TENNECO

TENNECO OIL COMPANY P&M
(COMPANY)

INTEROFFICE COMMUNICATION

TO: DATE: FEBRUARY 21, 1985

FOR: SEE DISTRIBUTION

FROM: P. J. HUGHES

RE: BURLINGTON/FLEMINGTON LOSS CONTROL AUDITS

The loss control audits for the Burlington and Flemington Polymers facilities are scheduled for the week of 24 February 1985. The audit at Burlington will begin the morning of 25 February with an overview of the audit program and objectives. We should conclude the audit around 1100 hours on Wednesday, the 27th, with a discussion of the audit's findings.

The Flemington audit will begin the afternoon of the 27th with opening comments and conclude the afternoon of 1 March with a discussion of the findings.

If you could arrange to have random samples of the following records and reports which are applicable available, it would greatly expedite the audit.

- Pressure vessel inspections.
- Relief valve inspections.
- Piping thickness inspections.
- Emergency shut-down controls including boiler test logs.
- Ladder inspection logs.
- Elevator inspection logs.
- Mechanical lifting equipment logs.
- Emergency equipment (i.e., fire pumps, generators) test logs.
- Sprinkler, fire hose, fire extinguisher inspection logs.
- Emergency alarm test log and procedure.
- Emergency action plan including evacuation plan.
- Hoist operator training logs.
- Portable power tool inspection logs.
- Forklift operator training records.
- Ventilation/exhaust system maintenance logs.
- Emergency eye wash (shower inspection).
- Inspection/calibration logs for O_2 & combustible gas meters, sample pumps, etc.
- Training records for use of meters such as O_2 and combustible gas.
- Radiation wipe test results.
- Welding equipment inspection reports.
- Respiratory protective equipment inspection reports and user training logs.
- Safety meeting minutes.

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- Accident investigation reports.
- Health hazard monitoring records including VCM and lead.
- Communications to employee of monitoring results, physicals, etc.
- Noise exposure monitoring records.
- Employee training records including VCM, lead, new employee, etc.
- Filled out permit forms such as hot work and confined space entry.
- Material safety data sheet reference file.
- Current as built drawings including electrical schematics.
- Electrical system test reports including infrared scans and dielectric absorption.

P. J. Hughes

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PJH/jw

DISTRIBUTION

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LOSS CONTROL PROGRAM EVALUATION

	Yes/No		Comments

I: Management Support

A. Has management prepared and publicized a written statement of safety policy?

B. Has management established objectives to:

1. Plan work to minimize personal injury, property damage and loss of productive time?

2. Provide for protection of adjacent public property and the safety of the public?

C. Has management delegated sufficient authority to supervisors and foremen so that they can carry out the stated responsibilities for these positions?

Does management hold them accountable for the desired results? How?

D. Does management participate in the safety effort? To what extent?

E. Does management assure that employees understand and adhere to the general safety requirements?

F. Is management familiar with the obliga-tions to comply with applicable safety regulations and reporting procedures?

G. Does management communicate and cooperate with:

1. Line Management?

2. Employees?

3. Safety Staff?

H. Has a safety and health complaint program been established and published by manage-ment? Does the program require action by:

1. Top Management?

2. Supervision?

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	Yes/No	Comments
I. Has a safety and health infractions disciplinary policy been established? Is it enforced?		
J. Does management make sure that the following are performed and/or completed as necessary?		
1. Toolbox safety meetings		
2. Inspections		
3. Accident investigations		
II. Safety and Health Staff		
A. Is there a safety representative on site?		
Have his duties been clearly communicated and does he understand the responsibility and authority of the position?		
B. Has a safety committee been established and do the members understand their duties and responsibilities?		
C. Does the safety representative coordinate his activities with other site personnel?		
D. Does the site safety representative take necessary steps to immediately implement appropriate recommendations?		
E. Does the site safety representative attend and actively participate in safety meetings and plant inspections?		
F. Are basic reference materials maintained by the site safety representative and are they current?		
G. Does the site safety representative have the authority to stop a job?		
H. Is the site safety representative in the review loop for:		
1. New construction?		
2. Design or Process changes?		
3. Special projects?		
4. Materials purchases?		

	Yes/No		Comments

III. New Employee Orientation

A. Has an orientation program for new employees been established which includes a review of:

1. Hazards present in his assignment in the general area in which he works?

2. Method of reporting any unsafe conditions which the worker may encounter?

3. General facility safety rules and regulations?

4. Emergency procedures?

B. Are new employees acquainted with the established rules and regulations for the site and is a signed copy kept in the employee's personnel file?

C. Are new employees made aware of management support for the safety program?

D. Do new employees receive on-the-job training?

E. Are new employees made aware of existing hazards?

IV. Employee Training and Awareness

A. Has an educational program been established to stimulate and maintain interest and participation of all employees in safety through:

1. Safety meetings and safety communications?

2. Employee instructions applicable to assigned work?

3. Special safety training programs on an as-required need?

4. A safety incentive program?

B. Are foremen provided with appropriate material for toolbox safety meetings and are these meetings being held?

1. Do foremen discuss observed unsafe work practices or conditions at these meetings?

	Yes/No	Comments

2. Do foremen review accident experience and corrective measures at these meetings?

3. Do foremen encourage safety suggestions from attendees?

C. Are meetings periodically evaluated for effectiveness by the safety representative?

D. Are minutes submitted along with a list of the names of attendees by each foreman documenting these meetings and are they reviewed by the site safety representative?

E. When employees are transferred to another job, do they receive training and are they made aware of any new hazards associated with this job?

F. Do employees who have been on the job for a long time receive refresher training?

G. Are records kept of training which employees receive?

V. Rules and Regulations

A. Does the facility have a published safety policies and procedures manual?

1. Is it available to all employees?

2. Is it reviewed annually by management and maintained current?

B. Are material safety data sheets for all hazardous materials on site readily available and maintained current?

C. Are the material safety data sheets reviewed by the site safety representative for:

1. Content and completeness?

2. Prior to purchase of materials?

D. Have standard operating procedures been developed for all critical operations and are they followed and maintained current?

	Yes/No	Comments

E. Have engineering design specifications been established, and are they adhered to for all facility modifications?

F. Are job/task safety analysis procedures developed and used on hazardous and unusual jobs?

G. Have procedures for programs such as hearing conservation, respiratory protection, and hazardous materials handling been developed and implemented?

H. Have procedures been established for handling of agency inspections (i.e., OSHA, Insurance, State)?

VI. Supervisory Training

A. Has a supervisory training program been established?

B. What procedures are used for training foremen?

C. What is the content of this training?

D. Does the site safety representative work with foremen on meeting preparation, accident investigation, plant inspections, etc.?

E. Are the above activities documented?

VII. Personal Protective Equipment - Availability

A. Is appropriate and required personal protective equipment provided and are adequate supplies on hand?

B. Have all special and unusual exposures for which personal protective equipment is required been identified?

C. Have appropriate training programs been implemented regarding use, care, selection, and maintenance of protective equipment?

D. Is emergency personal protective equipment properly placed and employees trained in its use?

	Yes/No		Comments

VIII. Personal Protective Equipment Use

A. Is the personal protective equipment which is provided used by the employees as required and as it is intended to be used?

B. Is the equipment properly maintained?

C. Is the equipment inspected on a regular basis and records maintained?

D. Is the equipment properly stored?

IX. Accident Investigation

A. Has an accident investigation program been established?

What accidents and losses are investigated?

B. Does top management review accident investigation reports?

C. Does the site safety representative assist in the preparation of accident investigation and reporting procedures?

D. Does each foreman complete a supervisory investigation report on all accidents occurring in the department, and are they completed on a timely basis?

E. Are effective accident investigations being conducted?

F. Is appropriate follow-up action taken on recommendations established by these investigations to prevent recurrence?

X. Accident Records

A. Are necessary records being maintained and are they kept current? (i.e., OSHA 200, first report of injury, supervisor's report of accident investigation)

B. Are records of accidents and losses readily available, and are proper records maintained?

C. Are these records reviewed by the site safety representative and is the necessary immediate action taken on safety records through directives or personal interviews with foremen, employees and/or management?

	Yes/No	Comments
1. Hot Work Permit 2. Vessel Entry Permit 3. Safe Clearance Permit (Lockout) 4. Excavation Permit 5. Others		
B. Are these permits being properly used in the field and are the requirements on these permits being strictly adhered to by personnel?		
C. Is monitoring equipment such as gas detectors, H_2S meters, oxygen deficiency meters, etc., available at the facility and is this equipment in good condition?		
D. Are key personnel such as operators and shift suipervisors trained in the use of this equipment?		
E. Are tests being made for gas, oxygen deficiency and hazardous materials as required?		
F. Are noise surveys being made on an as required basis?		
G. Are all meters calibrated on a periodic schedule and are records of calibration maintained?		
H. Is periodic sampling for airborne contaminants at the facility and/or personnel monitoring conducted?		
I. Has management designated an individual at the facility to oversee industrial hygeine activities?		
J. Are proposed changes in materials used at the facility reviewed by a knowledgeable person for potential health hazards and recommendation of special handling procedures?		
K. If nuclear sources are used at the facility is there a radiation officer on site and has a radiation safety program been established?		
L. Are laboratory practices such as those listed below adhered to? 1. Use of protective equipment 2. Storage of chemicals and flammables		

Yes/No Comments

3. Use of hoods when working with hazardous and flammable chemicals

4. Control of food and drink in labs

5. Housekeeping.

XV. Loss Rates

A. Is the site above or below average using the most current Bureau of Labor Statistics rates for the appropriate SIC number?

SIC #______ for year ____ Description

________________	BLS	Facility
1. Loss Workday cases	________	________
2. Non-fatal cases without loss workdays	________	________
3. Total recordable	________	________
4. Working days lost	________	________

XVI. Contractor Safety Program Administration

A. Has each contractor been provided with a copy of the facilities safety manual?

B. Has each contractor working on site been orientated to the facility regarding:

1. Facility Safety Rules?

2. Emergency Plans and Evacuation Procedures?

3. Accident and Incident Reporting Procedures?

C. Has the orientation program and issuance of the Safety Manual been documented?

D. Is each job on which contractors will be working thoroughly reviewed with the contractor?

E. Have contractor tools and safety equipment been evaluated to determine if they are appropriate for the job and in overall good condition?

	Yes/No	Comments
F. Does each contractor at the site provide a safety plan of their own?		
G. Does each contractor adhere to site permitting procedures and lockout procedures?		
H. When work performed by a contractor requires a written procedure, does the contractor obtain approval of this procedure and follow this procedure when performing the work?		
I. Does each contractor working on site conduct:		
1. Safety meetings?		
2. Work area inspections?		
3. Accident investigations?		
J. Are contractors on site cooperative with site management and personnel?		
K. Has each contractor provided adequate First Aid trained personnel and supplies?		
L. Does contractor management at the site actively support safety and cooperate with the Site Safety Representative?		
M. Does each contractor on site provide necessary reports (such as):		
1. Copy of OSHA log		
2. Accident reports		
3. Property Damage Reports		
4. Hours worked		
and are these reports submitted on a timely basis?		
N. Is each contractor's Accident/Incident Investigation Program adequate?		
O. Is each contractor's Injury and Loss Incidence rates above or below the industry average?		

	Yes/No	Comments

I. Emergency Preparedness

A. Have written emergency procedures been established for the following and are personnel familiar with these procedures?

1. Fire
2. Injury to employees
3. Injury to general public
4. Property damage
5. Spill or leak of hazardous material
6. Bomb threat or other acts of violence
7. Severe weather (hurricanes, tornadoes, etc.)

B. Have emergency operating procedures been established to keep critical equipment at the facility on line and/or to bring the facility down safely?

C. Have emergency backup communications systems been established and are they tested weekly?

D. Is emergency equipment such as generators and vehicles checked and run weekly?

E. Has an emergency team(s) been established and do all members understand their assignments?

F. Is the emergency team(s) trained at least monthly and is this training documented?

G. Are emergency drills conducted at the facility at least semi-annually and are they crituqued?

H. Is the facility completely fenced with the fence being free of weeds and structures for 10-feet on each side, and is there adequate perimeter lighting?

I. Is there a security force at the facility and do they conduct roving patrols?

J. Are the roving patrols documented by a key clock or other monitoring system?

K. Are all employees at the facility required to wear a badge and show it for entry to the facility?

	Yes	No	Comments
L. Are all visitors to the facility required to sign in and issued a badge which they are required to wear?			
M. Are visitors required to be escorted by an employee at all times while they are at the facility?			

LOSS CONTROL PROGRAM EVALUATION EMPLOYEE QUESTIONNAIRE

(1) Do you feel the facilities safety program has:

(a) Top Management Support? Yes ___ No ___

(b) Supervisory Support? Yes ___ No ___

(c) Employee Support? Yes ___ No ___

Comments: ______________________________

____

(2) Do you feel that the safety program has improved in quality while you have been at this facility?

Yes ___ No ___

Comments: ______________________________

____

(3) What are the strong points of the facilities safety program?

Specify: ______________________________

____

(4) What are the weak points of the facilities safety program?

Specify: ______________________________

____

(5) Are safety communications to employees adequate in quality and frequency?

Employee Orientation: Yes ___ No ___

Specific Task Training: Yes ___ No ___

Safety Meetings: Yes ___ No ___

Comments: ______________________________

____

(6) Do you as an employee feel that you are encouraged to participate in the facilities safety program?

Yes ___ No ___ TEN 4534

Comments: ______________________________

(7) **By title, who, in your opinion, has responsibility for day to day employee safety?** ______________________

Why? ______________________

____

(8) Is there anything you as an employee could do to improve the facilities safety awareness? Yes ___ No ___

If yes, what: ______________________

____

(9) Are you aware of any existing unsafe conditions or unsafe acts that need to be evaluated? Yes ___ No ___

If yes, what: ______________________

____

(10) In your opinion, are unsafe conditions corrected in a reasonable amount of time after they are brought to the attention of Management? Yes ___ No ___

Comments: ______________________

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General Data

Job Title ______________________ Salary or Hourly ________

Department ______________________

Years at this facility ________

Age _____