

ABERDEEN PSM AUDIT

WORKSHEETS FOR PSM STEERING TEAM INTERVIEW

COMPLIANCE AUDIT GUIDELINES SECTION 4.1 APPLICATION § 29 CFR 1910.119(a)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Is the covered process defined clearly?	x		In PSM manual.	DCS
2a. Is any portion of the plant excluded from the plant's PSM program?	x		Certain units and subunits, such as the Compound unit are excluded.	DCS
2b. Is there any documentation of technical basis for such exclusion?			There is some basis though we are not certain it serves as a technical basis.	DCS
3. Is there a list of highly hazardous chemicals whose inventories exceed threshold quantities?	x		The Operating Procedures should have this information.	DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.2 EMPLOYEE PARTICIPATION § 29 CFR 1910.119(c)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Is there evidence of formal communication to all employees about the establishment of the PSM program and identification of points of contact?	x		This was done through bulletin board postings and meetings. There may be records of these activities in the plant managers files.	DCS
2. Is there a written plan for employee participation?	x		In the PSM manual.	DCS
3. Does the plant have some form of PSM program awareness activity for all employees and associated documentation (e.g., postings, meetings, memos)?		x	No formal program exists for awareness. In the vinyl department, the focus was on training.	DCS
5. Have employees or their representatives been consulted on the development the elements of the PSM program (how are employee inputs documented and followed-up)?	x		Some consultation was done. Records may exist in either the plant managers' files or in the personnel files.	DCS
6. Do employees know how and where to gain access to information required by the PSM rule?			In general, employees ask their supervisor for information. The results of the tank farm PHA were posted.	DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.3 PROCESS SAFETY INFORMATION § 29 CFR 1910.119(d)					Initials
Suggested Questions	Yes	No	Comments for Implementation Status		
1. Are process safety information complete and up-to-date (before conducting process hazard analyses)?		x	Not all required information was complete at the start of the PHA.	DCS	
2. Are all employees provided reasonable access to all process safety information?	x			DCS	
3a. Is there chemical information for all covered chemicals (such as material safety data sheets and hazardous effects of inadvertent mixing of different chemicals)?	x		MSDS are available. Other information is available in the operating procedures and in technical data books. There is no mixing matrix; however, the plant does not believe one is needed.	DCS	
Is there information pertaining to the technology of the process:				DCS	
4. Updated process flow diagrams or block flow diagrams?		x	PFDs are in the process of being made.	DCS	
5. process description, process chemistry, maximum intended inventories, and troubleshooting information?			This information is in operating procedures and employees offices. It may not be complete.	DCS	
6. Safe upper and lower limits for process parameters and consequences of deviation (how were these information obtained)?	x		In the operating procedures.		
Is there information pertaining to the equipment in the process:	x				

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COMPLIANCE AUDIT GUIDELINES SECTION 4.3 PROCESS SAFETY INFORMATION § 29 CFR 1910.119(d)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
7. Updated P&IDs (how often are P&IDs being updated)?	x		P&IDs are redlined as needed and redrawn every 2-3 months.	CJL
8. Electrical classification for different areas (does it follow NFPA standard or comparable industry standard and is it indicated on a plot plan)?	x		This is shown on a plot plan and was reviewed by Randy Denton.	CJL
9. Design and technical basis for relief valves and/or relief headers?		x	These are kept in the "PSM" office. Not all are done, for example the New Module.	DCS
10. Technical basis for design of ventilation system (for all control buildings and process buildings and enclosures)?		x		DCS
11. Material and energy balances for all covered processes built after 5/26/92?	na			DCS
12. Description of safety systems (such as scrubbers, dikes, firewater systems, emergency generators or UPS, control systems and flares, etc.)?	x		Most of these are in the operating procedures and fire systems information is kept in the safety department.	DCS
13a. Equipment sheets and/or design files for all equipment?			These are in the "PSM" office and Mechanical records. Not all are available.	CJL
13b. Do the equipment sheets or design files of equipment include appropriate references to codes and standards used?			Some do, but some may be missing.	CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.3 PROCESS SAFETY INFORMATION § 29 CFR 1910.119(d)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
14. Is there documentation that covered equipment complies with generally accepted good engineering practices?	x	x	Check in the equipment files and in Don Whattley's office. (Whattley is the resident inspector)	CJL
15. For existing equipment designed under codes and standards no longer in use, is there documentation of tests, inspections, operating history, engineering analyses, etc. that show that the equipment is fit for duty?	x	x	Same as above.	CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.4 PROCESS HAZARD ANALYSIS § 29 CFR 1910.119(e)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1a. Has the plant established a priority order for conducting the PHAs?	x		This is found in the PSM Manual.	DCS
1b. Is there a technical basis for the priority order which takes into account the extent of process hazards, number of potentially affected employees, age of process and operating history?	X		This is found in the PSM Manual.	DCS
2. Have the scheduled number of PHAs been completed and does the schedule comply with the regulatory schedule?	x	x	The number of PHAs scheduled by the plant was not done, however, the number required by the PSM standard were done.	DCS
3. Do the PHAs reflect the complexity of process? Which methodology is being used for the PHAs?	x		The HAZOP method was used for all PHAs.	DCS
4. Has the PHA leader been appropriately trained in the specific PHA methodology?	x		The leaders were trained by the NUS Co.	DCS
Do the PHAs address the followings:				
5a. Hazards of the process:	x			DCS
5b. Previous incidents:	x			DCS
5c. Engineering and administrative controls:	x			DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.4 PROCESS HAZARD ANALYSIS § 29 CFR 1910.119(e)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
5d. Consequences of failure of engineering and administrative controls.	x			DCS
5e. Facility siting.		x		DCS
5f. Human factors; and	x			DCS
5g. Health and safety effects.	x			DCS
6. Does the plant have procedures for PHA follow-up and resolution of findings (management system such as computerized database system for tracking PHA findings)?	?	?	These may be in the PSM manual.	DCS
7. Does the plant have procedures for 5-yr PHA update?		x	The intent is to re-do the PHAs on a five year basis.	DCS
9. Does the plant retain PHA reports (and also updates and revalidation of PHA reports) for the life of the process?	x			DCS
12a. For unresolved findings, is there a schedule for resolution of findings and is the basis for the schedule technically sound?	x		There is a schedule showing projected completion dates for the findings. Most, if not all findings, are not resolved nor are they scheduled to be complete at this time.	DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.5 OPERATING PROCEDURES § 29 CFR 1910.119(f)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Does the plant have complete, accurate, and up-to-date operating procedures for all covered processes?		x	The set of procedures is 90%+ complete. Some are in draft form but not final. Procedure are in the control rooms.	DCS
2. Do the operating procedures include a step-by-step description?	x			DCS
Do the contents of the operating procedures include or refer to:				DCS
3a. Process description, PFDs, P&IDs;		x	PFDs are not included nor are they referenced.	DCS
3b. All operating phases;	x			DCS
3c. Operating limits, consequences of deviation and steps needed to correct or avoid deviation;	x			DCS
3d. Safety and health issues;	x			DCS
3e. Safety systems and their function?	x			DCS
5. Are operating procedures accessible in the control room and/or the principle work place at all times when operations personnel are present?	x			DCS
6. Does the plant have procedures in place for the annual update/revision and certification of operating procedures?		x	The plant relies on the MOC process for changes. There is no annual certification.	DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.5 OPERATING PROCEDURES § 29 CFR 1910.119(f)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
Does the plant have safe work practices in place for:				DCS
7a. Lockout/tagout:	x			DCS
7b. Confined space entry:	x			DCS
7c. Opening process equipment or piping, and	x			DCS
7d. Control over entrance to cover process area by maintenance, contractor, laboratory, or other support personnel.		x		DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.6 TRAINING § 29 CFR 1910.119(g)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Has the plant completed all the grandfathering requirements with respect to training for operations employees working in the plant on or prior to May 26, 1992?	x		These are in John Olson's office for the vinyl department and in the personnel records for the utility department.	DCS
2. Does the plant have an initial training program? Is initial training provided for each new employee and employee before being involved in operating a newly assigned process?	X X		These are in Olson's files and Safety Department files.	DCS
4. Is a description of the refresher program for operations personnel available? Is refresher training provided for operations personnel at least every three years?		x x	Work on this program is in progress.	DCS
5. Were employees consulted to determine the frequency of refresher training program?		x	This will be done.	DCS
7a. Is documentation available on the training of each employee?	x			DCS
7b. Does the training documentation include identity of employee trained, the date of training and how the results of the training were verified?	x			DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.7 CONTRACTORS § 29 CFR 1910.119(h)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1a. Does the plant have a contractor program?	X		Look in PSM Manual	CJL
1b. Does the program include all contractor activities that have the potential for affecting process safety?	X			CJL
Does the contractor program include:				
2a. Safety record evaluation (contractor selection process for evaluation with selection criteria)?	X			CJL
2b. How the contractor is informed of hazards and safe work practices;	X			CJL
2c. How the contractor is informed of applicable provisions of emergency action plan; and	X			CJL
2d. How the contractor is informed of safe work practices related to controlling the entrance, presence, and exit of contract employees and employees from covered process areas?	X			CJL
3a. Does the plant conduct periodic evaluation of the contractor employer?		X	Check with Gil Morgan (Used to do, not presently being done)	CJL
4. Does the plant maintain a site injury and illness log for contractor employees?	X			CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.7 CONTRACTORS § 29 CFR 1910.119(h)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
6. Does the plant have a generic contractor safety manual?	X			CJL
8. Does the plant have examples of information given contractors about the specific hazards associated with the covered processes? Are the contract employees informed of these hazards prior to the initiation of work at the site?	X		Safety handbook, videos, and MSDS	CJL
9. Are there booklets, badges, logbooks, or cards used to help control the entrance and exit of contractors into the covered process area?	X		Logbooks and badges used ID badges issued after contractor orientation showing renewal due date.	CJL
11. Does the plant have copies of memos or records indicating that appropriate action as taken when contractor employee safety infractions were discovered?	X		VAST (Vista Aberdeen Safety Tracking) and Safety Emphasis programs.	CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.9 PRE-STARTUP SAFETY REVIEW § 29 CFR 1910.119(i)			
Suggested Questions	Yes	No	Initials
1. Does the plant perform pre-startup safety reviews for new and modified processes? Does the plant have procedures or checklists used to perform pre-startup safety reviews?	X		DCS
Do the pre-startup safety procedures include:			
2a. Construction and equipment are in accordance with design specifications:	X		DCS
2b. Safety, operating, maintenance, and emergency procedures are in place:	X		DCS
2c. A PHA has been performed and the findings have been resolved; and	X		DCS
2d. Operator training has been completed?	X		DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.9 MECHANICAL INTEGRITY § 29 CFR 1910.119(j)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Does the plant have a written mechanical integrity program?	X			CJL
Does the mechanical integrity program include:				CJL
2a. Listing of covered equipment and instrumentation critical to process safety:	X	(X)	(Not found during audit)	CJL
(i) Pressure vessels and storage tanks:	X			CJL
(ii) Piping systems:	X			CJL
(iii) Relief and vent systems:	X			CJL
(iv) Emergency shutdown systems:	X			CJL
(v) Controls (including monitoring devices and sensors, alarms, and interlocks); and	X			CJL
(vi) Pumps:	X			CJL
2b. Routine maintenance procedures:	X			CJL
2c. Inspection and testing; and	X			CJL
2d. Quality assurance?		?	(None found during audit)	CJL
3. Do the inspection and test procedures follow recognized and generally accepted engineering practice? Does the plant have records of inspections and tests?	X			CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.9 MECHANICAL INTEGRITY § 29 CFR 1910.119(j)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
4. Do the quality assurance procedures cover fabrication, installation, maintenance materials, spare parts, and equipment?		X		CJL
5. Does the plant have a maintenance training program which includes process overview, skill training and job task procedures training for employees and contractor employees?		X		CJL
6. Does the mechanical integrity program include procedures for correcting equipment deficiencies?		X		CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.10 HOT WORK PERMIT § 29 CFR 1910.119(k)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Does the plant have a written procedure for permitting hot work?	X		In Safety & Health Manual	CJL
2. Does the hot work permit procedure and the actual hot work comply with the requirements of fire prevention and protection 29 CFR 1910.252(a) which include:	X			CJL
3. Does the hot work permit require authorization from supervisory personnel?	X			CJL
4. Is there a procedure for cancellation and/or carry-over of permits between shifts?	X			CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.11 MANAGEMENT OF CHANGE § 29 CFR 1910.119(l)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Does the plant have a written management of change program?	X		The program is described in the PSM manual.	DCS
Do the contents of the management of change program include:				
2a. Process change criteria:	X			DCS
2b. Authorization requirements:	X			DCS
2c. Evaluation procedure:	X			DCS
2d. Technical basis for proposed change, and	?	?	This may not be in the MOC process.	DCS
2e. Impact of change on safety and health?	X			DCS
3. Do the management of change procedures trigger appropriate modifications to process safety information and operating / maintenance procedures?	x			DCS
4. Has required training been completed for affected employees before the intended process change is implemented?	x			DCS
5. Is there evidence of communication to the employees of the existence of the management of change program and how to use it?	?	?	Communication was done but there may not be records of it being done.	DCS

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COMPLIANCE AUDIT GUIDELINES SECTION 4.12 INCIDENT INVESTIGATION § 29 CFR 1910.119(m)					Initials
Suggested Questions	Yes	No	Comments for Implementation Status		
1a. Does the plant have written incident investigation procedures? Does the procedures require that investigations are started within 48 hours of incident and specify criteria for selecting team members?	X			CJL	
1b. Do the incident investigation procedures cover near-misses?	X			CJL	
Does the incident investigation procedure include:					
2a. Incident recognition and reporting (any awareness activity);	X		Safety meetings and posted notices	CJL	
2b. Incident investigation report;	X			CJL	
2c. Resolution of incident investigation findings (procedures for acting on findings and tracking their resolution);	X			CJL	
2d. Report review by affected persons; and	X		Not well documented	CJL	
2e. Retention of reports for a five year period?	X			CJL	
5/6. Is there a procedure to incorporate incident investigation findings into the plant's training program and operating/maintenance procedures?		X		CJL	

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COMPLIANCE AUDIT GUIDELINES SECTION 4.13 EMERGENCY PLANNING AND RESPONSE § 29 CFR 1910.119(n)				
Suggested Questions	Yes	No	Comments for Implementation Status	Initials
1. Does the plant have a written emergency action plan as required by 29 CFR 1910.38(a)? Is the plan or its applicable parts reviewed with new employees and contractor employees; and available for all employees?	X X X		In Safety & Health Manual	CJL
Does the facility maintain an alarm system which meets the following criteria:				
3a. The alarm system must be capable of being perceived above ambient noise or light levels by all employees in the affected areas of the workplace.		X	Areas around Joy compressors too noisy to hear alarm clearly.	CJL
3b. The alarm must be distinctive and recognizable as a signal to evacuate or to perform designated actions under the emergency plan.	X			CJL
4. Does the plant have a fire prevention plan as required by 29 CFR 1910.38(a)?	X			CJL
5. Is the implementation of the emergency action plan (including employee orientation and training) completed? Does the plant maintain records of employee training?	X X		Records in safety office	CJL

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COMPLIANCE AUDIT GUIDELINES SECTION 4.13 EMERGENCY PLANNING AND RESPONSE § 29 CFR 1910.119(n)			
Suggested Questions	Yes	No	Comments for Implementation Status
6. Does the emergency response plan include procedures for handling small releases?	X		
			Initials CJL

COMPLIANCE AUDIT GUIDELINES SECTION 4.15 TRADE SECRETS § 29 CFR 1910.119(p)			
Suggested Questions	Yes	No	Comments for Implementation Status
1. Is the plant claiming any trade secrets?		X	
2. If the plant is claiming trade secrets, are procedures available for dealing with trade secrets (such as confidentiality documents)?			
			Initials DCS