File
LaPorte

INTEROFFICE MEMORANDUM

DATE: August 29, 1996

TO: Herm Waltemate

FROM: Bill Lesko/Safety

RE: EPA Clean Air Act - RMP Rule
OSHA 1910.119 PSM-Audit Status

CC: Tim Manning, David Hinson, Ed Beeler, Jim Lewis, John Gressler

Norm,

We received your memo dated 8/16/96 concerning the EPA RMP rule and OSHA 1910.119 self-audit status. Regarding the EPA RMP rule, we have been following the progress of the legislation and intend to fully comply. We believe our worst case flammable scenario involves vinyl chloride, while our worst case toxic scenario will most probably be Anhydrous HCL (chlorine will probably make most probable toxic scenario).

I will act as the facility's qualified person with overall responsibility for the development of the risk management program elements. However, I will work closely with David Hinson and Kathy Cameron to ensure all applicable environmental regulations and TNRCC requirements are met. In addition, the LaPorte Plant is involved with efforts by the Texas Chemical Council (TCC) and East Harris County Manufacturer's Association (EHCMA) to develop consistent scenario development and analysis protocols from plant to plant. This will help ensure that two different plants owned by two companies report semilar worst case scenarios and consequences for similar scenarios such as a chlorine rail car rupture.

Regarding the PSM audit opportunities, the following table indicates progress in the following items:

Number	Description	Status
A9401	Graphically illustrate PSM areas	[redacted] Drawing posted
A9402	Develop a list of PSM chemicals in storage and process	[redacted] part of plant's Hazcom procedure
A9403	Develop a list of PSM materials, location	[redacted]
EP9404	Develop written employee participation procedure	[redacted]
PSI9405	Develop index for information system to ensure all required dates	[redacted]

	in a file	
PHA9406	Revise the plant's PHA schedule and identify rationale for priority	PHA's are scheduled according to risk and plant is on target for completion by deadline IP
PH9407	PHA's must address facility siting and human factors complete with appropriate documentation	PHA's each address human factors. Facility siting will be addressed in a separate HAZOP per API RP 750 IP
PHA9408	Develop system to track recommendations to completion. Communicate resolutions to appropriate people that work in the PSM area.	[redacted] uses Corrective Action System
PHA9409	Review incident reports involving area to be HAZOP'd. Document a part of individual HAZOP	In progress IP
PHA9410	Develop biography profile on each HAZOP team member. Include profile as part of individual HAZOP file	[redacted]
PHA9411	Include as documentation the specific standard or code being considered which conducting PHA's	[redacted] appropriate
OP9412	Establish a system to certify annually that operating procedures are current and accurate and reflect existing proccess technology	[redacted]
OP9413	Complete revision to plant operating procedures to include consequence of deviation and safety system	[redacted]
C9414	Evaluate the system used to verify that truck driver who enter the planty have current safety orientation status	[redacted]
C9415	Implement a post safety evaluation system (form) for contractors who work at plant	[redacted]
PSSR9416	Document pre-start up safety review and file with PHA's a sure job	[redacted]
MI9417	Prepare a written mechanical integrity procedure to comply with 1910.119(j)	[redacted] except PSSR's filed separately or with MOC's as appropriated.
MI9418	Initiate a formal inspection protocol to assure materials and equipment	[redacted]

	are received as ordered	
MI9419	Verify compliance with OSHA's 1910.111 storage and handling of anhydrous ammonia standard. Take corrective action to resolve under insulation external corrosive on piping	Ongoing. We do have an expanded under insulation corrosion program and are planning to audit the ammonia storage areas in 1996. IP
MOC9420	Fully implement the Management of Change Policy, trace for understranding and document being the same	[redacted]
II9421	Develop a system to bring to closure all safety-environmental incidents that occur in a PSM area. Document this closure action in the PSM file	[redacted]art of ISO Corrective Action System
EPR9422	Publish evacuation routes in areas indicating directions to the two plant assembly points	[redacted]marked with flags, [redacted] and visitors given booklets with maps showing rally points
TS9423	Verify secrecy agreements for contractors who are in sensitive areas of the plant	[redacted]

I hope this memo answers any questions you may have. If you need any additional information, please don't hesitate to call.

Bill Lesko

BL/pb

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4 IP