6. H

PLAINTIFF'S EXHIBIT

SH-2385

MANAGER T. E. MEYER

UNIT LIGHT OLEFINS III

BA AREA OLEFINS

DATE SEPTEMBER 23, 1988

QTR/YR 4TH - 1988

DPMC COMPLIANCE AUDITS

Audit Subject: HEALTH & SAFETY TRAINING RECORDS AUDIT

Participants in Opening Conference:	Participants in Closing Conference:
K. W. Leach	K. W. Leach
E. P. Manley	E. P. Manley

Reference Documentation: OSHA 1910 - DPMC Health & Safety Order Book.

Compliance Issues Revealed by Audit: Complete listed Health & Safety training records by year end 1988. Implement bi-annual Smoke House Training by year end 1988.

Corrective Action Plan (Including Designated Responsible Individuals): Implement Smoke House Training for 1988.

Comments: See attached sheets.

Compliance Date: ______ Follow-Up Audit Date: ______

LAM 002754

SAFETY.01
OLEFENG

DPMC-08883

MANAGER T. E. MEYER
UNIT LIGHT OLEFINS III
BA AREA OLEFINS

DATE SEPTEMBER 23, 1988
QTR/YR 4TH - 1988

DPMC COMPLIANCE AUDITS (CONT'D)

Audit Subject: Health & Safety Training Records

1. Hearing Conservation
   Training Records 65% complete for 1988.

2. Warning Signs - Employees questioned were familiar with S-112.

3. Hazard Communication - Training records 50% complete for 1988.

4. Embryo/Fetus Program - Current, Record on file in Industrial Hygiene.

7. Emergency Action Plan - Training Records 90% complete for 1988. Training done by monthly Safety and Emergency Drills.

10. Portable Fire Extinguishers - Training Records 25% complete for 1988.

12. Respiratory Protection - 1) Training Records 68% complete for 1988.
    2) Implement Smoke House Training before year end 1988.

13. Asbestos - Training Records 45% complete for 1988.

DPMC COMPLIANCE AUDITS

HEALTH & SAFETY TRAINING

Unit/Area Light Olefins III Date: September 23, 1988

Reference: See "Health & Safety Training Audit - Reference Document" for individual references and more information or requirements. Primary references are the OSHA 1910 Standard and DPMC H&S Order Book.

Audit Items:

	CATEGORY	AUDIT	
1.	Hearing Conservation	R	
2.	Warning Signs	K	
3.	Hazard Communication	R & P	
4.	Embryo/Fetus Program	R	
5.	LPG Storage and Handling Facilities	P	(N/A)
6.	Storage Tanks	P	(N/A)
7.	Emergency Action/Emergency Response	R	
8.	Fire Brigade	R	(N/A)
9.	Portable Fire Extinguishers	R	
10.	Hazardous Waste Operations	R	(N/A)
11.	Emergency Response Teams	R	
12.	Respiratory Protection	R	
13.	Asbestos	R	
14.	Lead	K	(N/A)
15.	Aerial Lift Equipment	R	(N/A)
16.	Powered Industrial Trucks (Forklifts)	R	(N/A)
17.	Cranes	P or R	(N/A)
18.	Slings	K	(N/A)
19.	Mechanical Power Presses	P or R	(N/A)
20.	Welding	P or R	(N/A)

R = Records
P = Written procedure, training manual, etc.
K = Knowledge, audit by interview

LAM 002756

SAFETY.F15
OLEFENG

DPMC-08885

4

C.H.

MANAGER W. J. DANIELS

UNIT BD/HT/IP

BA AREA OLEFINS

DATE SEPTEMBER 22, 1988

QTR/YR 4TH - 1988

DPMC COMPLIANCE AUDITS

Audit Subject: HEALTH & SAFETY TRAINING RECORDS AUDIT

Participants in Opening Conference:	Participants in Closing Conference:
D. C. Brooks	D. C. Brooks
E. P. Manley	E. P. Manley

Reference Documentation: OSHA 1910 - DPMC Health & Safety Order Book.

Compliance Issues Revealed by Audit: None, all records current for 1988. However, bi-annual Smoke House Training due before year end 1988.

Corrective Action Plan (Including Designated Responsible Individuals): Implement Smoke House Training for 1988.

Comments: See attached sheets.

Compliance Date: Follow-Up Audit Date:

LAM 002757

SAFETY.01
OLEFENG

DPMC-08886

MANAGER W. J. DANIELS

UNIT BD/HT/IP

BA AREA OLEFINS

DATE SEPTEMBER 22, 1988

QTR/YR 4TH - 1988

DPMC COMPLIANCE AUDITS (CONT'D)

Audit Subject: Health & Safety Training Reference Document

1. Hearing Conservation
   Current - June 1, 1988

2. Warning Signs - Employees questioned were familiar with S-112.

3. Hazard Communication - Done - January 1988

4. Embryo/Fetus Program - Current 1988

6. Storage Tanks - In Hurricane Procedures Manual.

7. Emergency Action Plan - Current, training done February 1988.

10. Portable Fire Extinguishers - Annual training done 4/88.

12. Respiratory Protection - 1) Annual Training done July 1988.
    2) Bi-annual Smoke House Training due 1988. 3) Fit Testing done May'88.

13. Asbestos - Annual training completed March 1988.

DPMC COMPLIANCE AUDITS

HEALTH & SAFETY TRAINING

Unit/Area BD/HT/IP Date: September 22, 1988

Reference: See "Health & Safety Training Audit - Reference Document" for individual references and more information or requirements. Primary references are the OSHA 1910 Standard and DPMC H&S Order Book.

Audit Items:

	CATEGORY	AUDIT	
1.	Hearing Conservation	R	
2.	Warning Signs	K	
3.	Hazard Communication	R & P	
4.	Embryo/Fetus Program	R	
5.	LPG Storage and Handling Facilities	P	(N/A)
6.	Storage Tanks	P	
7.	Emergency Action/Emergency Response	R	
8.	Fire Brigade	R	(N/A)
9.	Portable Fire Extinguishers	R	
10.	Hazardous Waste Operations	R	(N/A)
11.	Emergency Response Teams	R	(N/A)
12.	Respiratory Protection	R	
13.	Asbestos	R	
14.	Lead	K	(N/A)
15.	Aerial Lift Equipment	R	(N/A)
16.	Powered Industrial Trucks (Forklifts)	R	(N/A)
17.	Cranes	P or R	(N/A)
18.	Slings	K	(N/A)
19.	Mechanical Power Presses	P or R	(N/A)
20.	Welding	P or R	(N/A)

R = Records
P = Written procedure, training manual, etc.
K = Knowledge, audit by interview

LAM 002759

SAFETY.F15
OLEFENG

DPMC-08888

C.H.

MANAGER S. A. GRANT

UNIT PYROLYSIS II/III

BA AREA OLEFINS

DATE SEPTEMBER 21, 1988

QTR/YR 4TH - 1988

DPMC COMPLIANCE AUDITS

Audit Subject: DPMC COMPLIANCE AUDIT - HEALTH & SAFETY TRAINING REFERENCE DOCUMENT

Participants in Opening Conference:

K. D. Yielding
E. P. Manley

Participants in Closing Conference:

K. D. Yielding
E. P. Manley

Reference Documentation: OSHA 1910 Standard & DPMC Health & Safety Order Book.

Compliance Issues Revealed by Audit: Smoke House Training due in 1988 - no compliance issue.

Corrective Action Plan (Including Designated Responsible Individuals): Implement Smoke House Training before year end.

Comments: All records in compliance - see attached sheets.

Compliance Date: ______ Follow-Up Audit Date: ______

LAM 002760

SAFETY.01
OLEFENG

DPMC-08889

MANAGER S. A. GRANT
UNIT PYROLYSIS II/III
BA AREA OLEFINS

DATE SEPTEMBER 21, 1988
QTR/YR 4TH - 1988

DPMC COMPLIANCE AUDITS (CONT'D)

Audit Subject: Health & Safety Training Reference Document

1. Hearing Conservation
   Annual Records current 2/88

2. Warning Signs - Employees questioned were familiar with S-112.

3. Hazard Communication - Records current. No new chemicals added in the last few years.

4. Embryo Fetus - Records current.

6. Storage Tanks - In Pyrolysis II/III Training Manuals 2 3C3-8. Add Flood Control Procedures to Training Manuals.

7. Emergency Response Plan - By Safety Drills. June 1988

9. Portable Fire Extinguishers - Annual Training Current for 1988.

12. Respiratory Protection - 1) Annual Training current for 1988, 2) Smoke House Training due in 1988, 3) I.H. Fit Testing current, February 1988.

13. Asbestos - Records current for 1988.

DPMC COMPLIANCE AUDITS

HEALTH & SAFETY TRAINING

Unit/Area Pyrolysis II/III Date: September 21, 1988

Reference: See "Health & Safety Training Audit - Reference Document" for individual references and more information or requirements. Primary references are the OSHA 1910 Standard and DPMC H&S Order Book.

Audit Items:

	CATEGORY	AUDIT	
1.	Hearing Conservation	R	
2.	Warning Signs	K	
3.	Hazard Communication	R & P	
4.	Embryo/Fetus Program	R	
5.	LPG Storage and Handling Facilities	P	(N/A)
6.	Storage Tanks	P	
7.	Emergency Action/Emergency Response	R	
8.	Fire Brigade	R	(N/A)
9.	Portable Fire Extinguishers	R	
10.	Hazardous Waste Operations	R	(N/A)
11.	Emergency Response Teams	R	(N/A)
12.	Respiratory Protection	R	
13.	Asbestos	R	
14.	Lead	K	(N/A)
15.	Aerial Lift Equipment	R	(N/A)
16.	Powered Industrial Trucks (Forklifts)	R	(N/A)
17.	Cranes	P or R	(N/A)
18.	Slings	K	(N/A)
19.	Mechanical Power Presses	P or R	(N/A)
20.	Welding	P or R	(N/A)

R = Records
P = Written procedure, training manual, etc.
K = Knowledge, audit by interview

LAM 002762

SAFETY.F15
OLEFENG

DPMC-08891

MANAGER W. J. DANIELS

UNIT BD/HT/IP

BA AREA OLEFINS

DATE JULY 11, 1988

QTR/YR 3RD 1988

DPMC COMPLIANCE AUDITS

Audit Subject: S-125 ASBESTOS

Participants in Opening Conference:

B. R. Parker

E. P. Manley

Participants in Closing Conference:

B. R. Parker

E. P. Manley

Reference Documentation: DPMC Complex Order Book

Compliance Issues Revealed by Audit: None.

Corrective Action Plan (Including Designated Responsible Individuals):

None

See comment on Health & Safety Audit Sheet under 2A: Work Practices.

Comments:

Compliance Date: None Follow-Up Audit Date: None

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DPMC-08892

LAM 002763

DPMC COMPLIANCE AUDIT

ASBESTOS

Unit/Area BD/HT/IP   Date July 11, 1988

Reference: S-125, Asbestos

Audit Items:

1. Labeling/Signs:

   A. Are Unit boundary signs in place, i.e., near the plot edge and/or control room entrance? Yes, signs are in place.

   B. Does Operations/Maintenance know how to label bagged insulation?
      (1) Pre-labeled bag - Yes
      (2) Tagged - Yes

   C. Are warning signs being used?
      (1) Around asbestos work in progress - Yes
      (2) Are correct signs being used? Area vs Warning - Yes

2. Work Practices:

   A. Does Operations/Maintenance know how to get insulation tested for asbestos? Yes, by Industrial Hygiene.

   B. Does Operations/Maintenance know the precautions/procedures for handling/disposal of asbestos materials?
      (1) Wet method - Yes
      (2) Barricades with signs - Yes
      (3) Protective equipment - coveralls, respirator - Yes

3. Work Permits:

   A. Does Operations know permit requirements, i.e., coveralls, respiratory, signs? - Yes

   B. Are permits properly marked? No Permits in force at time of audit.

   C. Are MSDS sheets available? Yes, in Control Room.

COMMENTS: Work Practices 2A - Review with Shift Foremen and Operators through Safety Meetings, the Inspectors to call to test insulation for asbestos.

1. G. L. Buchanan - 7517/7420
2. H. E. Craddock - 7926/7420
3. W. L. Neal - 7370

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DPMC-08893

LAM 002764

MANAGER S. A. GRANT

UNIT PY-2, STF-OP-II X

BA AREA OLEFINS

DATE JULY 11, 1988

QTR/YR 3RD 1988

DPMC COMPLIANCE AUDITS

Audit Subject: S-125 ASBESTOS

Participants in Opening Conference:

K. W. Jones

E. P. Manley

Participants in Closing Conference:

K. W. Jones

E. P. Manley

Reference Documentation: DPMC Health & Safety Orders

Compliance Issues Revealed by Audit: None.

Corrective Action Plan (Including Designated Responsible Individuals):

None

See comment on Health & Safety Audit Sheet under 2A: Work Practices.

Comments:

Compliance Date: None Follow-Up Audit Date: None

SAFETY.FRM
OLEFENG 1

DPMC-08894

LAM 002765

DPMC COMPLIANCE AUDIT

ASBESTOS

Unit/Area PY2-STF-OPII-X Date July 11, 1988

Reference: S-125, Asbestos

Audit Items:

1. Labeling/Signs:

   A. Are Unit boundary signs in place, i.e., near the plot edge and/or control room entrance? Yes, signs are in place.

   B. Does Operations/Maintenance know how to label bagged insulation?
   (1) Pre-labeled bag - Yes
   (2) Tagged - Yes

   C. Are warning signs being used?
   (1) Around asbestos work in progress - Yes
   (2) Are correct signs being used? Area vs Warning - Yes

2. Work Practices:

   A. Does Operations/Maintenance know how to get insulation tested for asbestos? Yes, by Industrial Hygiene.

   B. Does Operations/Maintenance know the precautions/procedures for handling/disposal of asbestos materials?
   (1) Wet method - Yes
   (2) Barricades with signs - Yes
   (3) Protective equipment - coveralls, respirator - Yes

3. Work Permits:

   A. Does Operations know permit requirements, i.e., coveralls, respiratory, signs? - Yes

   B. Are permits properly marked? No Permits issued for asbestos removal at time of audit.
   C. Are MSDS sheets available? Yes, in Control Room.

COMMENTS: Work Practices 2A - Review with Shift Foremen and Operators through Safety Meetings, the Inspectors to call to test insulation for asbestos.

1. G. L. Buchanan - 7517/7420
2. H. E. Craddock - 7926/7420
3. W. L. Neal - 7370

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OLEFENG

DPMC-08895

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