

1994 CA II Consolidated Audit

Action Item Register

Action Item #: DFA-01

Status: complete

Priority: Must Do

Action Item Name: All lines and valves need to be identified

Action Item Description: All lines and valves associated with product off-loading need to be identified by marking, labeling, or tagging. Also, any containers used to catch drippings need to be marked, etc.

Person(s) Responsible: Spears, Tony

Expected Completion Date: July 31, 1995

Actions Recommended: As stated.

Actions Taken: Done per Tony Spears.

Actual Completion Date: April 15, 1995

Closure Approved? Yes

By: Spears

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-02 Status: complete

Priority: Must Do

Action Item Name: Display caution signs

Action Item Description: Caution and/or warning signs for the hazards of the product or nearby hazards (chlorine, cell effluent) need to be displayed in the Freon 12 area.

Person(s) Responsible: Mellieon, Harold

Expected Completion Date: July 31, 1995

Actions Recommended: As stated.

Actions Taken: No action needed. We have the process in place to notify/warn outside deliveries of plant hazards through warning signs, chemical unloading checksheets, and Dow personnel interface.

Actual Completion Date: July 31, 1995

Closure Approved? Yes By: Douglas

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-03

Status: complete

Priority: High

Action Item Name: Need to recommend safety procedure for sodium bisulfite

Action Item Description: Sodium bisulfite has a mild skin/eye corrosion and inhalation toxicity rating (DRI); it is recommended that the operator at least be advised to stand up-wind and/or wear some light air-purifying protection

Person(s) Responsible: Mellieon, Harold

Expected Completion Date: June 30, 1995

Actions Recommended: Add to unloading procedure for this supply chemical.

Actions Taken: Revised the tank truck off-loading procedure for sodium bisulfite. (CKLST568.doc)

Note: Management of Change for this procedure revision required more time to get updated in the procedure library than anticipated.

Actual Completion Date: March 28, 1996

Closure Approved? Yes

By: Heins

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-04

Status: complete

Priority: High

Action Item Name: Hydrogen transfer hoses be put into Pressure Vessel Program

Action Item Description: For hydrogen service, it is recommended that the transfer hoses be put into the Pressure Vessel program.

Person(s) Responsible: Kolder, Roy

Expected Completion Date: June 30, 1996

Actions Recommended: Determine if the transfer hoses are in the PV system. Work with the department Pressure Vessel Coordinator to define necessity.

Actions Taken: The in-service hose was not in the PV program. Due to continuous use service, a new hose meeting PV program requirements was purchased and installed in June 1996.

Actual Completion Date: June 15, 1996

Closure Approved? Yes

By: Heins

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-05 Status: complete

Priority: High

Action Item Name: Emergency block valves be installed on hydrogen system

Action Item Description: Because of the hazards of hydrogen, it is recommended that emergency block valves be installed on the product transfer system.

Person(s) Responsible: Kolder, Roy

Expected Completion Date: August 15, 1995

Actions Recommended: Determine if the addition of EBV's will significantly reduce the risk of an event. Define needs based on this determination.

Actions Taken: Addition of EBV's will not significantly reduce the risk of an event. We are not even close to the "threshold" quantity that would warrant EBV's as per LPP 17.1.6.C.2. Buck Bailey (LAD Safety & Loss Prevention) concurs with this reasoning. No further action is required per Buck and Steve Tedeschi.

Note: ECD did not provide enough time to sufficiently address the recommendation.

Actual Completion Date: November 15, 1995

Closure Approved? Yes By: Heins

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-06

Status: complete

Priority: Must Do

Action Item Name: Need to conduct hydrogen trailer inspection

Action Item Description: A trailer inspection needs to take place on the hydrogen trailer by either the CA II personnel or someone at the Tank Truck Inspection station before being allowed on the highway. This may also be done by the carrier/driver at the CA II block.

Person(s) Responsible: Kolder, Roy

Expected Completion Date: March 30, 1996

Actions Recommended: Ensure that trailer inspection is defined in the operating procedures used for the hydrogen trailer.

Actions Taken: Updated CA II procedure and included a step requirement of reviewing the condition of the empty trailer with the carrier/driver, prior to leaving CA II.

Actual Completion Date: March 18, 1996

Closure Approved? Yes

By: Heins

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-07 Status: complete

Priority: Must Do

Action Item Name: Need training for personnel off-loading hazardous materials

Action Item Description: Each operator and supervisor of an area that off-loads DOT regulated hazardous materials, must be trained per DOT HM 126-F or work directly under (alongside) someone who is so trained. Training should occur within 90 days of being assigned the haz-mat job and recurrent training taking place every two years. The employee must also be tested, their training and testing documented, and the employee certified.

Person(s) Responsible: Landry, Donnie

Expected Completion Date: December 31, 1994

Actions Recommended:

Actions Taken: This action item was determined to be not applicable for CA2 per Dean Smith.

Actual Completion Date: December 20, 1994

Closure Approved? Yes By: Heins

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Print Date: Tue, Nov 26, 1996

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Action Item Register

Action Item #: DFA-08 Status: complete

Priority: Must Do

Action Item Name: When off-loading must be attended by qualified person

Action Item Description: Note that when a hazardous material is being off-loaded, the operation must be continuously attended by a qualified individual, who is awake, within 25 feet of the tank and with an unobstructed view. This person may be the operator or the driver, as long as they have been trained per HM 126-F.

Person(s) Responsible: Douglas, Charles

Expected Completion Date: June 30, 1995

Actions Recommended: Ensure that we explicitly document this in our off-loading procedures.

Actions Taken: The off-loading procedures address the need for continuous monitoring while off-loading.

Actual Completion Date: March 15, 1996

Closure Approved? Yes By: Heins

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Print Date: Tue, Nov 26, 1996

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