IMPROVEMENT OPPORTUNITIES
1995 PSM AUDIT - DEER PARK PVC PLANT

ELEMENT	IO#	DESCRIPTION	RESPONSIBILITY	TARGET DATE	COMPLETION DATE
Application 1910.119(a)	A9501	Develop an index system that will clearly identify the PSM file contents, location of data and the person(s) responsible for each portion of the PSM effort. **DOCUMENTATION:** Posted letter dated April 29, 1996, outlines each section of PSM Standard, Responsibility and Location	Cann		04/29/96
Process Safety Information 1910.119(d)	PSI9502	Maintain a data base of information pertaining to the chemicals of the process, technology of the process and equipment in the process. To facilitate easy retrieval and utilization of this information, it is recommended that an index system be maintained including methods for updating and maintaining the data current. **DOCUMENTATION:** Same letter as A9501, references MSD information, Mechanical Integrity information for equipment, and PMA's Cover Process P & ID's.	Cann		04/29/96
Process Hazard Analysis 1910.119(e)	PHA9503	Provide proper disposition for all items resulting from Hazops regardless of whether or not they have value and are actually implemented. Closure of findings and communication to appropriate people are critical parts of the documentation necessary to complete a process hazard evaluation. **DOCUMENTATION:** Several meetings were held with groups from different areas of the plant to review sets of open PHA recommendations. Many were closed out at that time and some needed more help. In either event each recommendation was given proper disposition as to whether it needed further review or not. The rest that were not closed were forwarded for approval to:	DeSantis		10/01/96

NGC 13279

ELEMENT	IO#	DESCRIPTION	RESPONSIBILITY	TARGET DATE	COMPLETION DATE
		The Project Group The PMSEC The bi-weekly maintenance meeting. Out of those meetings action items were assigned to individuals with target dates for completion. All documentation is provided in the MANAGE-PC database of PRIMATECH software on our computer system.			
Operating Procedures 1910.119(f)	OP9504	Review each operating procedure, as they are being reworked by ICT, to ensure inclusion of each operating phase listed under paragraph 1910.119(f)(l)(i). **DOCUMENTATION:** This was completed in February. Two subject matter experts, one operator and one head operator were assigned to work with ICT to make this happen	Payne		02/97
	OP9505	Ensure operating procedures include operating limits that outline consequences of process deviation and steps required to correct or avoid deviations. **DOCUMENTATION:** This was completed in February, using the same two subject matter experts.	Payne		02/97
	OP9506	Establish a routine to review and certify annually that operating procedures are current, accurate and reflect existing process technology. **DOCUMENTATION:** This routine has been in place for sometime. We plan to renew and certify all procedures on a semi-annual basis. Next review is scheduled for mid-June, 1997.	Payne		06/01/96

ELEMENT	IO#	DESCRIPTION	RESPONSIBILITY	TARGET DATE	COMPLETION DATE
Training 1910.119(g)	T9507	Verify completeness of file documentation where Deer Park Plant has "grandfathered" operators involved in operating a process prior to May 26, 1992. Apply this same activity to maintenance craft person. Ability to justify why a person was "grandfathered" will be best management practice. **DOCUMENTATION:** The Maintenance Department has all the old files pertaining to all their training We also now put in the files any new training they do. All Manufacturing personnel have a "Grandfather" Certificate of Training in their training folder signed by Supervisor. This document was added to the individuals training folder in 1992.	Henderson (Maintenance) Payne (Operations)		01/01/96 01/01/96
Training 1910.119(g)	T9508	Training records must include information indicating that each employee involved in operating a PSM process has been trained in each phase listed under paragraph 1910.119(g)(l)(l). Operating limits relating to consequences of deviation and steps to avoid deviations need to be addressed **DOCUMENTATION:** Training records indicate the operators were training in all tasks for their areas. This includes operating limits.	Payne		03/06/97
	T9509	Employers must consult with its employees, who are involved in operating the PSM process, to determine the frequency for refresher training. Document this effort. **DOCUMENTATION:** E-Mail sent to all Shifts December 17, 1997, asking each employee this question. Memos are in my E-Mail File.	Payne		03/06/97

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	T9510	Recommend converting manual training data management system to electronic data management system such as TRIM. This system is used at several GEON facilities. **DOCUMENTATION:** Trim is being used. People positions, and courses are already in the Database. As resources are available, the next step will follow.	O'Keefe/Payne		10/01/96
Contractors 1910.119(h)	C9511	Implement a requirement whereby contractors, as an employer, understand and carry out their responsibilities under paragraph 1910.119(h)(2)(v). **DOCUMENTATION:** Safety Questionnaires are filled out on Contractors prior to working at GEON; This includes review of OSHA 200/Log with final approval by GEON-Safety. Annually, Purchasing sends to GEON contact a "Vendor Appraisal Form" for Contractor performance during the previous year.	Heinschel		04/30/96
	C9512	Deer Park person(s) should audit contractors (routinely used by the plant) to verify that they are fulfilling their responsibility according to paragraph 1910.119(h)(2)(v). **DOCUMENTATION:** On several occasions through out the year the following vendors have been inspected or visited: Law Valve - Relief Valve Repairs Bird Machine - Centrifuge McNeely Machine - Machine Work Amber Electric - Electrical Contractor Force Construction - Capital Construction Projects ACS Labs - Baxter Testing NALCO - Water Treating OXY - Utilities	Heinschel		04/30/96

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Mechanical Integrity 1910.119(j)	MI9513	Recommend plant develop site specific Mechanical Integrity policy to reflect actual actions being executed in complying with this element. Review the document *Elements of a Written Technical PSM Analysis* (Appendix No. 1) so that all appropriate equipment/systems are included and non PSM equipment/systems are excluded with reasons for each decision. **DOCUMENTATION:** Law Engineering and Environmental Services completed the Deer Park Integrity program on April 18, 1997. Procedures include the following: General Guidelines, Pressure Vessels and Reactors, Storage Tanks, Fiberglass Reinforced Plastic Tanks/Vessels, Piping Systems, Eddy Current of Seamless and welded Non-Ferromagnetic Heat Exchanger, Eddy Current of Seamless Copper and Copper Alloy Tubing, Flux Leakage of Ferromagnetic Heat Exchanger Tubing, Sample Inspection Procedures and Scoustic Emission Testing.	Lindstrom	09/01/97	05/08/97
	MI9514	Where recommendations have been made to correct deficiencies noted during inspection of PSM elements, timely action to resolve, complete documentation and communication to appropriate people must be achieved, i.e. natural gas pipeline. **DOCUMENTATION:** Pipeline repairs have been completed. Work orders and Purchase Orders are used to verify completure plus new inspections.	Lindstrom		04/30/96
	MI9515	Establish random audit system whereby relief valve repairs and settings are verified at repair shop prior to receiving in plant. **DOCUMENTATION:** P/M in Champs is established to do this item quarterly.	Lindstrom		04/30/96

NGC 13283

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Management of Change 1910.119(l)	MOC9516	Develop check list type form to ensure, except for "replacement in kind", management of change request address technical basis for change, impact on safety and health, modifications to operating procedures, necessary time period, authorization required, informing and training of affected employees, and updating process safety information and operating procedures or practice. **DOCUMENTATION:** New MOC Procedure has a checklist.	McKinley/ Johnson		11/15/96
	MOC9517	Develop a list of positions who have authority to approve a M.O.C. involving other than "replacement of kind" in a PSM area. **DOCUMENTATION:** New MOC Procedure has Authorization List.	McKinley		11/15/96
Incident Investigation 1910.119(m)	II9518	Take action to bring formal closure to action item recommendations noted during incident investigations. **DOCUMENTATION:** Developed Corrective Action Report: Section I - Safety & Environmental Narratives Section II - Safety Audit Items Section III - Safety Walk Thru Items These are updated and distributed monthly.	DesJardins		04/15/96
Compliance Audits 1910.119(o)	CA9519	Retain the two most recent audits. Utilizing report findings, develop response, take corrective action and document closure.	DesJardins		04/15/96

ELEMENT	IO#	DESCRIPTION	RESPONSIBILITY	TARGET DATE	COMPLETION DATE
		DOCUMENTATION: *Files are located in the Safety Office.*			

Revised: 05/08/97

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NGC 13285