRC REQUIREMENTS 10 CFR</u> • License • State Regulations • Training • Inventory Control • Monitoring • Contractor	Licensed facility? License current? State regulations being followed? Users properly trained? Sources properly identified? Inventory control in place & working? Monitoring conducted? Results provided to employees? Contractors comply with regulations? Properly control sources?	
<u>STATE & LOCAL</u> • Boiler Inspection Cert. • Boiler Operator License • Water Heaters • Elevator Inspection Cert. • Food Handling Cert. • Emergency Plan	Inspection required? Up-to-date? Operator licensing required? Up-to-date? Pressure relief valve? Required? Up-to-date? Required? Up-to-date? Meet local requirements?	
<u>MISCELLANEOUS</u> • Air Receivers • Compressed Air Cleaning • Food in Workplace	- 1910.169 All requirements met, including need for PRV? - 1910.242 Aware of OSHA requirements? 30 psi criteria met? - 1910.141(g) Any food/beverages allowed in areas where toxic materials are handled?	

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