



Dow U.S.A.

The Dow Chemical Company
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VINYL II CONSOLIDATED AUDIT ONE YEAR FOLLOW UP

Enclosed is a summary of correction action items that are not yet totally complete. To date 148 items out of 165 have been addressed or are complete. This equates to close to 90%. If you would like exact details on follow up status for the other items, please let me know. I suppose these will all be reviewed during the next audit in August 1993.

A handwritten signature in cursive script, appearing to read "Chris Messelt".

Chris Messelt

cbh

attachment

R&S149534

VINYL II PLANT
CONSOLIDATED AUDIT PROGRAM
ITEMS OUTSTANDING AS OF 11/30/92

REACTIVE CHEMICALS AUDIT

- * 4. Chlorine service: Develop procedures for performing maintenance on chlorine lines. -

Chlorine equipment maintenance procedures will be developed by 12/31/91.

Responsibility: -

CHANGE TO 1/93

- * 9. Consider developing procedures that address the adding of waste materials to T-410. These procedures should address reactivity and flammability concerns. Written procedures should be established for minimizing the risk of inadvertently mixing together incompatible waste.

Waste storage guidelines and equipment labeling for T410 will be developed by 12/31/91. Responsibility:

CHANGE TO

CHANGE TO 4/93

- * 15. In order to minimize the potential for acetylene/chlorine explosion problems in Vinyl II scrubber review operation of the Miracle column with respect to the possibility of chlorine being sent to Vinyl II. If this potential exists safeguards should be installed to avoid the hazard.

Miracle column specs will be reviewed with Solvents/EDC I to identify possible hazards by 2Q92. Responsibility:

TO BE COMPLETE 4Q/92

17. The Reactive Chemicals Committee agrees with the need for evaluating and documenting worse case scenarios for each area of the process.

Worse case scenarios will be evaluated and included in the reactive chemicals training program by 2Q92. Responsibility:

4th Q TRAINING PLAN → 1/93

- * 19. Another area that is in need of improvement is training. The suggestion to consolidate pertinent reactive chemicals information into a dedicated training program is excellent and right on target. This could be included on C-9 checklist for documentation and follow-up.

A reactive chemical training program will be developed and implemented by 2Q92. Responsibility:

4th Q TRAINING PLAN → 1/93

ELECTRICAL RELIABILITY AUDIT:

7. Label all buildings, electrical equipment and devices in accordance with S&LP S-316-3.

This labeling will be done by the end of 3Q92. Responsibility:

CHANGE TO 6/93

LABORATORY AUDIT:

7. New employees receive mostly hands on training and is reviewed by the lab specialist and supervision. Very little to no documentation of such training was found. Consider developing an IPT module for this training. Documentation should be kept in one location.

Will develop IPT's for lab training by 3Q92. Responsibility:

COMPLETED & BEING REVIEWED → 1/93

LOSS PREVENTION/FIRE/BURNER MANAGEMENT AUDIT

FIRE PROTECTION:

- * 3. Sprinkler protection needs to be added to D-109. Contact Engineering and Loss Prevention to design coverage and arrange the installation.

Design of this additional coverage will be initiated by 12/31/91.

Responsibility:

DESIGN COMPLETE - ON HOLD FOR \$

CRITICAL INSTRUMENTS:

- * 1. The instrumentation testing procedures should be reviewed to be sure your specific intentions are being implemented. Many of the procedures are simple functions tests and do not appear to check a range of operation that may be needed in some cases. These should be reported back to a responsible plant or technical supervisor.

These have been reviewed and I/E to expand procedures by 2Q92.

Responsibility:

STILL WORKING - CHANGE TO 2Q93

CHANGE TO

* *Occupational Health*
EDUCATION AND TRAINING:

4. The orientation film is very well done, but when it is updated it should include Asbestos and address the mouthbit respirator usage.

To be updated by 4Q92. Responsibility:

BY 1/93

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HEARING CONSERVATION:

- * 1. It has been several years since employees were evaluated for noise exposures using personal audio dosimeters and it is recommended that these profiles be re-established for each job assignment. Histograms from the Quest M-27 will be helpful in pinpointing potential noise exposures. The written Hearing Conservation program should be updated using the new Division format.

Noise exposure profiles will be completed and hearing program updated by 3Q92. Responsibility: *COMPLETED PROFILES - CHANGE TO TO BE REVIEWED WITH IH.*

3. Since recreational noise also can contribute to hearing loss, it would be beneficial to include off-the-job noise exposure information in the hearing conservation training program. A program on off-the-job noise exposure is available through in the Medical Department.

Off-the-job noise exposure will be included in the updated hearing program by 3Q92. Responsibility: *CHANGE TO BY 12/92*

4. We support your suggestion to have the Division Noise expert perform octave band analysis and make recommendations for engineering controls.

Based on area noise evaluations engineering controls will be evaluated by 3Q92. Responsibility: *BY 1/93*

VINYL CHLORIDE:

- * 2. We need to work with the Technology Center on the practical implementation of key elements of the vinyl chloride standard.

Tech Center will be consulted on this by 12/31/91. Responsibility: *TECH CENTER WORKING ON THIS*

SAFETY/SECURITY AUDIT**SAFETY TRAINING:**

All new Dow and contract employees receive a block safety indoctrination. Daily tailgate, weekly and monthly safety meetings are used effectively. Staff JSA's are also effective. Special training is utilized in critical areas.

RECOMMENDATIONS:

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- * 1. Update block indoctrination video relative to harnesses and respirators. Also, develop and utilize a test to check comprehension of what is discussed in the indoctrination session (including video). An IPT module would be helpful.

An IPT module will be developed on the existing indoctrination video by 12/31/91. Responsibility:

COMPLETE

The indoctrination video and module will be updated by the end of 3Q92. Responsibility:

BY 1/93

CHEMICAL EXPOSURE INDEX AUDIT

- * 3. Plant management should review the need to carry a personal respirator in the plant and should update the plant indoctrination film accordingly.

This has been evaluated and we do not feel there is a need to carry personal respirators at Vinyl II due to the design and layout of the plant. Respirators are available for anyone desiring to do so. The plant indoctrination film will be updated by 3Q92. Responsibility:

~~BY~~ 1/93

14. Develop written procedures for spill mitigation.

Generic procedure to be developed by 12/31/92. Responsibility:

~~ON SCHEDULE~~

12/31/92

1/93

REDACTED

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