

Monsanto

FROM (NAME & LOCATION)

R.T. Hammann, LP&S, Texas City 0-22

PLAINTIFF'S EXHIBIT

MON-2983

DATE

November 4, 1982

CC:

SUBJECT

1982 S&PP SURVEY RECOMMENDATIONS

REFERENCE

TO : G.A. Danner 0-8 D.D. Kos 0-11 S.G. Pappas 0-9
G.W. Daues 0-5 C.M. McCullough 0-12 G.T. Ryan 0-11
J.A. Glass 0-22 D.W. Metten 0A-19 G.E. Small 0A-12
D.E. Kaldenberg 0-7 C.F. Navarrete 0-10A J.G. Trafton 0-6
B.C. Lancaster CED M.L. Owens 0A-13A G.L. Tromblee 0-10

Attached is a copy of the recommendations from the 1982 S&PP Survey conducted by Tom Lawrence in September.

Please review these recommendations and respond in writing to me by December 1 on those recommendations for which you are responsible. This will enable us to compile these responses for review in the December PMSB meeting, so that we can give a final report to S&PP by mid-January as requested.

Please contact me if you have any questions.


R.T. Hammann

Attachments

RTH/es

SC

002071

LAM003276

SAFETY AND PROPERTY PROTECTION
SURVEY RECOMMENDATIONS
TEXAS CITY
SEPTEMBER 13-17, 1982

NEW RECOMMENDATIONS:

82-1 Nitrogen Backup of Instrument Air

Capability for manual charging of nitrogen into the instrument air header is provided in several units to maintain instrument function in the event of instrument air low pressure. It is recommended that measures be taken to insure that the nitrogen is not allowed to remain hooked into the instrument air system longer than necessary to restore the instrument air system. A tag or other visible reminder that the system is on nitrogen, located in the appropriate control rooms, is a suggested approach.

The concern here is that nitrogen left hooked to the instrument air system for an extended period of time could back into the air header for that unit and thus, for example, pose a potential hazard for employees using air to power air driven tools in a confined space.

RESPONSIBILITY: SHAC

82-2 Emergency Shutdown/Standby Procedures

Operating unit emergency procedures should include procedures for quickly bringing the unit down or placing it in the safest possible condition should a quick evacuation of the control room become necessary. It should be assumed that access to the control room could be regained within one hour.

RESPONSIBILITY: SAC

82-3 Scaffold Construction Practices

Scaffold construction practices appeared to be satisfactory with the exception of the inclusion of toe boards. Toe boards are standard scaffold construction practice and their proper installation on scaffolds should be reemphasized.

RESPONSIBILITY: C.M. McCullough

82-4 Metal Hard Hats

A number of employees continue to wear metal hard hats. Those employees whose routine work places them in proximity to electrical power, eg, electricians, are required to wear plastic hats. However, employees with metal hats may from time to time, during emergency or in some routine situations, also be placed in proximity to electrical voltage. It is recommended that metal hats be phased out.

RESPONSIBILITY: SAC

82-5 Trash Dumpster Location

A trash dumpster near the acetic acid unit is located directly beneath a pipe bridge. It should be relocated and a survey made to see if other trash dumpsters are exposing valuable pipelines, equipment, or electrical facilities by their location.

RESPONSIBILITY: C.M. McCullough

82-6 Tank Valve Blind Flanges

Several tanks were observed in the oxo/esters units with bottom valves having no blind flange on the outlet side. Where a tank bottom valve, were it to leak, could cause hazardous conditions or could present other environmental exposures should be closed with a blind flange.

RESPONSIBILITY: SAC

82-7 Fabric Slings

Several fabric slings were observed oil soaked and with some thread damage. It is recommended that a program be established to replace fabric slings on a routine basis.

RESPONSIBILITY: C.M. McCullough

82-8 Electric Welding Practices

It is understood that plant practice calls for the negative lead from an arc welder to be clamped as close as practical to the actual welding site. A couple of instances were observed where this was not being followed. The negative lead was clamped to building steel near the welding machine while the positive lead was taken to the actual welding area location. It is recommended that proper practice be reemphasized.

RESPONSIBILITY: C.M. McCullough

82-9 Confined Space Entry Permit Warning

Pits or other confined spaces where confined space entry permit is required for entry should be marked to that effect with an appropriate sign. An example of an area needing such marking is the waste pit area below the grating at the IDA II unit.

RESPONSIBILITY: SHAC

CONTINUED RECOMMENDATIONS81-6 Portable Buildings/Trailers

Increasing numbers of combustible trailers and portable buildings pose a major loss potential to the plant unless their exposure to plant facilities

is carefully controlled. It is recommended that combustible trailers/portable buildings be located at least 50 feet from process facilities, control room, pipe bridges, sub-stations, etc.

STATUS: An identification and siting control policy has been adopted and a number of portable buildings have been removed or identified for removal. However, many of the buildings remaining need to be relocated in order to reduce fire exposures to more valuable facilities.

RESPONSIBILITY: SHAC

81-7 Sprinkler Protection (Revised 1982)

The following buildings need to be sprinkler protected or need sprinkler modifications:

- a. The office areas in the main shops building need to have sprinklers dropped through the ceiling. Partitions are plywood on wood studs or wood furring strips. Other partitioned rooms in the shop also need sprinklers dropped through the ceiling.
- c. Sprinklers need to be installed below the grating mazzanine in the stores shelving system and in the office areas in the stores receiving area.

STATUS: a. The plans are to accomplish this item in the second quarter of 1983.

c. This work has been budgeted for 1983.

RESPONSIBILITY: C.M. McCullough

80-5 Lactic Acid Venting

Most all conservation and emergency relief vents from the batch operated equipment discharges into a relatively small header and circuitously finds its way to the flare.

Reevaluate the overpressure protection (emergency relief) on all vessels in the lactic acid process, the relief size, the inspection program and particularly the discharge piping to ensure that all vessels can be safely relieved during a process upset or fire situation. The sections of Bondstrand pipe are suspect if containment is required.

STATUS: This project was referred to CED for evaluation. They agreed that under certain conditions the vent system could become overloaded. However, they could not justify spending time on a design due to other priorities. The project has been returned to the plant TSD group where it is under study.

RESPONSIBILITY: J.G. Trafton

78-15 EB Dehydro Unit

The flammable storage for the EB dehydro bench unit in the lab is located outside and just below the large windows. A fire in this storage would most likely cause heavy damage to the unit. The windows should be blocked up or material moved away from the building.

STATUS: Several improvements were made to the raw materials drum storage area to minimize fire or other hazards. However, the hazard remains plus a spill and fire in that area would also expose nearby gas cylinders. A similar condition also exists in the waste storage area on the opposite side of the building. S&PP continues to recommend that the storage area be improved to reduce hazards to both the building and to nearby gas cylinders.

RESPONSIBILITY: M.L. Owens