

Process Safety Audit - November 1994

T. Michael Jones & Associates conducted an audit of our process areas covered by the OSHA Process Safety Standard during the week of November 14, 1994. Fourteen opportunities for improvement were identified. As of 9/8/95 the status of these opportunities is:

<u>IO #</u>	<u>Description</u>	<u>Status</u>
A9401	Provide a site plan which explains how the plant manages the PSM program. Graphically identify the PSM areas within the facility.	Plan drafted and being reviewed for comments. Complete by 10/95 <i>Finalized.</i>
EP9402	Expand SP-2 Employee Participation policy to explain why employee involvement committees exist and document actions taken to closure.	<u>Complete</u> - Policy revised. All involvement groups need ongoing mechanism to document actions taken on PSM related issues.
PSI9403	Each identified PSM area must develop all process safety information required by section 1910.119(d).	Nearly complete - each PSM area coordinator has list of few remaining items needed. Complete by 11/95. <i>Tank Farm good - some items lacking.</i>
PSI9404	Provide an index system for PSI information.	<u>Complete</u> - will use "catalogue list of documents"
PHA9405	Document that facility siting and human factors are considered when PHA's are completed.	Complete for suspension and ammonia. Being addressed in dispersion. To be complete in tank farm by 11/95.
PHA9406	Establish tracking system to address PHA findings.	Complete - will use Manage PC software. Recommendations from Hazops pulled into Manage PC. Need to assign responsibility and update status
OP9407	Insure consequences of deviations in operating conditions are identified in all PSM areas.	Need for tank farm and NH3 chillers. Safe upper and lower operating limits and consequences of deviations are part of PS info. Complete by 11/95. <i>Not in SOP, but in Area manual</i>
T9408	Verify and document that operators have had input into the training frequency.	<u>Complete</u>
C9409	Conduct and document annual job evaluations on all contractors that work in a PSM area.	System revised to collect and maintain this data. Complete by 10/95
PSSR9410	Insure pre-startup punch lists become part of the project file.	<u>Complete</u>

100% complete PSA

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MI9411	Testing, inspection and documentation is required on piping and components in PSM areas.	<u>Complete</u> - tank farm and NH3 done in 1995. Need to do dispersion or suspension in 1996.
MOC9412	Review the plant's MOC policy to assure desired results are being achieved.	<u>Complete</u> - SA-36 revised and reissued.
EPR9413	Update ER Plan listing of key personnel and phone numbers.	<u>Complete</u>
TS9414	Consider secrecy agreement for contractors who work in sensitive plant areas.	Complete - agreement exists with Ogden. Consider on case by case basis for others.