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The Dow Chemical Company
P O Box 150
Plaquemine Louisiana 70765-0150

DOW NORTH AMERICA CONSOLIDATED AUDIT PROGRAM

Methanes Plant

Date of Report: 6/19/95

Superintendent: Don Taylor, Bldg. 4601

cc: Roddey Peebles, Bldg. 1601, LAD
Maurice Oubre, Bldg. 6650, LAD
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Vick McMurry, Bldg. 4601, LAD
Terry Leigh, Bldg. 1601, LAD
Greg Schultz, Bldg. 1601, LAD

Enclosed are the recommendations from the Occupational Health Audit for your response. According to the Dow North American 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 July 21, 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).

Please send your approved implementation plans to Connie Kalencki, Bldg. 3502W by July 28, 1995. We will forward a copy to members of the Core Audit Team and the Functional Team Leader.

Howard Wilkinson

Howard Wilkinson, Administrator
LAD Consolidated Audit Program

All of these Greg Schultz 11/30/95

M 3. Some chemicals were stored behind the door in the lab. The leaking stem valve needs to be replaced on the box of Lang Caustic.

Action Taken/To Be Taken:

Responsibility	*Expected Completion Date*	*Actual Completion Date*

M 4. The boxes being stored need the eyewash need to be relocated.

Action Taken/To Be Taken:

Responsibility	*Expected Completion Date*	*Actual Completion Date*

M 5. Need to create a letter documenting compliance with benzene and vinyl chloride regulations during emergency burns from Vinyl II.

Action Taken/To Be Taken:

Responsibility	*Expected Completion Date*	*Actual Completion Date*
[redacted]		

HAZCOM PROGRAM

The labeling of plant equipment was good and process vessels, columns and pumps were all numbered. The HAZCOM/MSDS notebooks are readily available in the control room. Personnel received annual hazcom training in March, 1995.

Recommendations:

M 1. The following labeling related deficiencies need to be addressed:

a. 5 gallon containers of antifoam in old control room; one unlabeled and one with an illegible label

b. Chemical container with torn label and one outside shop area not labeled.

Recommendations:

M 1. The drill press located in the shop area needs to have a PPE sign to include "hearing protection required".

Action Taken/To Be Taken:

Responsibility | *Expected Completion Date* | *Actual Completion Date*

M 2. Review the written hearing protection program for currency.

Action Taken/To Be Taken:

Responsibility | *Expected Completion Date* | *Actual Completion Date*

M 3. Addition area warning signs need to be posted (near K-1100).

Action Taken/To Be Taken:

Responsibility | *Expected Completion Date* | *Actual Completion Date*

RESPIRATORY PROTECTION

The plants' written Respiratory Protection Program was reviewed in 1994. The air line respirators are equipped with the correct match of regulator and exhalation valve and annual respiratory protection training was presented in March, 1995.

Recommendations:

M 1. Several mouth-bit respirators were found lying around without owner name. These should be discarded or appropriately labeled. (instrument shop; ladies restroom, lab)

Action Taken/To Be Taken:

Responsibility | *Expected Completion Date* | *Actual Completion Date*

Recommendations:

M 1. The written program needs reviewing for currency.

Action Taken/To Be Taken:

Responsibility *Expected Completion Date* *Actual Completion Date*

HR 2. There is a need for a place to store PPE in an accessible manner. PPE was found discarded in several places throughout the plant.

Action Taken/To Be Taken:

Responsibility *Expected Completion Date* *Actual Completion Date*

HR 3. There is a sign in the MAPP motor control center denoting the availability of protective clothing however the PPE is located in another MCC across the plant. We recommend the sign be modified to state where the PPE is located. This MCC does have 440 switches denoting PPE required.

Action Taken/To Be Taken:

Responsibility *Expected Completion Date* *Actual Completion Date*

ERGONOMICS

Recommendations:

None at this time

THERMAL STRESS

Recommendations:

No recommendations at this time.

ASBESTOS

There is an asbestos handling decision flow diagram posted on the bulletin board for general information; however it is not the latest version and should be replaced with current version. The inventory was last performed in 1993 and is still current provided any changes are documented.

Recommendations:

M 1. Need to perform and document annual inspection of asbestos containing material for condition.

Action Taken/To Be Taken:

Responsibility *Expected Completion Date* *Actual Completion Date*

M 2. There is an old piece of transite in a bag that needs to be disposed of outside the maintenance shop as well as some gaskets.

Action Taken/To Be Taken:

Responsibility *Expected Completion Date* *Actual Completion Date*

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500000
OCCUPATIONAL HEALTH AUDIT - GENERAL INDUSTRIAL HYGIENE/MEDICAL

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/30/95 **Comp. Date:**
Refirgerator & oven in B-4606 & refirgerator in B-4610 maintenance break room need cleaning.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500000
OCCUPATIONAL HEALTH AUDIT - GENERAL INDUSTRIAL HYGIENE/MEDICAL

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Area around outfall site #1521 needs housekeeping (i.e. broken, discarded PVC floating device, tape, rope)

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500000
OCCUPATIONAL HEALTH AUDIT - GENERAL INDUSTRIAL HYGIENE/MEDICAL

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Some chemicals were stored behind the door in lab. The leaking stem valve needs to be replaced on the box of Lang Caustic.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500000
OCCUPATIONAL HEALTH AUDIT - GENERAL INDUSTRIAL HYGIENE/MEDICAL

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The boxes being stored near the eyewash need to be relocated.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500000
OCCUPATIONAL HEALTH AUDIT - GENERAL INDUSTRIAL HYGIENE/MEDICAL

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Need to create a letter documenting compliance with benzene & vinyl chloride regulations during emergency burns from Vinyl II.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500001
OCCUPLATIONAL HEAL TH AUDIT - HAZCOM PROGRAM

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Address following labeling related deficiencies: 1) 5 gallon containers of antifoam in old control room; one unlabeled and one with an illegible label; 2) chemical container with torn label and one outside shop area not labeled; 3)

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500001
OCCUPLATIONAL HEAL TH AUDIT - HAZCOM PROGRAM

F ,w-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The written hazcom program is dated April 1993 & needs review for currency.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500001
OCCUPLATIONAL HEAL TH AUDIT - HAZCOM PROGRAM

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The Chemical & Physical Agency Inventory was last updated in November, 1992 & needs updating to include maintenance chemicals.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500002
OCCUPATIONAL HEALTH AUDIT - HEARING CONSERVATION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The drill press located in the shop area needs to have a PPE sign to include "hearing protection required".

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500002
OCCUPATIONAL HEALTH AUDIT - HEARING CONSERVATION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Review the written hearing protection program for currency.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500002
OCCUPATIONAL HEALTH AUDIT - HEARING CONSERVATION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Additional area warning signs need to be posted (near K-1100).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500003
OCCUPATIONAL HEALTH AUDIT - RESPIRATORY PROTECTION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 6/19/95 **Comp. Date:**
Several mouth-bit respirators were found lying around without owner name. These should be discarded or appropriately labeled (instrument shop, ladies restroom, lab)

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500003
OCCUPATIONAL HEALTH AUDIT - RESPIRATORY PROTECTION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The written program needs to be reviewed for currency & should include visitors and non-Dow employees.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500003
OCCUPATIONAL HEALTH AUDIT - RESPIRATORY PROTECTION

F ow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Several full-face respirators need to be properly stored (i.e., not in secondary containers, hanging by straps).

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500003
OCCUPATIONAL HEALTH AUDIT - RESPIRATORY PROTECTION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The respirator cleaning station needs to be cleaned up (remove the broken mask facepiece & the bottle of Shell oil).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500003
OCCUPATIONAL HEALTH AUDIT - RESPIRATORY PROTECTION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Several regulators in the old control room have inspection dates of 9/91 & 10/92. These should be inspected by Vallen every 18 months. There is a regulator hanging on a fence in the shop area which needs to be stored properly.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500004
OCCUPATIONAL HEALTH AUDIT - PERSONAL PROTECTIVE EQUIPMENT

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The written program needs reviewing for currency.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500004
OCCUPATIONAL HEALTH AUDIT - PERSONAL PROTECTIVE EQUIPMENT

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
There is a need for a place to store PPE in an accessible manner. PPE was found discarded in several places throughout the plant.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500004
OCCUPATIONAL HEALTH AUDIT - PERSONAL PROTECTIVE EQUIPMENT

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** **Comp. Date:**
There is a sign in the MAPP motor control center denoting the availability of protective clothing; however, the PPE is located in another MCC across the plant. We recommend the sign be modified to state where the PPE is located. This

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500005
OCCUPATIONAL HEALTH AUDIT - VENTILATION

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Investigate the reason for the oxygen alarm in Analyzer house #12.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500005
OCCUPATIONAL HEALTH AUDIT - VENTILATION

F w-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
The air conditioner in analyzer house #AH-1 was not operating, although entry requirements stipulate the need for it to be operational. Either repair unit or change entry requirement sign on door.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500006
OCCUPATIONAL HEALTH AUDIT - WELDING
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Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Acquire new MSD sheets for welding rods used in the shop.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500007
OCCUPATIONAL HEALTH AUDIT - ASBESTOS

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
Need to perform & document annual inspection of asbestos containing material for condition.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500007
OCCUPATIONAL HEALTH AUDIT - ASBESTOS

Follow-Up Action **Responsibility:** Greg Schultz **Expected Date:** 11/1/95 **Comp. Date:**
There is an old piece of transite in a bag that needs to be disposed of outside the maintenance shop as well as some gaskets.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500008
CONSOLIDATED AUDIT - LAD PROCESS HAZARD ANALYSIS

Follow-Up Action **Responsibility:** Vic McMurray **Expected Date:** 8/11/95 **Comp. Date:**
Communicate results of the Consolidated Audit to plant personnel within 90 days after the audit report date. The communication must include a brief summary of the Reactive Chemical Review, Employee Survey results, Chemical

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500009
CONSOLIDATED AUDIT - LABORATORY AUDIT

Follow-Up Action **Responsibility:** Terry Vavasseur **Expected Date:** 7/7/95 **Comp. Date:**
Remove all reagents that are not needed in the process (calcium carbide).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500009
CONSOLIDATED AUDIT - LABORATORY AUDIT

Follow-Up Action **Responsibility:** Terry Vavasseur **Expected Date:** 7/7/95 **Comp. Date:**
Clean out all spray paint cans.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500009
CONSOLIDATED AUDIT - LABORATORY AUDIT

F w-Up Action **Responsibility:** Terry Vavasseur **Expected Date:** 8/15/95 **Comp. Date:**
Install door on refrigerator door "Not Explosive Proof".

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500010
CONSOLIDATED AUDIT - ELECTRICAL RELIABILITY AUDIT
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Follow-Up Action **Responsibility:** Charlie Emmonet **Expected Date:** 8/4/95 **Comp. Date:**
10 to 15% of motors have grounds loose or not grounded to frame. Ground motors per L7C-0101-00 par 5.4. Train block electrical personnel in proper grounding practices.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500010
CONSOLIDATED AUDIT - ELECTRICAL RELIABILITY AUDIT

Follow-Up Action **Responsibility:** Rodney Burris **Expected Date:** 7/14/95 **Comp. Date:**
90% of cables in field junction box have the overall shield ungrounded. Connect overall shields to ground. Train block I/E personnel in proper grounding practices.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500010
CONSOLIDATED AUDIT - ELECTRICAL RELIABILITY AUDIT

Follow-Up Action **Responsibility:** Rodney Burris **Expected Date:** 8/14/95 **Comp. Date:**
Safety electrical one line diagram is not current or correct. Correct SEOLD.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500010
CONSOLIDATED AUDIT - ELECTRICAL RELIABILITY AUDIT

Follow-Up Action **Responsibility:** Rodney Burris **Expected Date:** 8/14/95 **Comp. Date:**
Bus system not identified by SEOLD I.D. Label all switchgear bus with SEOLD I.D.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/30/95 **Comp. Date:**
Concerning the inadvertent use of titanium parts in dry chlorine: 1) add a statement to the block safety indoctrination package on the reactive chemical hazards of using titanium parts in dry chlorine service; b) consider adding a

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Kevin Kelley **Expected Date:** 7/30/95 **Comp. Date:**
Concerning the reactive chemical review slides for the Thermal Chlorinator: Add "Evacuation of personnel from reactor area during start-up" to the lines of defense for avoiding injuries due to a possible deflagration/detonation.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

F w-Up Action **Responsibility:** Kevin Kelley **Expected Date:** 7/28/95 **Comp. Date:**
Consider the following scenario & make sure appropriate safeguards are in place to avoid a runaway decomposition: D-1 tar pot is blocked in & 235# steam flow does not shut off. If the decomposition temperature is not known, ARC data

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Steve Ledoux **Expected Date:** 9/8/95 **Comp. Date:**
Review the materials of construction in the sulfuric acid demister & make sure that they are compatible over the range of temperature & % sulfuric acid that will be encountered in normal & upset conditions.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Don Taylor **Expected Date:** 6/30/95 **Comp. Date:**
There is no reactive chemicals contact person for CMP. This responsibility should be assigned to someone.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Kevin Kelley **Expected Date:** 9/1/95 **Comp. Date:**
Consider developing a reactive chemicals IPS module & include all the major worst case scenarios & lines of defense.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Kevin Kelley **Expected Date:** 10/20/95 **Comp. Date:**
Summaries of reactive chemicals reviews including the worst case scenarios & lines of defense should be reviewed with theoutside operators & boardmen.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Kevin Kelley **Expected Date:** 12/29/95 **Comp. Date:**
Review job procedures & if there is a reactive chemical hazard associated with the job being performed consider adding a paragraph listing the hazard.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 6/30/95 **Comp. Date:**
Train operators on the reactive hazard of inadvertently using a titanium part in dry chlorine service. Most did not know when interviewed.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

F w-Up Action **Responsibility:** Julie Clebert **Expected Date:** 6/30/95 **Comp. Date:**
Plant communications book could be an excellent means for communicating current reactive chemical issues. We only found 1 entry pertaining to reactive chemicals. Information on the incident involving M1 in a T/C with aluminum

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CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT
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Follow-Up Action **Responsibility:** Steve Ledoux **Expected Date:** 7/14/95 **Comp. Date:**
R-250 procedures for dumping spent catalyst: The specific hazard of spontaneous ignition of organic material on the spent alumina is not listed. The comment in the procedures is "because catalyst is so dry, we need to spray water mist

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** Jim Haney **Expected Date:** 9/29/95 **Comp. Date:**
PSA carbon change out procedures need to be reviewed & the flammability hazard of dry carbon in air needs to be included.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500011
CONSOLIDATED AUDIT - REACTIVE CHEMICALS UNIT

Follow-Up Action **Responsibility:** K. Kelley/M. Oubre **Expected Date:** 12/29/95 **Comp. Date:**
A listing & summary of reactive chemicals data was not available for CMP. This needs to be done & we recommend that the Tech Center assists.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 12/29/95 **Comp. Date:**
Review the low pressure flammables storage tanks to assure that the controls & monitoring is adequate to prevent oxygen contamination.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 12/29/95 **Comp. Date:**
When the sprinker system is next tested, verify that the surface drainage is adequate to avoid area flooding.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Charlie Emmonet **Expected Date:** 12/29/95 **Comp. Date:**
Review cable tray passage ways to be sure they are properly sealed to comply with good electrical installation guidelines.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

F w-Up Action **Responsibility:** Buck Bailey **Expected Date:** 12/29/95 **Comp. Date:**
Review the possibility of installing a combustible gas monitor in the fresh air intake to office & control room.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Buck Bailey **Expected Date:** 7/28/95 **Comp. Date:**
Review the layout of CL2 area monitors to reconsider the need for additional installations, specifically in the NW quadrant of the plant.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Jim Haney **Expected Date:** 7/7/95 **Comp. Date:**
Some of the CL2 instrumentation valving is showing signs of corrosion. Also, some indications of gasket deterioration has been observed.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Kevin Kelley **Expected Date:** 8/15/95 **Comp. Date:**
Wrap up the documentation of the CEI calculations package.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Buck Bailey **Expected Date:** 7/14/95 **Comp. Date:**
The Dow "Process Risk Management Guideline" requires a HAZOP study for any scenarios areas where the CEI exceeds 200. Since Dow has reviewed the company guideline with OSHA, it is also an OSHA 1910.119 requirement.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Charlie Emmonet **Expected Date:** 7/14/95 **Comp. Date:**
Any recommendations from the Electrical Maintenance Dept. 5-Point Audit should be included here.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Buck Bailey **Expected Date:** 7/28/95 **Comp. Date:**
Review & update the plant Fire Protection Plot Plan to comply with recent changes made in the area coverage. Contact Loss Prevention to initiate the activity.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

F w-Up Action **Responsibility:** Security **Expected Date:** 12/29/95 **Comp. Date:**
Revie the smoke detector needs for B-4610 with the Fire Protection Dept.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Buck Bailey **Expected Date:** 12/29/95 **Comp. Date:**
Review the CGD coverage in the new area of the plant.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Vic McMurray **Expected Date:** 7/28/95 **Comp. Date:**
Combustible gas detectors should be included on the critical instruments program.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Al Shanklin **Expected Date:** 8/14/95 **Comp. Date:**
Review instruments test procedures. Several are listed as "missing" or "wrong name".

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Al Shanklin **Expected Date:** 8/14/95 **Comp. Date:**
Some procedures do not indicate the exact process condition the instrument is intended to respond to. Trip or alarm set points should be noted exactly in the procedure to assure proper calibration checks.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Al Shanklin **Expected Date:** 8/30/95 **Comp. Date:**
Several of the procedures are redundant. Review these to be sure they provide adequate instruction for the instrument technician.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action **Responsibility:** Buck Bailey **Expected Date:** 12/29/95 **Comp. Date:**
Review vessels with >5,000 gal. capacity to see if they comply with the current Tech Center & LPP guidelines.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

F w-Up Action **Responsibility:** James Cook **Expected Date:** 10/1/95 **Comp. Date:**
Consider identification of EBV's per L.P.P. 1.5.5.

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Description Type Follow-Up Consolidated Audit Reference #: 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action Responsibility: Kevin Kelley Expected Date: 7/14/95 Comp. Date:
A division plan is in progress to identify & document PSV's that must comply with requirements outlined in the OSHA 1910.119 regulation. Coordinate this activity with the Process Engineering Dept. to develop a plan of action & schedule.

Description Type Follow-Up Consolidated Audit Reference #: 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action Responsibility: J. Haney/S. Ledoux Expected Date: 10/20/95 Comp. Date:
Review the critical equipment list for anything not spared that would extend a plant outage due to lack of a replacement. (Ex. Thermal Chlorinator start up rectifier, major compressor parts, etc.

Description Type Follow-Up Consolidated Audit Reference #: 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action Responsibility: Vic McMurray Expected Date: 7/28/95 Comp. Date:
Parts of the "Emergency Plan" questionnaire were incomplete. Review to be sure these are adquately included in the plant procedures.

Description Type Follow-Up Consolidated Audit Reference #: 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Fonow-Up Action Responsibility: Vic McMurray Expected Date: 8/14/95 Comp. Date:
Follow up with Loss Prevention to complete & review the insurance material that must be sent to the Corporate Loss Prevention office.

Description Type Follow-Up Consolidated Audit Reference #: 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action Responsibility: Vic McMurray Expected Date: 10/20/95 Comp. Date:
Review the "Process Hazard Analysis" (F&EI, CEI, Reactive Chemicals) with the plant staff & operations & provide training on tbe process.

Description Type Follow-Up Consolidated Audit Reference #: 500012
CONSOLIDATED AUDIT - LOSS PREVENTION/FIRE/BURNER MGMT./CEI REVIEW

Follow-Up Action Responsibility: Vic McMurray Expected Date: 10/20/95 Comp. Date:
Conduct a PHA training meeting with the plant technical & supervisor staff. Schedule with Loss Prevention to present the training & provide material for further presentation to the operations employees. This will include F&EI and CEL

Description Type Follow-Up Consolidated Audit Reference #: 500013
CONSOLIDATED AUDIT - HAZARDOUS MATERIALS TRANSPORTATION

F w-Up Action Responsibility: Julie Clebert Expected Date: 8/30/95 Comp. Date:
At the time of the plant walk-through, the training coordinator was out of town for several days; please send a copy of one of your loaders and E/R team members training records for the 1994 and YTD training.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500013
CONSOLIDATED AUDIT - HAZARDOUS MATERIALS TRANSPORTATION

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 8/30/95 **Comp. Date:**
Please contact me either by phone or E-mail whenever you have an incoming shipment (residue or load) of hazmats that has a securement problems - especially if it happens to be shipped from another Dow facility.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Vic McMurray **Expected Date:** 7/30/95 **Comp. Date:**
Based on the Safety Employee Survey results & review with the CMP staff, action plans should be developed & implemented to address the following areas: a) Mgmt support; b) Employee participation; c) Individual responsibility

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Vic McMurray **Expected Date:** 7/28/95 **Comp. Date:**
Define/communicate & document a specified time for response to safety suggestions & unsafe conditions.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Don Taylor **Expected Date:** 7/14/95 **Comp. Date:**
Develop a plan to track corrective actions to closure on accident/incident reports.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 12/29/95 **Comp. Date:**
Conduct annual performance audits of safe work permits, confined space entry & lockout/tagout. Also, deviations must be tracked to completion.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Don Taylor **Expected Date:** 7/28/95 **Comp. Date:**
Define who can authorize a confined space entry permit.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Gary Rizzo **Expected Date:** 7/14/95 **Comp. Date:**
Documentation of training superintendent & technical employees new to the process must be maintained on file.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY
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Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/14/95 **Comp. Date:**
Revise plant safety policy per new superintendent.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/14/95 **Comp. Date:**
Emergency drill documentation looks good. However, include name of each individual participating in drill instead of shift name.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Vic McMurray **Expected Date:** 7/28/95 **Comp. Date:**
The Communique Book is used for communicating changes in procedures, etc. However, all applicable employees are not signing & dating.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** G. Rizzo/B. Donatto **Expected Date:** 7/28/95 **Comp. Date:**
Several corrective actions are well beyond the expected completion dates. Emphasis should be placed on completing these actions in a reasonable amount of time. However, in cases where the expected completion date cannot be met, a

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** G. Rizzo/B. Donatto **Expected Date:** 7/28/95 **Comp. Date:**
Several corrective actions on UCR;s are beyond the expected completion date. Response time needs improvement. Emphasis should be placed on responding in a reasonable amount of time. However, in cases where the expected

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/14/95 **Comp. Date:**
Post C-9 checklist in control room.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Brian Donatto **Expected Date:** 8/4/95 **Comp. Date:**
Perform checks on C-9 checklist & sign off on master on or before the due dates. All scheduled dates, next due date, last date, etc. blocks need to be completed.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 12/28/95 **Comp. Date:**
Deficiencies identified during the C-9 inspections must be documented & corrective actions tracked to completion. Documentation must show what corrective action was, who completed corrective action & when corrective actions was

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** G. Rizzo/H. Grace **Expected Date:** 7/28/95 **Comp. Date:**
Deficiencies identified during hazard identification inspections must be documented & corrective actions tracked to completion. Documentation must show what corrective action was, who completed corrective action & when corrective

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/28/95 **Comp. Date:**
Update plant orientation. Include test as part of the orientation.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 10/20/95 **Comp. Date:**
Some formal training on Mod5 not being documented. Documentation must include the subject, instructor, date & signature of employees that attended.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/28/95 **Comp. Date:**
Maintain technical employee training documentation on file & make sure accessible in a reasonable amount of time.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Rizzo/Dugas/Cook/Cl. **Expected Date:** 7/28/95 **Comp. Date:**
Training in areas that is not applicable for a particular employee should be noted as "not applicable" on the documentation.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Gary Rizzo **Expected Date:** 7/28/95 **Comp. Date:**
Documentaiton should include signature of employee participating in the training.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY
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Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/4/95 **Comp. Date:** 6/9/95
Need to clear up all masters over 90 days by either retagging or permanent isolation.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/4/95 **Comp. Date:**
Train/retrain people on proper isolation & lockout/tagout procedures.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/4/95 **Comp. Date:** 6/9/95
Train employee on S&LP 313 check valve assembly.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/28/95 **Comp. Date:**
Follow-up to correct all deficiencies noted in the safe work permit audit.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 6/9/95 **Comp. Date:** 6/2/95
Remove ladder inside ER room & store properly.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 6/9/95 **Comp. Date:** 5/26/95
Remove out of date "critical safety procedures" book in the control room.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F ,w-Up Action **Responsibility:** Brian Donatto **Expected Date:** 6/9/95 **Comp. Date:** 5/26/95
Cover garbage can in designated eating area in B4606

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Barry Young **Expected Date:** 7/4/95 **Comp. Date:**
Perform general housekeeping in B4601T (project trailer).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** **Expected Date:** **Comp. Date:**

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Barry Young **Expected Date:** 7/4/95 **Comp. Date:**
Repair lighted exit sign for B-4601T (project trailer).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Fouow-Up Action **Responsibility:** **Expected Date:** **Comp. Date:**
Perform housekeeping in janitor's closet in B-4610 (maintenance bldg.).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Brian Donatto **Expected Date:** 7/5/95 **Comp. Date:**
Secure fire extinguisher sitting on floor in hall of B-4610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Hank Grace **Expected Date:** 6/26/95 **Comp. Date:**
Relabel r properly discard unlabeled 5 gallon container behind old control board.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/7/95 **Comp. Date:**
Position tool rest on pedestal grinder in B-4601 to be at or above centerline of wheel.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/7/95 **Comp. Date:**
Dress wheel on pedestal grinder in B-4610 to remove groove in center of wheel.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Install instruction/warning signs in B-4610 near pedestal grinder.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Install warning/instruction signs by pipe threading machine in B-4610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Install warning/instruction signs by drill press in B-4610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Install curtain or welding shield around area where welding occurs in B-4610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Replace jaws on bench vise in B-4610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Remove drill with locking trigger from B-4610 until trigger lock is removed.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
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Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 6/21/95 **Comp. Date:** 6/8/95
Remove jig saw with paddle trigger & no safety from B-4610

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/21/95 **Comp. Date:**
Perform general housekeeping in B-4610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Loading rack - replace nylon strap with chain on compressed gas cylinder outside AH#12.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 12/29/95 **Comp. Date:**
Check to make certain that with the air conditioner off in T/T loading shack that the bldg. is not depleted of oxygen if occupied.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Plug all quick opening valves in hazardous service (T/T waste pot).

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Perform housekeeping on T/T loading deck removing all tripping hazards.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Label or properly dispose contents of unlabeled container in tool container at load rack.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Support chainfall on loading filter deck with beam with marked capacity equal to or greater than chainfall. Discard rusty choker.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Perform housekeeping removing tripping hazards on loading filter deck.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Perform housekeeping on south end of T/C load rack removing tripping hazards.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Evaluate the need for a second safety shower/eyewash station on north upper deck of T/C loading rack.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Remove hazardous waste drums near T/C loading rack to designated storage area & properly dispose.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/21/95 **Comp. Date:**
Hard pipe nitrogen to waste pots on load rack.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Steve Ledoux **Expected Date:** 10/20/95 **Comp. Date:**
Install nitrogen ties with proper block & bleeds in sulfuric acid area.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/7/95 **Comp. Date:**
Emphasize to all employees the need to cover eyewash stations with nozzles when not in use.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/7/95 **Comp. Date:** 6/8/95
Reinstall area chains down on the south side of acid area.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/28/95 **Comp. Date:**
Install correct support for line at the top of first stairs at C-610.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** 7/7/95 **Expected Date:** **Comp. Date:**
D-610 deck needs housekeeping attention.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/28/95 **Comp. Date:**
Label hoists & beams in field with rated capacity.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/28/95 **Comp. Date:**
Install guard to protect against rotating parts on BL-500.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Debbie Mack **Expected Date:** 10/20/95 **Comp. Date:**
No entry instructions on the east door of AH #10. The instructions posted on the west dooor call for 2 green lights to be on before entering. There are no lights. Install proper/correct entry instructions & install green lights or change

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Debbie Mack **Expected Date:** 10/20/95 **Comp. Date:**
Install door handle on AH #7 & check to see if second green light for entry is required.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/28/95 **Comp. Date:**
Install proper support for line in the pipe rack north of T-8.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Al Shanklin **Expected Date:** 8/14/95 **Comp. Date:**
Remove Hansen fittings in shop and make all employees aware that a dedicated fitting be used for breathing air.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Al Shanklin **Expected Date:** 8/14/95 **Comp. Date:**
Label cylinders or properly discard cylinders located in gas cylinder rack north of instrument shop.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 7/7/95 **Comp. Date:**
The maintenance shop needs housekeeping attention.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/7/95 **Comp. Date:**
Plug all quick opening valves in hazardous service (D-1300, D-1302, P-1320A, etc.)

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Look at relocating intercom near dry vent in distillation, condensing, thermal area.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Install rack for fire hose north end of new train.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 10/20/95 **Comp. Date:**
Install hose racks by nitrogen stations in thermal area.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Mount fire extinguisher between T-1555A & T-1830.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 10/20/95 **Comp. Date:**
Rotate safety shower/eye wash station 2/PB-38402/CD1-450C next to T-1555B 90 degrees to remove away from platform.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Jame sCook **Expected Date:** 7/7/95 **Comp. Date:**
Housekeeping items: 1) bolts/hoses, etc. by P-1320's; 2) channel locks by T-1555B & P-1750; 3) valve handle on platform by T-1555A; 4) nuts, bolts, etc. on top of bldg. next to R-1300; 5) trash on platform in between fans EC-1540; 6) sling &

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Barry Young **Expected Date:** 7/28/95 **Comp. Date:**
Consulting engineering to see if landing platform for transition ladder on T-1830 meets all OSHA & engineering requirements.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Barry Young **Expected Date:** 7/28/95 **Comp. Date:**
Rotate ladder to the upper deck by V-170B 90 degrees to allow for unrestricted access.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Have fire department inspect fire extinguisher #98 and date.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Remove old decontamination tags on valves by fin fan coolers #2978, 2979, 2981, 2984 & 2987.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Relabel nitrogen station under fin fan.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Move access ladder on scaffold #15576 to east side of E-1430.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Steam outlet on top deck of by E1302 with no label. Label all utility steam lines.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Remove tripping hazard (scaffold bracing) on walking platform above E-1302 or use warning devise to alert people to the hazard.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Adam Michel **Expected Date:** 10/20/95 **Comp. Date:**
Install ladder gate on the short ladder down to deck M1 lines to R-1300.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY
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Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 10/20/95 **Comp. Date:**
Secure grating clips on third deck, R-1300, north side.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Label all utility stations on upper R-1300 deck, north side.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Debbie Mack **Expected Date:** 7/28/95 **Comp. Date:**
Install grating for cylinders to sit in by AH-15.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Label/number fire extinguisher on AH #14 & 15.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Al Shanklin **Expected Date:** 10/20/95 **Comp. Date:**
Install permanent support for actuator by T-1500.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Label nitrogen station on the deck by fire extinguisher #109.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Rotate safety shower & eye wash #31 90 degrees to remove tripping hazard.

List of all Follow Up Action Items

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY
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Follow-Up Action **Responsibility:** Steve Ledoux **Expected Date:** 7/28/95 **Comp. Date:**
The first step to ladder to T-251 appears to be too high. Consult with engineering to see if the distances are in compliance with OSHA & engineering standards.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Rodney Burris **Expected Date:** 8/14/95 **Comp. Date:**
Relabel hand/off/auto switch positions to P-255B.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Debbie Mack **Expected Date:** 7/28/95 **Comp. Date:**
Install grating under cylinder by AH #13 to prevent bottom corrosion.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Fonow-Up Action **Responsibility:** Julie Clebert **Expected Date:** 7/28/95 **Comp. Date:**
Quick opening valve between P1500 A&B, T-1500 to T/C not plugged. Plug all quick opening valves in hazardous service.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** James Cook **Expected Date:** 7/28/95 **Comp. Date:**
Mount alarm button on safety shower/eye wash station #28 to remove pinch point.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Donnie Dugas **Expected Date:** 7/28/95 **Comp. Date:**
Several quick opening, unplugged, valves on vent line next to P1450C. Plug valves.

Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014
CONSOLIDATED AUDIT - SAFETY

F w-Up Action **Responsibility:** Adam Michel **Expected Date:** 8/14/95 **Comp. Date:**
Audit all grating in plant for proper securement since unsecured grating found in several locations.

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Description **Type Follow-Up** Consolidated Audit **Reference #:** 500014

CONSOLIDATED AUDIT - SAFETY

Follow-Up Action **Responsibility:** Adam Michel **Expected Date:** 8/28/95 **Comp. Date:**

Nitrogen stations in block have no painted backboards as required by S&LP 313. Install painted backboards.

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