

June 2, 1992

TO: JIM SCHONAERTS

LAPORTE

FROM:

CLEVELAND

8/20/92  
4 C  
6 EP  
3 Inc

LaPorte Plant Safety Audit  
May 4-8, 1992

Attached is the final report of the Safety Audit conducted at the LaPorte plant.

In the following chart, I have compared the LaPorte plant recordable and lost-time incidence rates with BLS Chemical and Allied Products, the CMA rates, and BFG Geon Vinyl Division rates.

|                 | <u>BLS</u> | <u>CMA</u> | <u>BFG<br/>GVD</u> | <u>LAPORTE</u> |
|-----------------|------------|------------|--------------------|----------------|
| <u>1989</u>     |            |            |                    |                |
| Rec. IR         | 6.40       | 3.87       | 3.86               | 5.26           |
| Lost Time IR    | 3.00       | .66        | .92                | .48            |
| <u>1990</u>     |            |            |                    |                |
| Rec. IR         | 5.90       | 3.61       | 3.23               | 1.01           |
| Lost Time IR    | 2.90       | .61        | .34                | 0              |
| <u>1991</u>     |            |            |                    |                |
| Rec. IR         | *          | 3.20       | 2.26               | 4.92           |
| Lost Time IR    | *          | .63        | .26                | .45            |
| <u>1992 YTD</u> |            |            |                    |                |
| Rec. IR         | *          | *          | 1.69               | 0              |
| Lost Time IR    | *          | *          | .08                | 0              |

\* Not Available

The LaPorte plant was rated with 3 items - Needs Attention and 38 items Satisfactory. The report format is laid out for you to write in your abatement program and indicate the status as Completed, In-Progress, or Incomplete. A progress report giving the status of the items requiring attention is due [REDACTED] 2 and each quarter thereafter until all items have been corrected. For your convenience, I have included the word processing disc on which you can enter your response.

NGC 12298

The report includes the following:

- I. Positive Observations
- II. 1990 Previous Items to be Corrected
- III. 1992 Items which Need to be Corrected
- IV. Plant Inspection Tour
- V. House Keeping Evaluation
- VI. Plant Safety Audit Rating

  
H. Waltemate

HW/JS  
audLaPor.hw

cc: C. J. Nosal  
R. Grahek/M. Marshall  
E. Martinelli/W. Patient  
C. Mattia  
S. Williams

**LAPORTE PLANT  
SAFETY AUDIT  
MAY 4-8, 1992**

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**I. Positive Observations**

1. During my plant inspection tour of the VCM cracking/purification/tank farm area, I was favorably impressed. The internal plant audits are effective in these areas.
2. The revised operating procedures, which I skimmed, appear to be well done. You need to verify that they meet all the requirements of OSHA Standard 1910.119(f).
3. The wearing of hard hats and safety glasses with side shields was excellent plantwide. I did not observe any violations during my plant inspection except as noted in "Items to Correct" 1992-7(ii).
4. The B&R tool room is still being maintained at a high standard as indicated in 1990 report.

LAPORTE PLANT  
SAFETY AUDIT  
MAY 4-8, 1992

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II. 1990 Previous Items to be Corrected

1990-3      Several problems were found throughout the plant with regard to electrical. Thirty-eight of the individual items listed in the plant inspection tour involved electrical. The following areas need to be addressed:

1.      The hazardous area classifications of the plant need to be reviewed and revised as needed. In my opinion, the only Division 1 areas in the plant are inside the sumps and pits. The Oxychlorination Process Area needs to be Classified Class I, Group C & D, Division 2. Also, the operator shelters which contain non-explosion proof equipment should be relocated or defined as outside of a hazardous area. I have discussed the electrical classification of areas with Paul Gaydos and he agrees with my position.
2.      Numerous problems were noted with seals not being poured, conduit covers missing, plugs/drains missing and circuits not identified.

COMMENT:      The plant hazardous area classification was revised. The sketch made, reflects the requirement for type of electrical equipment to be installed in the various areas. Another sketch which reflects the NFPA hazard classification needs to be prepared.

The operator shelters remain unchanged and need to be addressed.

Electrical seals not poured, were again found during the plant inspection.

**Plant  
Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

1990-5 OSHA Standard 1910.147 Lockout/Tagout section (c)(6) also has several requirements on periodic inspection. You need to review this section and comply with the requirements. Also, records need to be maintained on all lockout training and inspections.

**COMMENT:** You need to proceed to setup an audit system for lockout as required by 1910.147. Also refer to 1992-2, Items to be Corrected.

**Plant  
Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

1990-7 During the plant inspection, it was found that safety equipment was not being inspected as required on a monthly basis; this included fire extinguishers, Scott Air Paks, escape respirators, eyebaths and safety showers.

You need to establish a system which assures that safety equipment is being inspected on a monthly basis.

**COMMENT:** Fire extinguishes are still not being inspected monthly in several areas.

**Plant**  
**Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

1990-10 A new GVD procedure has been issued which requires prompt reporting of emergency events. This procedure was sent to J. Schonaerts on December 12, 1989, by R. J. Grahek. The procedure describes in detail which events are to be reported within a specific time frame and who must be notified.

You need to develop within your plant a site-specific notification procedure which complies with these requirements.

**COMMENTS:** A procedure specific for the LaPorte plant needs to be prepared.

**Plant**  
**Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

1990-13 Noncompliance with OSHA standards was observed during the plant inspection. Each of the individual problems were listed in Section III Inspection Tour. The following is a list of the OSHA standards involved. I have also indicated the sections that were pointed out in my inspection in 1988.

- 1910.23(a)(2) Ladder without gate (1988)
- 1910.24(e)(6) Insufficient handrail clearance
- 1910.37(k)(2) Exit blocked (1988)
- 1910.37(q)(1) Exit not marked (1988)
- 1910.157(c)(1) Fire extinguisher not accessible-mounted
- 1910.157(c)(4) Fire extinguisher not in ready condition
- 1910.157(e)(2) Monthly inspection of fire extinguishes
- 1910.219(m)(1)(i) Coupling guard not secured
- 1910.303(b)(2)(i) Open breaker panel (1988)
- 1910.303(f) Circuits not identified
- 1910.307(b)(3) Seals not poured (1988)

A complete inspection needs to be made of the plant and each of the problems pointed out should be corrected.

COMMENT: These items were again found during the plant inspection. Refer to section IV Plant Inspection Tour.

**Plant**  
**Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

**LAPORTE PLANT  
SAFETY AUDIT  
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**III. 1992 Items to be Corrected**

1992-1      During the plant inspection, we observed a crawler backhoe being used with the construction project. It was located near the maintenance office exit. Two individuals were directing people away from the swing radius of the rear of the rotating superstructure. This operation was shutdown upon our instruction.

It is a requirement of 1926.550(a)(9) the swing radius be barricaded in such a manner to prevent a person from being struck or crushed.

A system for requiring outside contractors to comply with OSHA requirements needs to be implemented.

**Plant  
Response**

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**Status**

\_\_\_\_\_ Completed      \_\_\_\_\_ In-Progress      \_\_\_\_\_ Incomplete

1992-2      The compliance with the BFG Cardinal Rules and Equipment Isolation was included in this audit. The following need to be addressed.

- Confined space entry into a pit was not provided with continuous oxygen monitoring. The B&R craftsman involved in the pit entry was not aware of the requirement for continuous oxygen monitoring during all confined space entry.

- A class III Hot Work Permit for vehicle entry was issued without the LEL results recorded on the permit.
- B&R craftsmen were working on a steam line without individual lockout locks or tags on the isolation valve.
- An audit system with documentation to assure compliance is not in place.
- The plant SA-8 Equipment Isolation procedure allows a cable-type tie in place of a locking device with individual control.
- Confined spaces in the plant such as the fire water pit and the 5-foot dike on "B" Tar Tank need to be defined and specific entry safeguards established.

**Plant  
Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

1992-3      On February 24, 1992 OSHA issued the OSHA 1910.119 Standard - Process Safety Management of Highly Hazardous Chemicals. The purpose of this standard is the prevention of catastrophic incidents involving chemical releases.

The following subjects are included in this standard and must be implemented by the dates indicated:

- Application/scope - (May 26, 1992)
- Employee participation (May 26, 1993)
- Process safety information (with PHA)
- Process Hazard Analysis
  - i) Preliminary Hazard Evaluation (Dec 31, 1992)

- ii) 25% of operations (May 26, 1994)
- iii) 50% of operations (May 26, 1995)
- iv) 75% of operations (May 26, 1996)
- v) 100% of operations (May 26, 1997)
- vi) Revalidate every five years

- Operating procedures (August 26, 1992)
- Training (May 26, 1993)
- Contractors (May 26, 1992)
- Pre-startup safety review (May 26, 1992)
- Mechanical integrity (August 26, 1992)
- Hot Work Permit (May 26, 1992)
- Management of change (August 26, 1992)
- Incident investigation (May 26, 1993)
- Emergency planning and response
  - i) 1910.38(a) Emergency Plan (May 26, 1992)
  - ii) 1910.120(q) HAZWOPER (May 26, 1992)
- Compliance audits (May 26, 1995)

By May 26, 1992 you need to formally assess the applicability and compliance status of this standard. The following needs to be completed:

- 1) List all areas (process and operations) covered and the management person responsible.
- 2) List areas not covered and the rational for excluding.
- 3) Evaluate the degree of compliance with each specific requirement
- 4) Develop and indicate a strategy which will result in compliance.

**Plant  
Response**

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**Status**

\_\_\_\_\_ Completed \_\_\_\_\_ In-Progress \_\_\_\_\_ Incomplete

1992-4

With some of the recent major fires and explosions, the importance of a safe exit from the workplace is brought out. All of your exits need to be properly identified. Each of your fence line gates need to be marked as an exit, emergency exit or not an exit. The gates on the S.E., East and S.W. fence line need to be unimpeded exits and the others should be provided with a key under glass for emergency situations. The fence line exits and their function need to be included in your plant evacuation procedure.

**Plant  
Response**

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**Status**

\_\_\_\_ Completed \_\_\_\_ In-Progress \_\_\_\_ Incomplete

1992-5

A written safety procedure on the resetting of tripped electrical breakers needs to be prepared. Only qualified personnel should be allowed to reset a tripped electrical breaker.

I left a copy of the Calvert City Safety procedure which you can use as a guide.

**Plant  
Response**

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**Status**

\_\_\_\_ Completed \_\_\_\_ In-Progress \_\_\_\_ Incomplete

1992-6      The plant has recently revised the Cardinal Safety procedures, Equipment Isolation, Contractor Safety and others. In reviewing the safety manuals in the operator shelters the current safety procedures had not been inserted.

You need to establish a system to update all of these plant safety manuals and maintain them with the current procedures.

**Plant  
Response**

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**Status**

\_\_\_\_\_ Completed      \_\_\_\_\_ In-Progress      \_\_\_\_\_ Incomplete

1992-7      The following need to be addressed with regard to personal protective equipment:

- i)      Safety shoes are not worn in the laboratory. GVD SA-124 Protective Footwear requires safety shoes to be worn by individuals performing work in process, laboratory and maintenance areas.
- ii)     Eye protection is not required by the plant in the Engineering stores. GVD SA-121, Eye Protection requires safety glasses to be worn throughout the plant with the following exceptions:
  - Offices
  - Lunch or break rooms
  - Control rooms
  - To and from the plant entry gate and locker-room or office, provided open roadways are used and it is at the start or end of the individual's work shift
  - Open walkways specifically designated and identified by the facility as "safe walk-ways"

- iii) Employees engaged in hazardous operations shall be provided and required to wear protective garments to prevent skin contact with liquid vinyl chloride.

**Plant  
Response**

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**Status**

\_\_\_\_ Completed \_\_\_\_ In-Progress \_\_\_\_ Incomplete

1992-8

CMA has recently issued under Responsible CARE, the Health and Safety Code. You need to determine the present plant status in meeting these Health and Safety Codes and work toward compliance.

**Plant  
Response**

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**Status**

\_\_\_\_ Completed \_\_\_\_ In-Progress \_\_\_\_ Incomplete

**LAPORTE PLANT  
SAFETY AUDIT  
MAY 4-8, 1992**

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**IV. Plant Inspection Tour**

1. Electrical breaker box (120 VAC Dist) in the Analyzer Building with five openings covered with tape. Metal covers need to be installed. Refer to OSHA Std. 1910.303(b)(2)(i).
2. Three electrical seals were noted in the area which were not poured. Refer to OSHA Standard 1910.307(b)(3).
3. Air sparger line to "A" Reactor was replaced but the line was not insulated. This should be corrected before the equipment is started-up.
4. The coupling guards on the two "B" reactor coolant pumps are not secured. Also the coupling guard on the "A" reactor Lube Oil pump is too flimsy. Refer to OSHA Std. 1910.219(m)(1)(i).
5. The two doors on the second level of the Delaval Building needs to have exit signs. Refer to OSHA Std. 1910.37(q)(1).
6. Three electrical breaker panels in the Oxy Tank Farm had not identified each of the individual circuits. Twenty-two appeared to be in service without identification. Refer to OSHA Std. 1910.303(f).
7. Eight fire extinguishers were noted in the Oxy Tank Farm which had not been inspected as required. Refer to OSHA Std. 1910.157(e)(2).
8. Platform grating in the Oxy Tank Farm was secured with wire instead of the required saddle clips.
9. The pump pad in the Oxy Tank Farm has standing water. Drainage needs to be provided.
10. The 3' valve on the bottom of the Light Ends Storage Tank FB 6402 should be closed instead of the two small valves.
11. Continuous oxygen monitoring was not provided for entry into a pit. The B&R employees involved in the entry were not aware that continuous oxygen monitoring is required.

12. Operator was observed in the Incinerator Area without the required hearing protection. Refer to OSHA Std. 1910.95(b)(1).
13. A determination needs to be made if a confined space entry permit is required for entering the dike of Tars Tank "B". The concrete dike is six foot high.
14. Housekeeping 6 - Meets Requirements.

#### EDC Area

1. A Class III hot work permit was written for vehicle entry and no LEL level was written on the permit. The operator stated he performed the LEL test but failed to note it on the permit.
2. The Safety Procedures in the Operator's Building are not current. Most are dated 1986.
3. Electrical breakers 6 & 8 in the HTC Vent Analyzer Building are not labeled. Refer to OSHA Std. 1910.303(f).
4. Electrical seal not poured on a switch on the Light Ends Column. Refer to OSHA Std. 1910.307(b)(3).
5. Instrument wiring to a load transmitter is secured to the ladder cage. Nothing should be attached to a ladder cage.
6. Blasting sand was noted in 100 pound bags. It should be a plant requirement to have two men handle these 100 pound bags.
7. The 1 1/2" - 3" required clearance on hand rails is not provided at the HTC Column overhead condenser upper level deck. Refer to OSHA Std.. 1910.24(e)(6).
8. The EDC Storage tanks are not identified as EDC and only one has the NFPA Diamond hazard warning. Refer to OSHA Std. 1910.1200(f)(4) on one tank.
9. Housekeeping 7 - Exceeds requirements.

#### Dock

1. Three fixed ladders on the dock need to be provided with gates. Refer to OSHA Std. 1910.23(a)(2).

2. The electrical adapter (pigtail) in the Operator's shelter needs to be removed.

#### Utilities & Waste Water

1. Relief valve PSV 1094 on the steam turbine has a tag on it which states it was due for inspection 11/13/91.
2. Explosion proof housing on the Air Dryer has only one bolt in place. Several are required. Refer to OSHA Std. 1910.307(b)(3).
3. Several fixed ladders in the Utilities/Waste Water Area need to be provided with a self closing gate. Refer to OSHA Std. 1910.23(a)(2).
  - 3 on platforms at Air Receiver
  - Brine tank FB 8014
  - Several on top of Cooling Tower
  - Two on spray cooling towers
  - Three at surge drum
4. Box for baking soda should be filled or the box removed.
5. Broken light globe near Cooling Tower.
6. Seal missing on Fire Extinguisher E13. Refer to OSHA Std. 1910.157(c)(4).
7. Fixed ladder with the bottom having a reverse angle. Refer to OSHA 1910.28(e)(4).
8. Electrical outlet has come loose from handrail.
9. The electrical adapter (pigtail) should be removed from 001 outfall shelter.
10. Cover missing on electrical box on the "hockey chopper". Refer to OSHA Std. 1910.305(b)(2).
11. Lub oil can on top of "hockey chopper" needs to be labeled. Refer to OSHA Std. 1910.1200(f)(4).
12. The boxes on top of the Cooling Tower should be labeled "Escape Respirator".
13. Two B & R pipefitters were working on a steam line without having their lockout lock in place. Refer to OSHA Std. 1910.147(a)(2)(i).
14. The coupling guard is loose on secondary pump GA 4841A. Refer to OSHA 1910.219(m)(1)(i).

15. Exit signs need to be provided on both doors on the second level of the Filter Building. Refer to OSHA Std. 1910.37(q)(1).
16. All the breakers in IP-2 are not identified. Refer to OSHA Std. 1910.303(f).
17. The operating procedures need to be updated. Refer to OSHA Std. 1910.119(f).
18. Housekeeping 5 - Meets requirements.

#### VCM Cracking/Purification/Tank Farm

1. Stair tread on C-3 furnace is bent and needs to be repaired. Refer to OSHA Std. 1910.24(f).
2. The coupling guard is loose on the Quench Column Reflux Pump. Refer to OSHA Std. 1910.219(m)(1)(i).
3. The breakers LP-1C in Switch House #2 are not identified. Refer to OSHA Std. 1910.303(f).
4. The belts on the 3 low pressure vent blowers need to be guarded on the inside.
5. The fixed ladder on the HCI Stripper Column needs a gate to replace the chain. Refer to OSHA Std. 1910.23(a)(2).
6. Operator access needs to be provided to the feed valves on the furnaces. Suggest the existing platform be extended.
7. Fire extinguisher G18 was not inspected in April. Refer to OSHA Std. 1910.157(e)(2).
8. Electrical cord at the VCM scale needs to be returned to storage.
9. The pulley guard on the air conditioner of the VCM Loading shelter needs repair. Refer to OSHA 1910.219(d)(1).
10. Housekeeping 8 - Exceeds requirements.

#### Engineering Stores

1. Fire extinguishers are not being inspected on a monthly basis. Refer to OSHA Std. 1910.157(e)(2).

2. The egress outside is partially blocked with a pallet of metal. Refer to OSHA Std. 1910.37(g)(4).
3. Safety glasses with sideshields need to be required.
4. Fire extinguisher on floor needs to be mounted or removed. Refer to OSHA Std. 1910.157(c)(1).
5. The metal box on the extension cord in the tool room needs to be replaced with a female outlet designed for that purpose. Refer to OSHA Std. 1910.303(b)(2).
6. Housekeeping 7 - Exceeds requirements.

#### Shop Area

1. The electrical box on the floor for the power supply to grinder needs to be protected.
2. Two fire extinguishers were partially block. Refer to OSHA Std. 1910.157(c)(1).
3. Outside vendor was observed in the shop without the required eye protection.
4. Oil drum leaking onto the floor. Refer to OSHA Std. 1910.22(a)(1)&(2).
5. Extension ladder noted with a defective shoe. Refer to OSHA Std. 1910.25(d)(iv).
6. Housekeeping in the area of the sandblaster needs attention.
7. The CO<sub>2</sub> fire extinguisher needs to be mounted or properly stored. Refer to OSHA Std. 1910.157(c)(1).
8. A safety shower and eye wash needs to be provided at the pad near the Alpha Chem Tank. Refer to OSHA Std. 1910.151(c).
9. Housekeeping 5 - Meets requirements.

#### Laboratory

1. Safety shoes need to be worn in this area.
2. Egress door is partially blocked with a refrigerator. The minimum width required is 28". Refer to OSHA Std. 1910.37(f)(6).

3. Housekeeping 7 - Exceeds requirements.

#### Capital Building

1. Three individuals were observed without eye protection.
2. Blasting sand was in 100 pound bags and cement in 94 pound bags. This material should be purchased in 55 pound or less bags, or it should be a requirement that 2 people handle.
3. Fire extinguishers are not being inspected monthly as required. Refer to OSHA Std. 1910.157(e)(2).

#### Catalyst Warehouse

1. Two fire extinguishers and the fire alarm pull station were blocked. Refer to OSHA Std. 1910.157(c)(1) & .165(e).
2. Fire extinguishers are not being inspected monthly as required. Refer to OSHA 1910.157(e)(2).
3. The empty catalyst super sacks need proper storage.

#### Fab Area

1. Fire extinguishers are not being inspected monthly. Refer to OSHA 1910.157(e)(2).
2. Discharged fire extinguishers were noted. Refer to OSHA Std. 1910.157(c)(4).
3. Fire extinguishers were noted blocked and not mounted as required. Refer to OSHA 1910.157(c)(1).
4. Eye wash was blocked.
5. Exhaust fan needs to be guarded. Refer to OSHA 1910.212(a)(5).
6. A portable grinder was being used while hold the pipe in the other hand. The material being worked on must be secured in a vise.
7. Arc welding was being done without the required screens. Refer to OSHA 1910.252(b)(2)(iii).

8. Electrical cords with metal boxes need to be replaced with the proper female outlets. Refer to OSHA 1910.303(b)(2).
9. The chains on the ladder and access should be removed as gates have been provided.
10. Housekeeping 4 - Meets requirements.

LAPORTE SAFETY AUDIT  
1992

V. HOUSEKEEPING EVALUATION

|                                           |                        |
|-------------------------------------------|------------------------|
| • VCM Cracking/Purification/<br>Tank Farm | 8 Exceeds Requirements |
| • EDC Area                                | 7 Exceeds Requirements |
| • Engineering Stores                      | 7 Exceeds Requirements |
| • Laboratory                              | 7 Exceeds Requirements |
| • Oxy Area                                | 6 Meets Requirements   |
| • Utilities/Waste Water                   | 5 Meets Requirements   |
| • Main Shops                              | 5 Meets Requirements   |
| • B & R Shops                             | 4 Meets Requirements   |

VI. - BFGOODRICH CHEMICAL SAFETY PROGRAM RATING

LOCATION: LaPorte Plant      DATE OF AUDIT:    May 4-8, 1992

RATING      ORGANIZATION AND ADMINISTRATION

S      Management and Supervision Involvement  
NA      Compliance with Previous Audits (Refer to 1990-3, 1990-5, 1990-7, 1990-10 & 1990-13)  
S      Preparation and Compliance with Job Procedures  
S      Procurement and Introduction of New Chemicals and Equipment  
NA      Compliance with OSHA Standards (Refer to 1990-5, 1990-7, 1990-13, & 1992-1)

EDUCATION, TRAINING AND MOTIVATION

S      Contractor Training  
S      Safety Counseling  
S      Accident Prevention Achievement Recognition  
S      Fire Preparedness  
S      Supervisor Training  
S      Employee Safety Training  
S      Hot Work Training  
S      Lockout Training  
S      Vessel Entry Training  
S      Forklift Trailer Entry Training  
S      New Employee Indoctrination  
S      Safety Meetings  
S      First Aid  
S      Off-The-Job Safety

GENERAL HAZARD CONTROL

S      Quality of Housekeeping Program  
S      Housekeeping Conditions  
S      ~~Internal~~ Personal Safety Audit  
S      Equipment Guarding  
S      Safety Equipment  
S      Hoisting Equipment  
S      Electrical Equipment  
S      Drum Handling System  
S      Forklift Trailer Entry  
S      Community Emergency Planning  
NA      Cardinal Rule Audit System (Refer to 1990-5 & 1992-2)

PROCESS HAZARD CONTROL

S      Relief Valve and Rupture Disc Inspection  
S      Flame Arrestor and Vent Line Inspection  
S      Plant Evacuation  
S      Disaster Preparedness  
S      Hot Work System  
S      Lockout System  
S      Vessel Entry System  
S      Maintenance Work Order System

ACCIDENT INVESTIGATION AND ANALYSIS

S      Accident Investigation by Supervisor  
S      Management Systems Investigation  
S      Corrective Action Follow-Up System

The Status of the Individual Components Will be Indicated by:

S - The Program Element      NA - The Program Element  
is Satisfactory              Needs Attention

TOTAL SATISFACTORY: 38      TOTAL NEEDS ATTENTION: 3