



1994 CHLOR-ALKALI II CONSOLIDATED AUDIT

AUDIT RECOMMENDATIONS AND ACTION PLAN DATABASE

*"This book is to reside in the Safety Compliance Checklist Files (Old C-9)
and to be removed with the Safety & Training Coordinator's approval only."*

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APPENDIX A. SAFETY QUESTIONNAIRE

DIVISION:
PLANT/DEPARTMENT:
BUILDING:
REVIEW DATE/TIME:

LOUISIANA
CA 4
3601
11/3/99 - 9-

SAFETY AUDIT TEAM

Safety Superintendent/Director/Engineer:
Safety Functional Team Leader:
Process S&LP (Audit) Specialist:
Technology Center Representative:

RODDEY PEEBLES
DAN SPANES
HOWARD KILKINSON
BILL COOK

Other Audit Team Members:

SAFETY AUDITEES

Superintendent/Department Head:
Plant/Department Personnel:
Major Manager:

GRETCHEN LEBLANC
DANNY LANDRY
TERRY LEIGH

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APPENDIX A. SAFETY QUESTIONNAIRE

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APPENDIX A. SAFETY QUESTIONNAIRE

Question Identification for a Limited Audit:

A = Dow rule or regulation

B = Good practice/training

C = Hazard Analysis

A-1. PROGRAM STRUCTURE AND PLANNING

- B 1. Describe your plant/department safety organization. Include its relationship with the overall organization. (List teams and committees.)

(1) SAFETY/IH COORDINATE OR CHAIR MTO.
(2) REPRESENTATIVE FROM EACH WORK GROUP

Team/ Committee	Composition	Freq. of meetings	Minutes Published	Pre-pub. Agenda	Pre-Est. Charter
yes	1 ea. work Group DAY Tech.	QTR.	yes	yes	yes

- B 2. Does the Superintendent/Department Head show visible support/ involvement for safety (policy, communications, letters to employees, intervention, MBWA, etc.)? Yes ☒ No ☐

If yes, provide several examples.

PARTICIPATES IN INCENTIVE PROGRAM - ACTIVELY

- B •Are safety expectations defined?

Yes ☐ No ☒

HAVE VERBALLY STATED EXPECTATION

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APPENDIX A. SAFETY QUESTIONNAIRE

- A •Are there consequences for non-compliance with safety rules and procedures? Yes ☒ No ☐
If yes, provide several examples. DEFINED IN JPR'S
-
- B 3. Do the safety committee and/or natural work teams have mission statements? Yes ☒ No ☐
If yes, please attach.
- A 4. Do employees attend safety meetings on a regular basis? Yes ☒ No ☐
- B •Are meetings held at least monthly? Yes ☐ No ☒
- B quarterly? Yes ☒ No ☐
- A •Is there documentation of the meeting showing content of the meeting, name of the instructor, and who attended? Yes ☒ No ☐
- B •Is there a mechanism to insure 100% participation or follow-up on safety meetings? Yes ☒ No ☐
- B •Is documentation being kept for 3 years? Yes ☒ No ☐
- A 5. Do safety objectives, goals, plans exist in written form for your plant/department? Yes ☒ No ☐
- B •Who developed the OGP's? JOINT EFFORT BETWEEN STAFF'S SAFETY REPRESENTATIVE.
- B •How are they measured? MONTHLY DATA - UPDATES ON PERFORMANCE
- B •How often is the status reviewed? Past Monthly - Q/R SAFE MEETS.
- B •Is your reward/recognition tied to the achievement of your OGP's? Yes ☒ No ☐
- B 6. Do you use SPIP (Safety Performance Improvement Process) or DSIS (Dow Safety Improvement System) to evaluate your safety program? Yes ☒ No ☐
If no, then describe what you are using.
-

APPENDIX A. SAFETY QUESTIONNAIRE

- C 7. Is there a written suggestion system in effect for safety suggestions?
USCR/PRO ACTIVE REPORTS Yes ☒ No ☐
- C If yes, how are suggestions followed up? Flow Chart, Time Limits, Reports, File Make Pro, Follow-up Status monthly
- B •What is the normal response time? 7 DAYS
- B •What percent of employees participate in your suggestion program?
100% 71% - '93 } USCR
44% - 4TD '94 }
- B 8. Do you have a safety recognition system? Yes ☒ No ☐
- B 9. Do you communicate safety information? Yes ☒ No ☐
If yes, what methods do you use?
Bull. tin Board, Documented, SAFETY MTG.
IN FORMAL MTG.

A-2. EMPLOYEE PARTICIPATION

Reference: "Dow Minimum Requirements", and OSHA 1910.119 (C)

- A 1. Do you have a process to assure that each individual clearly understands his/her responsibility for safety (new employee orientation, safety meetings, annual one-on-one performance reviews, etc.)? Yes ☒ No ☐
- B 2. Are annual personal safety goals required for employees? Yes ☒ No ☐
- A 3. Have employees been informed of their responsibility to report hazards and injuries to their immediate supervisor in a timely manner? Yes ☒ No ☐
- A 4. Do employees participate in plant/department safety programs or activities as outlined in List 2 on page 19 of this questionnaire? Yes ☒ No ☐

APPENDIX A. SAFETY QUESTIONNAIRE

- A A. Are employees consulted with on conducting and developing process hazard analyzes such as outlined in List 1 page 19 of this questionnaire? *35 % of test-active* Yes ☒ No ☐
- A B. Are employees consulted with on the development of other PSM Elements as outlined in List 3 on page 20 of this questionnaire? Yes ☒ No ☐

A-3. CONTRACTOR SAFETY

REFERENCE: "Dow Guidelines for a Contractor Safety and Loss Prevention Program" and OSHA 1910.119 (H)

- A 1. Are contractors given plant specific safety orientation covering known potential for fire, explosion, or toxic release hazards? Yes ☒ No ☐
- B 2. Do contractor supervisors attend and conduct contractor safety investigations? Yes ☒ No ☐
- B •Does a Dow representative attend also? Yes ☒ No ☐
- B •Are contractor incidents documented and tracked to completion? Yes ☒ No ☐
- A 3. Is contractor safety performance audited during jobs in your plant? Yes ☒ No ☐
- B If yes, how is it audited?
Permit/Red Tag, BEHAVIOR BASE
SAFETY OBSERVATIONS
- A 4. Are pre-job safety meetings held prior to on-site contractor activity? Yes ☒ No ☐

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APPENDIX A. SAFETY QUESTIONNAIRE

- B 5. Do "service" contractors (i.e., computer, telephone, copier, air conditioning, etc.) receive safety training? Yes ☐ No ☒
- A 6. ^{- OUTSIDE WORK REQUIRE PERMIT}
^{- INSIDE (COMPUTER COPIER) NO INDICATION}
Is safety information and process changes shared with affected contractors? ^{JOB PLANNING} Yes ☒ No ☐
- A 7. Are contract employees informed of the plant/department emergency plan? Yes ☒ No ☐
- A 8. Do you assure that contract maintenance people are adequately trained? Yes ☒ No ☐
- A 9. Are contract employees provided access to plant process hazard analysis on request? Yes ☒ No ☐
- A 10. When selecting contractors do you obtain and evaluate information regarding that contractors safety performance and programs? (site). ^{Eng. Project.} Yes ☒ No ☐
- A 11. Do you maintain a contractor injury/illness log related to work covered by the PSM standard? ^{Not in Block} Yes ☐ No ☒

A-4. ACCIDENT/INCIDENT INVESTIGATION AND REPORTING

REFERENCES: "Dow Guidelines for Accident Investigation" and "Dow Guidelines for S/LP/S Reporting", Division Safety Standard and OSHA 1910.119 (M)

Accidents and incidents involving or having significant potential for causing personal injury, property damage or loss, business interruption and all crimes or fraud against the Company shall be promptly investigated. Each incident shall be thoroughly analyzed and a corrective action plan implemented. Appropriate communications shall be made to Management and to all involved parties.

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APPENDIX A. SAFETY QUESTIONNAIRE

	199__		199__		199__ YTD	
Type Incident	Dow	Contractor	Dow	Contractor	Dow	Contractor
DAWCs						
RWCs						
RMTCs						
Total OSHA recordables						
OSHA Incident Rate						
Total Injuries (first aid included)						
Near-Misses - PSA						
Others (Define)						
Spills & Leaks						
Process Safety Incidents						
Env. Incidents						
Motor Vehicle						

A 1. Do you have a notification procedure for accidents or incidents within your facility? Yes ☒ No ☐

A 2. Do you have a process for investigating accidents/incidents? Yes ☒ No ☐

B •Who participates? Follow S-305

A •Are contractor employees included in the investigation team if the incident involved the work of the contractor? Yes ☒ No ☐

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APPENDIX A. SAFETY QUESTIONNAIRE

B •Does your process include root cause or ice link analysis?
Some Root Cause Yes ☒ No ☐

A •Are all incident investigations initiated within 48 hours following the incident? Yes ☒ No ☐

A 3. Is there a system in place to assure completion of corrective action within the specified recommended time? Yes ☒ No ☐

B •What is the percent completion of corrective actions by the commit date? _____ %

A 4. Are incident findings and corrective actions communicated to affected workers via an incident investigation report? Yes ☒ No ☐

A •Are communications documented? Yes ☒ No ☐

B 5. Do you encourage the reporting of near-miss type incidents? Yes ☒ No ☐

A-5. AUDITS

REFERENCE: "Dow Guidelines for Safety, Loss Prevention and Security Audits", "North American Consolidated Audit Process" and OSHA 1910.119 (O)

C 1. Are internal audits or inspections conducted (sight glasses, expansion joints, housekeeping, guarding, mock OSHA, emergency signals, eye showers, etc.) ? Yes ☒ No ☐

B •If yes, who conducts audits? EVERY ONE IS ASSIGNED

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APPENDIX A. SAFETY QUESTIONNAIRE

- A 2. Do you have a process in place to assure compliance with Safety Standards and Minimum Requirements (TX - SR #14, LA - C9, MI - S-005)? Yes ☒ No ☐

If yes, please describe. SAFETY COORD. REVIEW C-9
(2-3 WEEK REVIEW)

- A •Are there any exceptions/variances? Yes ☒ No ☐

B If yes, please describe. Blocks/Stops on Relief Devices.

- A 3. Has your plant had an audit for compliance with Process Safety Management (PSM) Standards in the last 3 years? (Consolidated Audit) Yes ☐ No ☒

Date of last Consolidated Audit: _____

- A 4. Are audit findings documented? Yes ☐ No ☐

- A •Are corrective actions accomplished? Yes ☐ No ☒

- A •Are corrective actions documented? Yes ☒ No ☐

- A •Are corrective actions communicated? Yes ☒ No ☐

- B 5. Is management informed of appropriate audit findings? Yes ☒ No ☐

6. Do programs exist for inspecting the following:

- B •The use of quick opening valves on "end of the line service"? Yes ☐ No ☒

- B •Open ended lines capped and plugged? Yes ☐ No ☒

- B •Cross connections between utility lines (i.e., N₂ to air)? Yes ☐ No ☒

- B •Cross connections between process and service or utility lines (i.e., service water and caustic)? Yes ☐ No ☒

USE AIR TO Blow out process and ash
N₂ set-up to protect Back Flow

APPENDIX A. SAFETY QUESTIONNAIRE

- B •Backflow preventers tested and maintained? Yes ☐ No ☒
- C •Field hazard identification? Yes ☒ No ☐

A-6. SAFE WORK PRACTICES

Safe Work Permits

REFERENCE: "U.S. Area Standard #4"

- A 1. Are safe work permits used for all jobs in the process area? Yes ☒ No ☐

B If no, please explain. Some Service Groups may not
get a permit.

- A 2. Are on-site inspections done for each permit? Yes ☒ No ☐

B If no, please explain. _____

- A 3. Is training provided for the use of safe work permits? Yes ☒ No ☐

- B 4. Do you monitor safe work permits for accuracy and completeness? Yes ☒ No ☐

- A 5. Are annual performance audits conducted? Yes ☐ No ☐

B •How are deviations handled? CA II PERM. + AUDIT
FORM used Monthly

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APPENDIX A. SAFETY QUESTIONNAIRE

Hot Work Permits

REFERENCE: "U.S. Area Standard #4", OSHA 1910.119 (K) and OSHA 1910.252(A)

- A 1. Do you have a plant procedure for hot work? Yes ☒ No ☐
- B •Who can perform hot work in the plant? QUALIFIED MAINT. CRAFT.
- A 2. Are hot work permits issued for all hot work operations in or near the process? Yes ☒ No ☐
- A 3. Is authorization of hot work preceded by site inspection and designation of appropriate precautions? Yes ☒ No ☐
- B •Who can authorize hot work? PERMIT WRITERS
- B •What training is necessary? O₂/Comb. & PERMITS-US. AREA STDS.
- A 4. Are areas requiring a hot work permit identified? Yes ☒ No ☐
- A •Has management established areas and procedures for safe welding and cutting based on fire potential? Yes ☒ No ☐
MORE Consideration given in H₂, O₂ Cell, GENERATOR-H₂ AREAS
- B 5. Are employees trained to identify sources of ignition? Yes ☒ No ☐
- B 6. Do you require a fire watch on all hot work jobs? Yes ☐ No ☒
- A •Have fire watch personnel completed fire extinguisher training? Yes ☒ No ☐
- B 7. Do you have a procedure for hot work if the fire protection system is down? Yes ☐ No ☒
Do not do any Hot work if Sys is Down
- B 8. Do you have procedures and training for powder activated devices (Hilti guns, etc.)? Yes ☐ No ☒

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APPENDIX A. SAFETY QUESTIONNAIRE

- B 9. Are permits retained until completion of hot work operations? Yes ☒ No ☐
- B 10. Are permits audited on a regular basis? Yes ☒ No ☐

Line and Equipment Opening

- B 1. Have you categorized your line openings and addressed the minimum protective equipment for each? Yes ☒ No ☐
- B 2. Are line opening tie points initialed by operations and maintenance? Yes ☒ No ☐
- B 3. For routine line openings, do written procedures exist in lieu of writing permits. Yes ☐ No ☒
- B 4. Is training provided on line and equipment opening? Yes ☒ No ☐

- A •Is training documented? *PROCEDURE REVIEWS* Yes ☒ No ☐ *Documented*

Confined Space Entry

REFERENCE: "U.S. Area "Standard #5" and 29CFR 1910.146

- A 1. Do you have a plant procedure for confined space entry? Yes ☒ No ☐
- B 2. Who can authorize a confined entry permit? *List Developed and Posted in permit office & R.F. C. Perry*
- A •What training is required to authorize a permit? *Completed all Training in Standard, SOS and above course But all employees were trained on Standard.*
- A •Do you have documentation of training? Yes ☒ No ☐
- A 3. Is basic and plant training given to employees who use the explosimeter/oxygen analyzer? Yes ☒ No ☐

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APPENDIX A. SAFETY QUESTIONNAIRE

- A 4. Do confined space rescue procedures exist in written form for designated confined spaces? - *Utilize Security* Yes ☐ No ☒
- B •Are employees trained in rescue techniques? Yes ☐ No ☒
- A 5. Are there any variances to the confined space standard? Yes ☒ No ☐
If yes, please describe.
- *Double Block & Bleed, Rescue Air on site, Air Mover where not practical.*
- A 6. Is training provided for safety observers? Yes ☒ No ☐
- A 7. Are annual performance audits conducted? Yes ☐ No ☒
- B •How are deviations handled? _____

- A 8. Are permits retained one year after completion of job? Yes ☒ No ☐
- A 9. Are permits posted at entrances are they made available to entrants? Yes ☒ No ☐
SAFETY ATT. Keeps Copy.

Lockout and Tagout Procedures

REFERENCE: "U.S. Area Standard #3" and 29CFR 1910.147

- C 1. Are there any areas where the concept of exclusive control is used? Yes ☐ No ☒
B If yes, please describe them. _____

- A 2. Are plant employees trained and is the training documented? Yes ☒ No ☐
- A • Is the training documented? Yes ☒ No ☐

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APPENDIX A. SAFETY QUESTIONNAIRE

- B 3. Who is responsible for locking and tagging equipment? OPERATIONS
PERSONNEL
- A 4. Are annual performance audits conducted? Yes ☐ No ☒
- B •How are deviations handled? _____
- A 5. Are there any variances to this standard? Yes ☐ No ☒
If yes, what steps were taken? _____
- B 6. Is there a central location for communication of lockout/tagout?
Yes ☒ No ☐
- B 7. Have there been any incidents due to improper lockout/tagout?
Yes ☒ No ☐
- B If yes, please describe. IMPROPER USE Auto VALVE (EBU)
prepped improperly.
- A 8. Do you have lockout/tagout procedures for all major pieces of
equipment? Yes ☒ No ☐
- A •Are they kept up to date? Yes ☒ No ☐

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APPENDIX A. SAFETY QUESTIONNAIRE

Guarding and Interlocking

REFERENCE: Dow "Minimum Requirements"

- A 1. Do you have a program in place to assure that all guards are replaced before ex-
Prior to use after J.O.B.V. Yes ☒ No ☐
- B 2. Do interlocks play an important role in protecting employees?
Red Tagging or Lock out Tag out. Yes ☐ No ☒

Fall Protection

REFERENCE: U.S. Area Standard #6

- A 1. Have employees been trained in fall prevention equipment use?
Yes ☐ No ☒
- A 2. Have you identified areas where fall prevention is necessary and required?
Yes ☒ No ☐
- A 3. Are there any variances to this Standard.
If yes, please describe. *N/A*

- A 4. Do you have a policy regarding roof access?
SELF REF. Yes ☐ No ☒
- A 5. Are annual performance audits conducted? Yes ☐ No ☒
- B •How are deviations handled? *N/A*

A-7. EMERGENCY PLANNING AND MEANS OF EGRESS

REFERENCE: "Dow Guidelines for Emergency Planning", OSHA 1910.119 (N)

- A 1. Do you have a plant/department emergency plan? Yes ☒ No ☐
- B •Does the plan include in-place sheltering? Yes ☒ No ☐

APPENDIX A. SAFETY QUESTIONNAIRE

- A 2. Are plant/department emergency plan drills conducted? Yes ☒ No ☐
- B •Have local emergency crews participated in drills? (See page on fire fighting in Loss Prevention section.) Yes ☐ No ☒
- B •Does each employee participate in at least one hypothetical emergency each year? Yes ☒ No ☐
- A •Are deficiencies corrected and communicated? Yes ☐ No ☒
- A •Are changes made and communicated? Yes ☐ No ☒
- A 3. Do new employees receive emergency plan information? Yes ☒ No ☐
- B 4. Is the emergency plan information communicated to visitors? Yes ☒ No ☐
- B 5. Are there at least two ways out from all process areas? Yes ☒ No ☐
- A 6. Do exit doors open in the direction of travel from more hazardous to less hazardous areas? Yes ☒ No ☐
- A 7. Are bump bars provided on exit doors for areas which could have more than 50 people? Yes ☒ No ☐

A-8. EMPLOYEE TRAINING

Reference: "Dow U.S.A. Operating Training Standard", OSHA 1910.119 (G)

- A 1. Is training provided for supervision involved with hazardous chemicals? Yes ☒ No ☐
- A 2. Is training provided for maintenance staff involved with hazardous chemicals? Yes ☒ No ☐
- A 3. Is training provided for operating personnel involved with hazardous chemicals? Yes ☒ No ☐

APPENDIX A. SAFETY QUESTIONNAIRE

- A Initial ? Yes ☒ No ☐
- A Refresher ? Yes ☐ No ☐
- A •Do you have a list of skills and knowledge required for each operating job? Yes ☒ No ☐
- Does training for operating personnel include:
- B -Use of check-off lists? Yes ☒ No ☐
- B -Supervisory involvement? Yes ☒ No ☐
- B -Experienced operator involvement? Yes ☒ No ☐
- B -Written testing? Yes ☒ No ☐
- A -Up-to-date operating procedures? Yes ☒ No ☐
- A -Emergency procedures? Yes ☒ No ☐
- A -Reactive chemicals training? Yes ☒ No ☐
- A -Safety Standards? Yes ☒ No ☐
- A -Step for each operating phase? Yes ☒ No ☐
 Initial startup, normal operations, temporary operations,
 emergency shutdown, emergency operations, normal shutdown,
 and startup following a turnaround or emergency shutdown
- A -Operating limits? Yes ☒ No ☐
- A Consequences of deviations and steps required to avoid deviations. *yes* ☒ No ☐
- A -Safety and health considerations? Yes ☒ No ☐
- A Properties and hazards of chemicals used and precautions for preventing exposure. Yes ☒ No ☐
- A -Safety systems and their functions? Yes ☒ No ☐
- A •Is there Written certification in lieu of documentation for employee involved in operation the process before 5/26/92? Yes ☒ No ☐
- A 4. Is refresher training given? Yes ☒ No ☐
- B If yes, how often?
3 years

APPENDIX A. SAFETY QUESTIONNAIRE

- A •Have the employees operating the process been consulted? Yes ☒ No ☐
- A 5. Do you have a post-training evaluation for new employees? *Test* Yes ☒ No ☐
- A 6. Do temporary employees receive training? Yes ☒ No ☐
- A 7. Are plant superintendents and technical employees new to a plant trained in details of the process? Yes ☐ No ☒
- A 8. For PSM initial training include:
•Overview of process and operating procedures. Yes ☐ No ☒
•Specific safety and health hazards. Yes ☐ No ☒
•Emergency operations including shutdown. Yes ☐ No ☒
•Safe work practices applicable to job task. Yes ☐ No ☒
- OPERATING TRAINING List*
- A 9. Is there a record documenting traioning for PSM? Yes ☒ No ☐

A-9. SAFE OPERATION OF MOTOR VEHICLES AND MOTORIZED HANDLING EQUIPMENT

- B 1. Is driver's training provided? Yes ☐ No ☒
- A 2. Is powered industrial truck training conducted? Yes ☒ No ☐
- B •What types of powered industrial trucks do you use? Fork Trucks
3 Aerial Lift
- B •Where is fuel stored? NO
- A 3. Is documentation of training kept? Yes ☒ No ☐
- A 4. Is Daily Inspection documentation maintained? Yes ☐ No ☒
- A If yes is it current (daily)? PTU Yes ☐ No ☒

APPENDIX A. SAFETY QUESTIONNAIRE

A 5. Are employees trained in the plant rules and regulations? Yes ☒ No ☐

B 6. Is truck tractor training provided? Yes ☐ No ☒

B •Do you have vehicles which require the operator to have a commercial driver's license? Yes ☐ No ☒

B If yes, please describe. _____

B 7. Do you use manlifts, baskets or beam extenders on your fork truck? Yes ☐ No ☒

B •Have you considered the reduced capacity of the unit when using these items? Yes ☐ No ☒

A-10. OFF-THE-JOB SAFETY

B 1. Is there a formal program for reporting of off-the-job injuries to Dow personnel? Yes ☒ No ☐

B 2. Are the results of Dow employee off-the-job injuries collected and published for learning value? Yes ☒ No ☐

B 3. Are off-the-job statistics and learning situations utilized in plant safety meetings or discussions? Yes ☒ No ☐

B 4. Are off-the-job programs made available to employees' families (e.g., defensive driving)? Yes ☒ No ☐

B 5. Are safety communications mailed to employees' homes? Yes ☐ No ☒ *Division Program*

B 6. Are off-the-job, home activity topics, etc., covered in safety meetings? List some of your most successful "off-the-job" oriented safety meeting topics. Yes ☒ No ☐

*Boating, Hunting, Fire Prot.,
Chain Saw, Swimming, Home
Maintenance*

APPENDIX A. SAFETY QUESTIONNAIRE

A-11. PROCESS SAFETY MANAGEMENT LISTS

LIST 1

- *Fire and Explosion Index and Risk Analysis
- *Chemical Exposure Index and Risk Analysis
- *Reactive Chemical Reviews and Risk Analysis
- *Project Reviews (Safety, Health, Environmental, and Loss Prevention Reviews)
- *Technology Center Reviews
- *Insurance Inspections (Dow and Outside)
- *Consolidated Audit Questionnaire ✓
- *Process Hazard Analysis Section
- *Process Control Reviews (MOD Computer Reviews) ✓
- *HAZOP ✓
- *Warehouse Risk Analysis
- *Other Qualitative and Quantitative Risk Assessments

LIST 2

- *Safety Committees ✓
- *Safety Advisory Group
- *Safety Meetings ✓
- *Consolidated Audit Participation ✓
- *Project Review ✓
- *Pre-Start up Audits ✓
- *Incident Investigation ✓
- *Hazard Identification/Safety Suggestion ✓
- *Emergency Drills ✓
- *Safe Work Procedures ✓
- *Management Of Change ✓
- *Process Hazard Analysis
(Reactive Chemical Review, F&EI, CEI)

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APPENDIX A. SAFETY QUESTIONNAIRE

A-11. PROCESS SAFETY MANAGEMENT LISTS

LIST 3

- (c) Employee Participation ✓
- (d) Process Safety Information ✓
- (e) Process Hazard Analysis
- (f) Operating Procedures ✓
- (g) Training ✓
- (h) Contractors ✓
- (i) Pre-start Safety Review ✓
- (j) Mechanical Integrity ✓
- (k) Hot Work Permit ✓
- (l) Management of Change ✓
- (m) Incident Investigation
- (n) Emergency Planning and Response ✓
- (o) Compliance Audit ✓
- (p) Trade Secrets

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LAD CAUSTIC 1
1994 CONSOLIDATED AUDIT ACTION STEPS

	RECOMMENDATION	RESPONSIBILITY	ECD	ACD	Action Taken	Reason for Overdue?
	OCCUPATIONAL HEALTH AUDIT					
1	Clean refrigerator in control room and microwave in warehouse	Lemelle/Spears	2/24/94	2/23/94	Refrigerator and microwave were cleaned	N/A
2	Label degreaser vat and post MSDS	Boudreaux	2/24/94	2/24/94	Done as stated.	N/A
3	Unlabeled 5 gallon container at degreaser	Boudreaux	2/24/94	2/24/94	Done as stated.	N/A
4	Unlabeled containers in oil storage	Boudreaux	3/1/94	4/6/94	Done as stated.	More time needed than allotted to complete task.
5	Add lab and supply chemicals to hazard chemical list in Hazcom Manual	Douglas	4/30/94	4/4/94	Done as stated.	N/A
6	Review Plant Hearing Protection program	Douglas	4/30/94	5/16/94	Program reviewed.	More time needed than allotted to complete task.
7	Cleaning supplies needed at respirator cleaning station	Boudreaux	4/10/94	4/1/94	Done as stated.	N/A
8	Conduct a respirator effectiveness inspection	Sumly	6/1/94	6/1/94	Done as stated.	N/A
9	Maintain hood certification in old lab	Boudreaux	6/1/94	3/15/95	Laboratory hood certification will be maintained only if the hood is put back in service.	More time needed than allotted to complete task.
10	Repair leak on sandblasting cabinet	Boudreaux	6/1/94	7/1/94	Done as stated.	Submitted as a routine maintenance work request. Due to maintenance backlog, action item not completed by ECD.
11	Welding rod container have no hazard warning label	Boudreaux	6/1/94	5/30/94	Done as stated.	N/A
12	Vacuum ledge under gasket storage area	Boudreaux	5/1/94	4/5/94	Done as stated.	
	REACTIVE CHEMICAL AUDIT					
13	Survey user plants	Harrison	6/1/94	6/1/94	Done as stated.	N/A
	HAZARDOUS MATERIALS TRANSPORTATION REVIEW (HMTR)					
14	Loader within 25' of the truck (In the Procedure)	Butler	5/1/94	5/31/94	Done as stated.	More time needed than allotted to complete task.
15	No "Caution Signs" at TC rack entrance	Yelverton	5/1/94	6/13/94	Done as stated.	Signs took longer to make than anticipated.
16	Grease "Chick-san" swivel joints	Yelverton	2/18/94	2/18/94	Done as stated.	N/A
17	Spill containment at Tank Car Loading area	Heins	1995-96	6/1/94	No action will be taken in the foreseeable future. No mandatory environmental requirements exist. We've been able to historically manage spill potential via operating discipline. This has no economic driver.	N/A
	LOSS PREVENTION					
	ELECTRICAL					
18	Electrical Emphasis group recommendations	Heins	1995-96	11/27/96	Duplicate recommendation. See Electrical Reliability Audit section below.	N/A
19	MCC upgrade	Heins	1995-96	11/27/96	Duplicate recommendation. See Electrical Reliability Audit section below.	N/A
20	Evaluate upgrade of smoke detector system in MCC in control room	Boudreaux	12/31/94	9/22/94	Smoke detectors not added. This is a risk management issue.	N/A
	CRITICAL INSTRUMENTS					

LAD CAUSTIC 1
1994 CONSOLIDATED AUDIT ACTION STEPS

	RECOMMENDATION	RESPONSIBILITY	ECD	ACD	Action Taken	Reason for Overdue?
21	Review "Fail Safe" plant valves and EBV's	Pankow	6/1/94	9/1/95	Some of the automatic valves were reviewed and documented. We will update as needed per the MOC process.	More time needed than allotted to complete task.
	STORAGE TANKS					
22	Review tank overflow and vent lines	Butler	5/31/94	4/29/94	Done as stated.	N/A
	PRESSURE VESSELS / RELIEF DEVICES					
23	PSV design and documentation records	Pankow	12/31/94	3/16/95	Responsibility for updating relief design calculations/documentation was assumed by plant engineering and completed as required by Division goals.	Ownership of action item transferred to Engineering department. ECD no longer valid.
	FIRE PROTECTION					
24	Develop a plan for each group for a worst case fire scenario	Boudreaux	6/30/94	6/17/94	Developed/conducted drills on this scenario and performed one drill per shift on the worst case fire scenario.	N/A
	PROJECT PREVIEWS					
25	Pre-start up action steps to be documented, closed and verified	Boudreaux / Sumly	On going	On going	Handled through the MOC process - at a level 6 per Operating Discipline	N/A
	ELECTRICAL RELIABILITY AUDIT					
26	No 1 hour fire barrier in control room MCC's	Heins / Pankow	3/31/97		Re-evaluate options during next electrical reliability audit.	Need to evaluate real risk. Did not get to problem solution and cost phase.
27	South MCC does not have 24" min. clearance	Heins / Pankow	3/31/97		Cannot physically alter the wall without great expense. Re-evaluate options via next electrical reliability audit.	Spent extra time trying to determine alternate plan. A new MCC could not be justified.
28	Doors do not have panic hardware and some open inward	Pankow	6/1/95	6/1/95	All doors adjusted to open outward. No panic hardware installed (not required).	N/A
29	No smoke detectors in switch gear	Boudreaux	12/31/94	9/22/94	Duplicate recommendation. See Electrical Section under Loss Prevention for action taken (#20).	N/A
30	Square "D" switch gear does not meet design	Heins/Pankow	1995-96	11/27/96	Could not justify the cost of this replacement at the time. Plant will take responsibility for timing.	N/A
31	SEOLD" needs updated and to be posted	Boudreaux / Fair	7/1/94	4/22/94	Done as stated.	N/A
32	Train block electrical personnel on cable tray requirements	Boudreaux / Fair	7/1/94	9/28/94	Done as stated.	More time needed than allotted to complete task.
33	Add grounding conductors to cable trays	Heins / Fair	9/1/94	3/16/95	Most of the conductors installed. Impact on electrical reliability/safety was minimal.	Submitted as a routine maintenance work request. Due to maintenance backlog, action item not completed by ECD.
34	Have Meter & Relay verify ground grid on a recommended schedule	Boudreaux / Fair	9/1/94	8/1/94	Done as stated. Schedule in place and managed by the Electrical function.	N/A
	SAFETY AUDIT					
35	Develop plan to improve completion on USCR's	Sumly	3/31/94	3/29/94	Improvement plan in place.	N/A
36	Inspect cross ties on utility lines to process lines	Spears / Lemelle	3/31/94	2/22/94	Done as stated.	N/A
37	Conduct audits of safe work permits, confined space entry and LO/TO	Sumly	7/31/94	10/31/94	Implemented BBS audit program.	Waiting on division audit forms to be developed.
38	Develop LO/TO procedures for major pieces of equipment	Spears / Morgan	12/31/94	6/1/95	Done for major unit operations/equipment.	N/A
39	Upgrade documentation of drills and follow up action steps	Boudreaux	4/31/94	4/4/94	Drill documentation sheets developed	N/A

LAD CAUSTIC 1
1994 CONSOLIDATED AUDIT ACTION STEPS

	RECOMMENDATION	RESPONSIBILITY	ECD	ACD	Action Taken	Reason for Overdue?
40	Upgrade documentation of pre-startup reviews	Sumly	7/1/94	7/22/94	Using S&LP form and following MOC process.	More time needed than allotted to complete task.
41	Upgrade C-9 inspection deficiencies documentation	Sumly	9/30/94	7/31/94	Done as stated.	N/A
42	Modify safety meeting documentation sheet	Boudreaux	3/31/94	3/15/94	Done as stated.	N/A
43	Assure training documentation is properly completed.	Boudreaux	4/30/94	12/31/94	Done as stated.	Waited until year-end to confirm all training needing documentation was complete.
FIELD INSPECTION #1						
44	Place covers on panels behind the board.	Jefferson	3/31/94	3/31/94	Done as stated.	N/A
45	Housekeeping problem in conference room	Boudreaux	4/15/94	3/31/94	Done as stated.	N/A
46	Repair emergency light by O.P. office (has burned out bulb)	Boudreaux	6/1/94	5/30/94	Done as stated.	N/A
47	Put tool rest at or above centerline on grinder	Boudreaux	5/1/94	4/16/94	Done as stated.	N/A
48	Ensure protective equip. is available for grinder	Boudreaux	5/1/94	4/31/94	Done as stated.	N/A
49	Communicate not to sharpen soft materials on grinder wheel	Boudreaux	5/1/94	4/8/94	Done as stated.	N/A
50	Post instruction/warning signs on threading machine	Boudreaux	5/1/94	6/14/94	Signs installed.	Signs delivery took longer than anticipated.
51	Ensure protective equip. is available for drill press	Boudreaux	5/1/94	3/31/94	Done as stated.	N/A
52	Post instruction/warning signs on horiz. band saw	Boudreaux	5/1/94	6/14/94	Signs installed.	Signs delivery took longer than anticipated.
53	Communicate need for store harnesses and lanyards properly	Boudreaux	5/1/94	4/8/94	Communication made.	N/A
54	Evaluate flammable and oxygen storage area for 20' separation	Boudreaux	5/1/94	4/1/94	Evaluation complete and acceptable.	N/A
55	Replace bulb on exit sign north door of maintenance shop	Boudreaux	5/1/94	5/1/94	Bulb replaced.	N/A
56	Review improper/proper use of manlift baskets	Boudreaux	5/1/94	5/1/94	Done as stated.	N/A
FIELD INSPECTION #2						
57	Install "Contact Loader Before Entering" signs on T/C rack	Yelverton	6/1/94	6/13/94	Signs installed.	Signs delivery took longer than anticipated.
58	Paint Tank Car rack	Butler	12/31/94	12/10/96	Painting in 1996 deferred due to other significant, unexpected maintenance costs. Will paint if maintenance \$ available in 1997.	Painting in 1996 deferred due to other significant, unexpected maintenance costs. Will paint if maintenance \$ available in 1997.
59	Replace broken glass on analyzer house	Boudreaux	4/30/94	7/20/94	Done as stated.	Submitted as a routine maintenance work request. Due to maintenance backlog, action item not completed by ECD.
60	Audit all permanent ladders for gates and chains	Sumly	3/31/94	3/31/94	Done as stated.	N/A
61	Install gates and chains on permanent ladders as needed	Sumly	7/1/94	7/1/94	Done as stated.	N/A
62	Repair hole in steps near T-28	Butler	9/1/94	5/20/94	Done as stated.	N/A
63	Remove ladder #15 from service	Boudreaux	2/28/94	2/10/94	Done as stated.	N/A
64	Communicate to the need to wear hearing prot. with impact wrenches	Boudreaux	4/30/94	6/30/94	Done as stated.	More time needed than allotted to complete task.
65	Ground the drums in oil storage area	Boudreaux	5/1/94	5/25/94	Done as stated.	Submitted as a routine maintenance work request. Due to maintenance backlog, action item not completed by ECD.

LAD CAUSTIC 1
1994 CONSOLIDATED AUDIT ACTION STEPS

	RECOMMENDATION	RESPONSIBILITY	ECD	ACD	Action Taken	Reason for Overdue?
66	Verify grounding of flammable storage cabinet by lab	Boudreaux	5/1/94	5/30/94	Done as stated.	Submitted as a routine maintenance work request. Due to maintenance backlog, action item not completed by ECD.
	FIELD INSPECTION #2					
67	Label load limits on beam and hoists in plant	Harrison	6/1/94	5/31/96	Done as stated.	N/A
68	Improve house keeping in tank car loading area	Spears/Lemelle	on-going	On going		

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**DOW U.S. AREA
CONSOLIDATED AUDIT PROGRAM
CHLOR-ALKALI II PLANT**

Date of Report: January 26, 1995

Superintendent: Gretchen LeBlanc, Bldg. 3601

cc: Monty Heins, Bldg. 3601, LAD Buck Bailey, Bldg. 3301W, LAD
Roddey Peebles, Bldg. 1601, LAD Terry Leigh, Bldg. 1601, LAD
Chris Messelt, Bldg. 3502W, LAD Bill Cook, A-1230, Freeport, TX
John Gallamore, B-101, Freeport, TX

Enclosed are the recommendations from the various audits for your response. According to the Dow U.S. Area Consolidated Audit Program Guidelines and the OSHA Process Safety Management (PSM) standard 1910.119, you must develop an implementation plan as a response to the recommendations. The plan must include the name(s) of the employee(s) assigned to each action item along with an expected completion date for each item. Your plan must be reviewed and approved by the area Major Manager by March 15, 1995.

Please note that efforts have been made by the Functional Audit Teams to help prioritize each recommendation. They will be identified as: M = Must Do, (based on compliance issues, government regulations, Dow policies or S&LP) and HR = Highly Recommended, (necessary to mitigate an anticipated or potential hazard).

It is the responsibility of the plant/department supervision to communicate the results of the consolidated audit to all employees. Communication must include the results of the Process Hazard Analysis. PHA's include the Reactive Chemicals, Chemical Exposure Index (CEI), Process Safety and Loss Prevention/Fire/Burner Management audit and the Employee Survey Results. This must be completed within 90 days after the audit and documented.

Please send your approved implementation plans to Connie Kalencki, Bldg. 3502W by March 29, 1995. We will forward a copy to members of the Core Audit Team and the appropriate section to the Functional Team Leaders.

Enclosed Audit Recommendations:

1. Occupational Health Audit
2. Laboratory Audit
3. Electrical Reliability Audit
4. Reactive Chemical Audit
5. Security Audit
6. Hazardous Materials Transportation Audit
7. Loss Prevention/Fire Audit

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M = Must-Do

HR = Highly Recommended

8. Safety Audit

Howard Wilkinson, Administrator
LAD Consolidated Audit Program

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M = Must-Do

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HR = Highly Recommended

1994 CA II Consolidated Annual Summary

Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
RC-01	Develop chemical compatability chart	Heins, Monty	8/31/96	8/14/96	complete
RC-02	Review E-205/D-227 reactive chemical issues	Haun, Elaine	3/31/96	3/6/96	complete
RC-03	Chlorine Expansion Pot Concerns	Harrison, Jeff	4/1/95	3/27/95	complete
RC-04	C-205 Booster Compressor Issues	Harrison, Jeff	12/31/95	12/31/94	complete
RC-05	Review Titanium Storage Policy	Gravouilla, Rocky	04/15/96	9/30/95	complete
RC-06	CFC Reactive Chemical Review Documentation	LeBlanc, Gretchen	5/31/95	10/31/94	complete
RC-07	Review positive ID test for H2SO4	Harrison, Jeff	12/15/94	12/9/94	complete
RC-08	Review electrical heating tracing system on Cl2 lines	Fair, Leonard	6/15/95	10/8/95	complete
RC-09	Nitrogen Compound Analysis For Brine	Caldwell, Steve	05/31/95	11/18/94	complete
RC-10	Update Reactive Chemicals Documentation for Bicarb reaction	Harrison, Jeff	12/20/94	1/5/95	complete
RC-11	Investigate/address MDEA contamination potential in raw brine	Caldwell, Steve	05/31/95	3/1/96	complete
RC-12	Define Reactive Chemicals training levels	Landry, Donnie	8/1/96	12/31/95	complete
RC-13	Taffy Pot NCl3 analysis	Haun, Elaine	05/31/95	7/29/96	complete
RC-14	Liquid Cl2 pump EBV protection	Mellieon, Harold	12/31/95	12/20/95	complete
RC-15	Add SO2 liberation reactions to Reactive Chem Packet	Harrison, Jeff	12/15/95	1/9/95	complete

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1994 CA II Consolidated Audit Summary

Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
RC-16	Policy for Extinguishing a C/E trap hydrogen fire	Pittman, Ed	7/15/96	1/23/96	complete
RC-17	Review oil/insulation fire potential in GT area	Kolder, Roy	5/15/96	3/31/96	complete
RC-18	Hydrogen Collection Area Issues	Haun, Elaine	12/31/96	10/30/96	complete
RC-19	Reactive Chemicals test data for absorbents	Douglas, Charles	1/31/95	1/31/95	complete
RC-20	Update plants approved leak repair sealants list	Heins, Monty	05/31/95	8/31/95	complete
RC-21	Review procedures for lubricants and cleaning agents	Campbell, Floyd	05/31/95	5/30/95	complete
RC-22	Review lubricants and cleaning agents for Power area	Kolder, Roy	3/31/96	3/29/96	complete
RC-23	Review T-201 startup procedures	Mellieon, Harold	2/28/95	2/15/95	complete
RC-24	Address user plant backflow potential in caustic lines	Harrison, Jeff	12/31/94	6/1/94	complete
RC-25	Review maint procedures for caustic service cleaning agents	Campbell, Floyd	6/1/96	4/15/95	complete
RC-26	Centralized location for Reactive Chem Hazard Eval data	Heins, Monty	3/31/95	2/15/95	complete
MISC-01	Communicate results of consolidated audit	Heins, Monty	12/31/95	10/31/95	complete
OH-01	Lab does not have ownership	Lively, Bill	05/31/95	5/1/95	complete
OH-02	Work procedures need evaluation in pump seal room	Campbell, Floyd	3/31/95	3/28/95	complete
OH-03	Corroded safety can in oil storage area	Douglas, Charles	12/31/94	12/20/94	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
OH-04	Need to examine structural integrity of oil storage drum rack	Heins, Monty	12/31/94	12/15/94	complete
OH-05	Cell rodding cabinet needs new door sign	Armstrong, Steve	01/31/95	1/15/95	complete
OH-06	Labeling deficiencies need to be addressed	Douglas, Charles	12/31/94	12/20/94	complete
OH-07	Review hazard chemical list	Douglas, Charles	06/30/95	4/30/95	complete
OH-08	Communicate results of exposure monitoring	Douglas, Charles	06/30/95	8/31/95	complete
OH-09	Flammable containers not in flammable cabinet	Spears, Tony	05/31/95	3/7/95	complete
OH-10	MSDS sheets need updating	Douglas, Charles	06/30/95	3/15/96	complete
OH-11	Grinder needs hearing protection sign	Campbell, Floyd	3/31/95	3/28/95	complete
OH-12	Breathing air mask in control room needs secondary plastic bag	Douglas, Charles	06/30/95	6/30/95	complete
OH-13	Breathing air masks on shop floor	Douglas, Charles	12/31/94	12/31/94	complete
OH-14	Respirator training documentation records need to be dated	Douglas, Charles	12/31/94	12/20/94	complete
OH-15	Acid suits found in plant	Lively, Bill	06/15/95	6/15/95	complete
OH-16	Need to move heavy valves from top shelves	Campbell, Floyd	05/31/95	5/1/95	complete
OH-17	Need to replace static pressure operating parameter tape	Douglas, Charles	06/30/95	4/28/95	complete
OH-18	Sandblasting cabinet needs repairs	Campbell, Floyd	09/30/95	4/19/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
OH-19	Need to remove welding warning signs for cadmium	Campbell, Floyd	05/30/95	5/18/95	complete
OH-20	Update the asbestos inventory	Douglas, Charles	09/30/95	12/31/95	complete
OH-21	Bags of ACM waste not properly sealed	Douglas, Charles	12/31/94	12/20/94	complete
OH-22	Needs to wash down dried asbestos on pulp trailer	Armstrong, Steve	12/31/94	12/20/94	complete
OH-23	Need to bag material in asbestos waste drum	Armstrong, Steve	12/31/94	12/20/94	complete
OH-24	Need to store asbestos gaskets in designated area	Douglas, Charles	12/31/94	12/20/94	complete
OH-25	Need to update inventory to include sludge acidification process	Douglas, Charles	12/31/94	12/20/94	complete
OH-26	Need to replace deteriorated radiation label	Douglas, Charles	12/31/94	12/31/94	complete
LAB-01	Need mercury spill procedure	Caldwell, Steve	07/31/95	9/18/95	complete
LAB-02	Need to register chlorine sample cylinder	Breaux, Kevin	07/31/95	7/23/95	complete
LAB-03	Need housekeeping inspections	Myer, Edie	07/31/95	7/31/95	complete
ELEC-01	Motors not properly identified	Fair, Leonard	06/30/95	8/15/95	complete
ELEC-02	Need to add smoke detectors	Heins, Monty	06/30/96	4/30/96	complete
ELEC-03	Equipment stored in required clearance zone	Fair, Leonard	06/30/95	6/10/95	complete
ELEC-04	Identify and remove abandoned conduit	Heins, Monty	09/30/95	1/15/95	complete

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1994 CA II Consolidated Audit Summary

Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
ELEC-05	SEOLD's posted are not current	Fair, Leonard	06/30/95	6/30/95	complete
ELEC-06	Conduits not grounded at cable tray	Fair, Leonard	12/31/95	1/15/95	complete
DFA-01	All lines and valves need to be identified	Spears, Tony	07/31/95	4/15/95	complete
DFA-02	Display caution signs	Mellieon, Harold	07/31/95	7/31/95	complete
DFA-03	Need to recommend safety procedure for sodium bisulfite	Mellieon, Harold	06/30/95	3/28/96	complete
DFA-04	Hydrogen transfer hoses be put into Pressure Vessel Program	Kolder, Roy	6/30/96	6/15/96	complete
DFA-05	Emergency block valves be installed on hydrogen system	Kolder, Roy	08/15/95	11/15/95	complete
DFA-06	Need to conduct hydrogen trailer inspection	Kolder, Roy	03/30/96	3/18/96	complete
DFA-07	Need training for personnel off-loading hazardous materials	Landry, Donnie	12/31/94	12/20/94	complete
DFA-08	When off-loading must be attended by qualified person	Douglas, Charles	06/30/95	3/15/96	complete
LP-01	Need update of office area air intake procedure	Landry, Donnie	12/31/94	12/31/94	complete
LP-02	Inspect and correct interior fire wall design	Kolder, Roy	12/31/96	7/26/96	complete
LP-03	Wooden hot box not acceptable	Beck, Mike	5/1/96	4/15/96	complete
LP-04	Need to review electrical area classifications plot plan drawings	Fair, Leonard	07/31/95	6/30/95	complete
LP-05	Need to review fire extinguisher distribution and type	Landry, Donnie	8/1/96	6/30/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
LP-06	Review the critical instruments list	Long, Keith	8/30/96	8/15/96	complete
LP-07	Determine loop tests	Heins, Monty	3/1/97	12/1/96	complete
LP-08	Review the hydrogen area for EBV's	Kolder, Roy	07/31/95	12/31/94	complete
LP-09	Vendor supplied vessels need to meet pressure vessel program	Kolder, Roy	07/31/96	3/31/96	complete
LP-10	Need to include recommendations of MOC audit	Landry, Donnie	12/31/94	12/31/94	complete
LP-11	Project reviews need to be documented	Heins, Monty	06/30/95	12/31/94	complete
LP-12	Inspect liquid chlorine line	Haun, Elaine	05/01/95	5/1/95	complete
LP-13	Conduct risk assessment study	Haun, Elaine	12/31/96	9/19/96	complete
SAF-01	Develop a department safety policy statement	LeBlanc, Gretchen	12/05/94	12/5/94	complete
SAF-02	Conduct annual performance audits	Landry, Donnie	12/31/94	12/31/94	complete
SAF-03	Identify deviations from standard	Landry, Donnie	6/01/96	12/31/95	complete
SAF-04	Supervisors read the answers to questions with no opinions	Heins, Monty	06/30/95	12/31/94	complete
SAF-05	Have all employees set personal safety goals	Heins, Monty	05/15/95	3/15/95	complete
SAF-06	Review emergency drills	Landry, Donnie	3/31/96	2/15/96	complete
SAF-07	All employees need to participate in annual emergency drills	Landry, Donnie	12/31/95	12/31/95	complete

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1994 CA II Consolidated Audit Summary

Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-08	PHA's to be reviewed with employees	Heins, Monty	11/1/95	10/31/95	complete
SAF-09	Inform employees of rights under OSHA Star Program	Landry, Donnie	04/30/96	4/30/96	complete
SAF-10	Drill results must be critiqued	Landry, Donnie	12/31/95	12/31/95	complete
SAF-11	Update department emergency plan	Landry, Donnie	12/31/94	12/31/94	complete
SAF-12	Keep up-to-date completion dates on incidents	Landry, Donnie	8/1/96	8/1/96	complete
SAF-13	Keep up-to-date completion dates on safety suggestions	Landry, Donnie	8/1/96	8/1/96	complete
SAF-14	Perform checks on C-9 checklist	Landry, Donnie	12/31/95	12/20/95	complete
SAF-15	Document deficiencies during C-9 inspections	Landry, Donnie	8/1/96	11/4/96	complete
SAF-16	Update indoctrination video	Douglas, Charles	8/31/96	8/19/96	complete
SAF-17	Enter required info on training documentation	Landry, Donnie	8/1/96	8/1/96	complete
SAF-18	Covers left off panels	Beck, Mike	12/31/94	12/31/94	complete
SAF-19	Housekeeping needs in training room and printer room	Landry, Donnie	06/30/96	4/30/96	complete
SAF-20	Improper use of pedestal grinder	Campbell, Floyd	05/31/95	5/1/95	complete
SAF-21	Pipe threading machine needs larger signs	Campbell, Floyd	06/30/95	3/28/95	complete
SAF-22	Drill press needs signs	Campbell, Floyd	06/30/95	3/28/95	complete

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1994 CA II Consolidated Audit Summary

Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-23	Need shield around welding and cutting area	Campbell, Floyd	05/31/95	3/28/95	complete
SAF-24	Eyewashes with no covers	Spears, Tony	03/31/95	3/31/95	complete
SAF-25	Old eyewashes not capable of using covers	Lively, Bill	03/31/95	3/31/95	complete
SAF-26	Safety showers dripping with algae underneath	Moniotte, Bobby	11/30/95	11/30/95	complete
SAF-27	Lots of safety showers leaking	Kolder, Roy	06/30/95	12/31/94	complete
SAF-28	Fire extinguisher stations not labeled.	Spears, Tony	06/30/95	3/30/95	complete
SAF-29	Utility stations not color coded	Kolder, Roy	06/30/95	12/30/94	complete
SAF-30	Nitrogen station by P-301 has no backboard	Kolder, Roy	06/30/95	12/30/94	complete
SAF-31	MP-306-B guard needs to be replaced	Lemelle, Rick	10/31/95	10/10/95	complete
SAF-32	Modified coupling guards on some pumps	Lemelle, Rick	08/31/96	8/19/96	complete
SAF-33	Heat tracing exposed next to D-320 & D-317	Moniotte, Bobby	11/30/95	11/30/95	complete
SAF-34	Lots of unplugged quick opening valves in area	Lively, Bill	05/31/95	5/30/95	complete
SAF-35	Fire extinguisher not properly hung	Spears, Tony	06/30/95	3/15/95	complete
SAF-36	Fire extinguisher station not numbered	Lively, Bill	06/30/95	11/1/95	complete
SAF-37	Need to discard wooden ladder	Spears, Tony	05/31/95	1/19/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-38	Feet missing on step ladder	Lively, Bill	05/31/95	5/1/95	complete
SAF-39	Handrail needs to be replaced	Lemelle, Rick	06/30/95	6/30/95	complete
SAF-40	No cover in 110V outlet	Lemelle, Rick	10/31/95	9/29/95	complete
SAF-41	Drainage sumps filled with dirt	Kolder, Roy	06/30/96	6/15/96	complete
SAF-42	Safety shower needs painting	Lemelle, Rick	10/31/95	10/10/95	complete
SAF-43	Grating and hand rails need painting	Lemelle, Rick	10/31/95	10/10/95	complete
SAF-44	Demo area needs housekeeping	Tedeschi, Steve	12/31/94	12/31/94	complete
SAF-45	MCC-106 needs housekeeping attention.	Lively, Bill	05/31/95	5/1/95	complete
SAF-46	CTW basin drain line corroded through	Kolder, Roy	07/31/95	3/31/95	complete
SAF-47	Low level piping with head injury hazard	Kolder, Roy	06/30/96	6/15/96	complete
SAF-48	Trolley at cooling tower in bad shape	Kolder, Roy	06/30/96	6/15/96	complete
SAF-49	No handrails to platform	Moniotte, Bobby	11/30/95	10/15/95	complete
SAF-50	P-350 D&C with no MCC label	Fair, Leonard	07/1/95	6/25/95	complete
SAF-51	Stepladder with feet missing	Spears, Tony	05/31/95	1/19/95	complete
SAF-52	Uneven water flow to eyewash nozzles	Lively, Bill	03/31/95	3/31/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-53	No label for circuit for P-357-B	Fair, Leonard	05/31/95	5/31/95	complete
SAF-54	No ladder gate going up to platform	Landry, Donnie	8/1/96	7/1/96	complete
SAF-55	Cylinders tied with rope	Mellieon, Harold	05/31/95	5/31/95	complete
SAF-56	Unlabeled containers found throughout plant	Lively, Bill	12/31/95	11/1/95	complete
SAF-57	Safety shower eyewash with one cap missing	Spears, Tony	03/31/95	3/31/95	complete
SAF-58	Maul with taped handle	Campbell, Floyd	05/31/95	2/1/95	complete
SAF-59	Homemade tools found	Campbell, Floyd	05/31/95	2/10/95	complete
SAF-60	Fiberglass buildings full of fittings and wire	Fair, Leonard	05/31/95	3/28/95	complete
SAF-61	Fire extinguisher with expired sticker	Lively, Bill	05/31/95	3/15/95	complete
SAF-62	Fire extinguisher has expired sticker and broken bracket	Gravouilla, Rocky	05/31/95	3/31/95	complete
SAF-63	Millwright area discrepancies	Campbell, Floyd	06/30/95	5/1/95	complete
SAF-64	Welding area tool cabinet discrepancies	Campbell, Floyd	05/31/95	3/31/95	complete
SAF-65	Acetylene cart without T-handle	Campbell, Floyd	05/31/95	3/28/96	complete
SAF-66	D-803 area needs housekeeping	Spears, Tony	05/31/95	1/19/95	complete
SAF-67	Close handle broken off flammable storage cabinet	Lively, Bill	06/30/95	6/5/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-68	DAK pack full of water	Spears, Tony	05/31/95	2/22/95	complete
SAF-69	Flammable storage cabinet needs housekeeping	Lively, Bill	06/30/95	5/15/95	complete
SAF-70	Entry requirements not posted on shack	Landry, Donnie	06/30/95	6/1/95	complete
SAF-71	Utility station not labeled	Kolder, Roy	06/30/95	12/30/94	complete
SAF-72	Platform by taffy pot needs housekeeping	Spears, Tony	05/31/95	1/20/95	complete
SAF-73	Air station west of taffy pot not labeled	Kolder, Roy	03/29/96	3/28/96	complete
SAF-74	Area around taffy pots needs housekeeping	Spears, Tony	05/31/95	1/20/95	complete
SAF-75	Air utility needs labeling	Kolder, Roy	03/29/96	3/28/96	complete
SAF-76	T-205 deck needs housekeeping	Spears, Tony	05/31/95	1/20/95	complete
SAF-77	Escape pack has yellow reading	Lively, Bill	05/31/95	5/15/95	complete
SAF-78	New compressor foundation area needs housekeeping	Spears, Tony	05/31/95	1/20/95	complete
SAF-79	Utility station needs labeling	Kolder, Roy	06/30/95	12/31/94	complete
SAF-80	Housekeeping needs inside D-228 dike area	Spears, Tony	05/31/95	1/20/95	complete
SAF-81	Housekeeping needs around TC-201	Lively, Bill	05/31/95	5/15/95	complete
SAF-82	Red light on oxygen monitor is lit.	Neyland, Wayne	05/31/95	4/30/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-83	Hazardous waste under D-208	Lively, Bill	05/31/95	5/15/95	complete
SAF-84	Caps not on eyewashes	Lively, Bill	03/31/95	3/31/95	complete
SAF-85	Compressed gas cylinder secured with cloth straps	Neyland, Wayne	05/31/95	5/25/96	complete
SAF-86	Liquefaction area has tripping hazards	Lively, Bill	05/31/95	5/15/95	complete
SAF-87	Nitrogen station not labeled	Kolder, Roy	06/30/95	12/31/94	complete
SAF-88	Fire extinguishers sitting on ground	Lively, Bill	05/31/95	5/15/95	complete
SAF-89	Area full of old eyewashes without covers	Lively, Bill	03/31/95	3/31/95	complete
SAF-90	Unlabeled containers in oil storage area	Spears, Tony	05/31/95	1/25/95	complete
SAF-91	Oil storage area needs housekeeping	Lively, Bill	05/31/95	5/15/95	complete
SAF-92	Check chain security on block valves	Spears, Tony	05/31/95	2/3/95	complete
SAF-93	Escape pack needs replacing	Lively, Bill	05/31/95	5/15/95	complete
SAF-94	Oxygen sensor not working inside IH #12	Neyland, Wayne	05/31/95	4/30/95	complete
SAF-95	No meter light indication IH #10 & 11	Neyland, Wayne	05/31/95	4/30/95	complete
SAF-96	Nitrogen station on E-526 deck not labeled	Kolder, Roy	03/29/96	3/28/96	complete
SAF-97	E-526, D-511 area needs housekeeping	Lively, Bill	05/31/95	5/15/95	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-98	Ground wire off skid	Fair, Leonard	7/31/95	6/30/95	complete
SAF-99	Area around CO2 skid needs housekeeping	Spears, Tony	05/31/95	3/15/95	complete
SAF-100	Quick opening valves not plugged	Lively, Bill	05/31/95	5/15/95	complete
SAF-101	Quick opening valves not plugged	Spears, Tony	05/31/95	1/26/95	complete
SAF-102	Label skirt for vessel entry required	Landry, Donnie	4/30/96	4/30/96	complete
SAF-103	Need ladder gate on platform	Mellieon, Harold	06/30/95	5/1/95	complete
SAF-104	Fire extinguisher sitting on ground	Spears, Tony	05/31/95	2/8/95	complete
SAF-105	Utility stations not labeled	Kolder, Roy	06/30/95	12/30/94	complete
SAF-106	Hoses strung out on deck walkway	Lively, Bill	05/31/95	5/15/95	complete
SAF-107	Algae causing slipping hazard	Kolder, Roy	06/30/95	3/9/95	complete
SAF-108	Hoses on ground	Spears, Tony	05/31/95	2/4/95	complete
SAF-109	Algae at stairway entrance	Lively, Bill	05/31/95	5/15/95	complete
SAF-110	Hoses and rope on deck	Lively, Bill	05/31/95	5/15/95	complete
SAF-111	Gas cylinder tied with rope	Neyland, Wayne	05/31/95	4/30/95	complete
SAF-112	Escape packs condition not good	Landry, Donnie	8/1/96	8/1/96	complete

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Project No.	Action Item Description	Person Responsible	Expected Comp. Date	Actual Comp. Date	Status
SAF-113	Platform gates are not closing	Landry, Donnie	07/31/95	6/15/95	complete
LP-09	Vendor supplied vessels need to meet pressure vessel program	Mellieon, Harold	07/31/95	6/30/96	complete
SAF-15	Update indoctrination video	Landry, Donnie	8/31/96	8/19/96	complete

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