



Shell Oil Company
Interoffice Memorandum

OCTOBER 19, 1988

FROM: SR. STAFF ENGINEER, PRODUCTS HEALTH & SAFETY
TO: SEE ATTACHED DISTRIBUTION LIST
SUBJECT: HEALTH & SAFETY COMPLIANCE REVIEW REFERENCE SHEETS

740.1

HEALTH & SAFETY	
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PLAINTIFF'S EXHIBIT

SH-1726

The attached sheets dated March 7, 1988, are the most recent version of the reference used for the Head Office HS&E Health & Safety Compliance Assessment Reviews. The sheets attached have some key thoughts ("memory jobbers") to assist those doing the compliance review. This is a fairly recent addition to the sheets and serves as advance notice of items certain to be examined during formal reviews. In addition, it provides a useful resource for internal compliance audit programs.

Obviously it is not possible to list all possible items to be examined in either an external or internal audit. And, some requirements may not apply to certain locations.

These sheets are provided as a resource for your program. They are intended to be "evergreen" -- which suggests revisions may be coming soon to reflect recent regulatory revisions and additions.

K. C. Crawford
K. C. Crawford

KCC:bjd

Attachment

cc: J. L. Rivard

LAM 017913

DISTRIBUTION LISTHEAD OFFICE

L. V. CSENGERY, HS&E, MARKETING ENGINEERING, R&M
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H & S COMPLIANCE ASSESSMENT REVIEW - _____ REVIEWER _____ DATE _____
 ORGANIZATION _____ SEGMENT _____

TOPICS & REFERENCES STRENGTHS AREAS FOR IMPROVEMENT

INSPECTIONS & REVIEWS

- Previous Compliance Reviews - Shell Recommendations addressed and corrective actions completed?
- OSHA Citations/Correction - 1903.18 What is citation history (last 5 years)? Are corrections documented?
- Other Agencies - Various Any other agency citations in the last 3 years? Corrections documented?

ADMINISTRATIVE

- Compliance Resources
 - H&S CAR Manual - Shell Awareness? Available? Where? Responsible person designated?
 - Appropriate Standards - Shell What publications are available? Where? (e.g. OSHA 1910, 1926, DOT, MMS, etc.
 - Own Manuals - Shell Operating procedures, safety manuals, emergency procedures, etc. Used?
 - Responsibility Assigned - Shell Who implements new standards, updates procedures? Who is responsible for health & safety regulatory compliance?
- OSHA Poster - 1903.2 Are posters visible on "report to work" bulletin boards?
- Injury/Illness Records
 - BLS 86 Guidelines - BLS Are BLS guidelines available? Is record keeper aware of requirements?
 - Log & Summary - 1904.2 Does log conform to new BLS guidelines? Summary posted annually?
 - Case Reports - 1904.4 Are case reports available for recordable injuries?
 - Record Retention - 1904.6 Is five year requirement followed?
 - Fatal/Hosp. Reporting - 1904.8 Aware of OSHA reporting requirements?
- Access to Exp/Med Records - 1910.20 Posted, or informed annually? New employees advised? Records retained for 30 years or as required by specific regulation?
- Site Entry Procedures - Shell Available? Understood by management and gate/security personnel?

HAZARD COMMUNICATION

- Written Plan Available? Include "hazard determination" description?
- Substance List Available? Kept up-to-date?
- MSDS Available, current, and ready access by employees?
- Labeling Are containers/equipment/samples labeled?
- Training Have employees been trained - initial and upon new hazard?
- Shipments Procedure/labeling?
- Contractors Procedures to inform contractors in place? Do contractors have acceptable hazcom training and procedures in place? Who audits?
- State RTK Laws Does OSHA HCS Program meet state requirements too?

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>RESPIRATORY PROTECTION</u>		
• Needed • Resp. Protection Manual • Written Plan • Selection & Use • Training • Fit Testing • Respirator Maintenance • Breathing Air Quality • User Medical Status Review • Periodic Evaluation/Survey • Records • Personal Factors	- 1910.134 - Shell - Shell	Are respirators present on site? Are they needed? Why? Available? Used by whom? Responsible person designated? Available? Described in written plan? How accomplished in practice? Done? Documented? Done? Documented? Respirators inspected, maintained, cleaned, stored properly? Checked periodically? Documented? Done? Documented? Is program assessed annually? Are user activities monitored periodically? Are selection, fit testing, training, maintenance documented? In conformity with Shell Respiratory Protection Manual?
<u>HEARING CONSERVATION</u>		
• Needed • Employee Notice • Monitoring Data • Signs/Contour Maps • Hearing Protection • Training • Audiometric Testing • STS Follow-up	- 1910.95	Any noise sources? Sound levels known to be below the action level? Posted? Levels exceed 85 dBA? Last done when? Employees advised of results? Current? Areas posted? Provided? Worn in posted area? Done? Documented? Done if above 85 dBA? Employees advised of results? Managers advised of STS? Are employees informed? If STS occurs, is employee retrained?
<u>BENZENE</u>		
• Scope/Application • Exposure Monitoring • Regulated Areas • Written Plan • Signs/Labels • Training • Medical Surveillance • Marine	- 1910.1028	Known and documented? Overall plan developed? Initial monitoring completed? Results? Periodic monitoring done? Documente Established? Requirements followed? Compliance plan developed in writing (when PEL's exceeded)? Requirements followed? Requirements followed? Requirements followed? Apply? Employees protected? Regulated areas established on barges?

DPMC-11604

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>ASBESTOS</u>		
- Exposure Monitoring - Regulated Areas - Housekeeping - Signs/Labels - Personal Protection - Training - Medical Surveillance - Office Bldg Procedure - General Industry	- 1926.58 Areas/equipment with asbestos identified? Initial monitoring done and documented? Results? Established for "major" and "minor" work? Competent person designated? Adequate? Meet requirements? Requirements met? Protective clothing used when PEL exceeded? Completed? Documented? Requirements met? Aware of and follow procedure where applicable? - Shell - 1910.1001 Brake work done? Requirements of standard followed? - 1910.1025 Comply with standard? - 1910.1017 Comply with standard? - 1910.1047 Comply with standard? - 1910.1000 Aware of and comply with PEL's?	
<u>OTHER OSHA SUBSTANCE STANDARDS</u>		
- Lead - Vinyl Chloride - Ethylene Oxide - Other Toxics		
<u>INTERNAL STANDARDS</u>		
(CCL ₄ , ECH, EDB, DD, Alpha Olefins, CS ₂ , 2 butoxyethanol, 2 ethoxyethanol, 2 ethoxyethylacetate, 2 methoxyethanol, EO, CHCl ₃ , Radiation, nickel chloride, nickel oxide, nickel subsulfide)	- Shell Aware of and comply with Shell Internal Standards?	
<u>INDUSTRIAL HYGIENE MONITORING</u>		
- HS&E Monitoring Proced. - Strategy - Results	- Shell Aware of HS&E procedure? Monitoring strategy developed? Results evaluated and provided to employees?	
<u>VENTILATION REQUIREMENTS</u>		
- Ventilation Manual - Area or Room - Laboratory Hoods - Local Exhaust Systems	- 1910.94 Used where? OSHA requirements (grinding, spraying, open surface tanks) met? - Shell Ventilation manual available and used? Responsible person designated? - Shell Ventilation adequate? Periodically tested? Documented? - Shell Ventilation adequate? Periodically tested? Documented? - Shell Systems adequate? Periodically tested? Documented?	

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>HAZARDOUS WASTES</u>		
• Scope/Application • Compliance Plan • RCRA Operation (Para. o) • Emergency Response • Training	- 1910.120	Known and documented? Compliance plan developed and documented? RCRA permitted hazardous waste operation? Comply? Emergency response? Comply? Training completed and documented?
<u>WORK AUTHORIZATION SYSTEMS</u>		
• Lockout/Tagout • Hot Work • Confined Space Entry • Accident Prev. Signs/Tags	- Shell - Shell - Shell - 1910.145	Lock out/tag out procedure in place - mechanical, electrical? Procedure for authorizing hot work? Procedure for authorizing confined space entry? Tags conform?
<u>CONTRACTOR SAFETY/HEALTH</u>		
• Program Assessment	- Shell	Description of program in place? Effective?
<u>INTERNAL SELF-AUDITS</u>		
• Program Assessment	- Shell	System in place? What covered (press vessels, PRV's cranes/hoists, vehicles, small tools, etc.)? Follow-up?
<u>SHELL GUIDELINES/POLICIES</u>		
• Embryo-Fetus • Video Display Terminals (VDT) • Vehicular Safety Procedures • Seat Belts • Personal Flotation Devices • Lead/Chromate removal • Accident investigation • NFPA 30 tank overfill	- Shell	Aware of policy? Materials present? Female employees? Implemented? Aware of and follow guidelines? Users exceed 4 hours/day? Vehicular safety program? Aware of/follow Shell Drivers Handbook? Aware of Guideline? Enforced? Aware of Guideline? PFD's needed? Available? Used? Aware of guideline? Followed? Accident investigation system in place? Describe. Bulk tanks? Aware of requirements? Comply?

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>PROCESS SAFETY</u>		
• OSHA SSE • NJ TCPA • CA AB2185/3777	- OSHA Knowledgeable of OSHA SSE? Screening presentation pre-planned? - NJ New Jersey locations knowledgeable? Compliance plan in place? - CA California locations knowledgeable? Compliance plan in place?	
<u>OTHER PERSONAL PROTECTIVE EQUIPMENT</u>		
• Eye & Face Protection • Head Protection • Foot Protection • Other (Gloves, etc.)	(Must meet applicable ANSI standard.) - 1910.133 Made available when eye/face injury possible? Worn as required? - 1910.135 Made available when head injury possible? Worn as required? - 1910.136 Made available where foot injury possible? Worn as required? - 1910.132 Made available when hand/skin injury possible? Worn as required?	
<u>PRESSURE RELIEF VALVES</u>		
• Audit System • Documentation	- 1910.100(b) Are PRV's tested periodically? How often? Documented? Follow-up procedure?	
<u>ABRASIVE BLASTING</u>		
• Silica	- 1910.244 Nozzle have fail-closed manual valve? Ventilation requirements met? - 1910.1000 Comply with PEL for silica if sand used?	
<u>NON-IONIZING RADIATION</u>		
• Electromagnetic • Lasers	- 1910.97 Comply with standard? - State Any state requirements? Comply?	
<u>MEDICAL SERVICES/FIRST AID</u>		
• First Aid & CPR Training • Documentation of Training • F/A Supplies/Equipment • Eyewash/Shower Facil.	- 1910.151 Training done? All shifts covered? Refresher training provided? Training documented? Available? Maintained? Available? Tested periodically? Documented?	
<u>EMPLOYEE EGRESS</u>		
• Exit signs/maps • Written Plan Needed	(Subpart E) Exits - adequate, identified, unobstructed, illuminated? Fire detection, alarm, sprinkler systems inspected and maintained? Emergency lighting - 1910.38 Written plan needed? Adequate?	
<u>FIRE PROTECTION</u>		
• Fire Brigade • Training • Equipment Audits • Documentation	(Subpart L) Applicable? Written organization statement? Physical capability established? Brigade members trained? Employees trained on use of fire extinguishers? Extinguishers inspected monthly and maintained annually? Training, equipment inspection, physical capability documented?	

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>WALKING/WORKING SURFACES</u>	(Subpart D)	Housekeeping adequate? Openings protected? Floor loading posted? Open sided floors, platforms have railings, toe boards?/Stair tread in good condition? Stair railings?/Ladders in good condition? Inspected regularly? Tied off?/ Scaffolds in good condition? Railings and toe boards? Safety belts used?
- Scaffolding - Ladders - Other		
<u>FORK TRUCKS</u>	- 1910.178	
- Operator Training - Documentation		All operators trained? Periodic refresher training? Training documented?
<u>CRANES & HOISTS</u>	- 190.179	
- Inspections - Certification/Documentation - Rated Load Marking		Inspected according to OSHA requirements? All inspected? Inspections documented? Cranes certified? Rated load marked on crane?
<u>MACHINE GUARDING</u>	(Subpart O)	Moving equipment guarded? 1/8" clearance on grinders? Auto start equipment posted?
<u>WELDING</u>	- Shell - 1910.252 - 1910.252	Awareness of manual? Responsible person designated? Ventilation meet requirements? Electrical arc welders for grounding, etc.? Condition of leads ok?
<u>HAZARDOUS MATERIALS</u>	(Subpart H)	Cylinders secured? Pressure relief device maintained? Flammables stored properly? Adequate fire control equipment? Ignition sources controlled? Grounding adequate?
<u>MATERIALS HANDLING</u>	(Subpart N)	Aisle adequate and clear? Housekeeping good? Elevated storage racks in good condition? Allowed loadings known and posted?
- Aisles/Housekeeping - Elevated Storage - Railroad Cars		
<u>ELECTRICAL SAFETY</u>	(Subpart S)	Circuit boxes, electric panels labelled? Equipment grounded? Grounding tested?
- Labeling - Grounding - Access		

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80911-CMD

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
<u>MARINE TERMINALS</u>	- 1917	Apply? See specific guidance letter.
<u>LONGSHORING</u>	- 1918	Apply?
<u>DOT REQUIREMENTS 49 CFR</u>	- Shell	Manual being followed? Employees trained? Training documented?
. Hazardous Material Manual		Haz material tariff available?
. Rail car unloading/loading		Cars inspected before loading? Flammables grounded properly?
- inspection		Grounding screw clamps operable?
- bill of lading/placards		Cars properly placarded? Label or MSDS for Hazcom?
- blue flags/derailers		Used when cars loading/unloading.
- car inspections documented		
. Truck unloading/loading		Inspected prior to loading? Documentation? Flammables grounded?
- inspection		Truck properly placarded? Label or MSDS for Hazcom?
- bill of lading/placards		Brakes set and wheels blocked? Truck attended during loading/unloading?
- Other		Truck meet DOT noise regulations?
. Driver qualifications		Drivers qualified - physical exam (2 years), annual review of driving record? Aware of new DOT requirements? Single state drivers license?
. Pipeline records		Pipelines regularly inspected? Leak reports filed? Emergency procedure available? Public warning signs exist? Public education programs?
<u>USCG REQUIREMENTS</u>	33 CFR	Approved manual available? USCG approval available? Employees trained?
. Artificial islands	46 CFR	Available?
. Vessels/MODU	33 CFR	Done? Documented?
. Waterfront facilities		Done prior to cargo transfer? Documented?
- Operations Manual		Life protection devices available? In good repair?
- Hot Work Permit		Cargo hoists inspected? Documented? Emergency response procedures?
- Hose Pressure Tests		Training? Communication system between vessel, dock and tank farm available?
- Vessel Inspection		
- Life Saving Devices		
- Other		

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TOPICS & REFERENCES	STRENGTHS	AREAS FOR IMPROVEMENT
MMS REQUIREMENTS 30 CFR	Questions in Compliance Manual.	
Outer Continental Shelf Orders		
BLM REQUIREMENTS 43 CFR	Questions in Compliance Manual.	
- Onshore Orders - H₂S contingency plan		
ATF REQUIREMENTS 27 CFR	Questions in Compliance Manual.	
- Alcohol - Explosives		
FAA REQUIREMENTS 14 CFR	Questions in Compliance Manual.	
- Pilot certification - Aircraft certification - Maintenance Certification		
NRC REQUIREMENTS 10 CFR		Licensed facility? License current? State regulations being followed? Users properly trained? Sources properly identified? Inventory control in place & working? Monitoring conducted? Results provided to employees? Contractors comply with regulations? Properly control sources?
STATE & LOCAL		
- Boiler Inspection Cert. - Boiler Operator License - Water Heaters - Elevator Inspection Cert. - Food Handling Cert. - Emergency Plan	Inspection required? Up-to-date? Operator licensing required? Up-to-date? Pressure relief valve? Required? Up-to-date? Required? Up-to-date? Meet local requirements?	
MISCELLANEOUS		
- Air Receivers - Compressed Air Cleaning - Food in Workplace		All requirements met, including need for PRV? Aware of OSHA requirements? 30 psi criteria met? Any food/beverages allowed in areas where toxic materials are handled?