

*RSJG
mmm
JS*

December 30, 1992

To: Herman Waltemate Cleveland
From: Bill Fultz Pedricktown

Subject: Pedricktown Safety Audit - October 5-9, 1992

Attached is our first audit progress report. It gives the status of the items that you identified during the October audit as requiring attention. Our next progress report is due by 3/31/93. All items will be completed by October, 1993.

cc: Joe Blackburn
Pat Ferraro
John Fletcher
Jim Kiel
Al Matyger
Ed McKinley
Art McMillian
~~Dennis O'Keefe~~
Carl Stolfo
Ron Szmerda
Bill Wagner
Tom Worrell

*Jan,
Please post,
circulate & return
copy to me:
2/12/93*

*5: Comp
6: IN Prog
1: INC*

NGC 12739

✓

PEDRICKTOWN SAFETY AUDIT
OCTOBER 5-9, 1992

1992 Items to Be Corrected

SA-1992-1

A management system for the auditing of individual employees with regard to Lockout, Hot Work, Vessel Entry and Forklift Trailer Entry needs to be established. These audits need to be documented.

The individual lockout audits are a requirement of OSHA Standard 1910.147 Control of Hazardous Energy (Lockout/Tagout).

Plant
Response

A system for auditing and documenting compliance with the cardinal safety rules currently exists in the Dispersion area. Similar systems are being developed in the Compound and Suspension areas and will be in place by 2/28/93. The Safety Department will audit each area to insure their systems are working.

Status

 Completed X In-Progress Incomplete

SA-1992-2

In reviewing the Compound Department's mill drill documentation, only 14 were found for 1992. Also weekly check of stopping distance could only be found for these 14.

In reviewing the Laboratory's mill drill documentation, all shifts were not conducting monthly drills.

BFG GVD Standard SA-113 requires that mill drills be conducted once per month by each shift and a check on stopping distance be conducted weekly on each mill. You need to comply with these requirements.

Plant
Response

Systems and procedures have been revised in both the Compound and Laboratory areas to assure compliance with GVD Standard SA-113.

NGC 12740

Status

 X Completed In-Progress Incomplete

SA-1992-3

In 1991 we had a potential for a serious accident at the Terre Haute plant when the kneader closure bolt on a Buss Extruder failed and was projected out with great force nearly striking a supervisor. The design of the newer Buss Extruders has been modified to prevent this accident.

You need to construct a metal guard to cover this closure bolt or verify that your Buss has the modified design. The design of this guard can be obtained through Mike DeMent of Terre Haute.

Plant
Response

We contacted Terra Haute and were told that their old Buss machines had the problem with kneader closure bolts. The current Buss design, to which ours is built, has similar bolts but additional wedge brackets on top and bottom for added reinforcement to prevent stress on closure bolts. We will purchase a torque wrench for routine operations and will consider replacing the bolts on the kneader and the RS screw on a routine PM basis. Will review with Bob Jordan to get additional support/suggestions to prevent any failures on our machine.

Status

_____ Completed X In-Progress _____ Incomplete

SA-1992-4

In 1981 Avon Lake experienced a lid blowing off a fresh VCM filter when the washers bowed and the hold down ears spread apart. I have sent a copy of this narrative report to Dennis O'Keefe. During the plant safety inspection, three retainers or cotter pins were observed missing on VCM strainers in the Suspension Area and at least 10 retainers were missing on a VCM recovery strainer in the Dispersion Area.

These hold down devices in VCM service need to be corrected and a PM program established to prevent a reoccurrence.

Plant
Response

Maintenance work orders were written to inspect and correct hold down bolts on strainers in VCM service. PM's have been written to inspect and repair these on an annual basis.

Status

 X Completed _____ In-Progress _____ Incomplete

NGC 12741

SA-1992-5

A partially filled out Safe Work Permit for a contractor was noted on a Project Engineer's desk. The permit was pre-dated for the following week. I do not have a problem with filling in some of the permit sections, but the signature indicating that hazard communications has been completed at the job site is not to be signed until after that communication has been conducted.

Plant
Response

The individual who wrote and pre-signed the hazard communication section on the Safe Work Permit has been counseled on the importance of signing the permit after all requirements have been met.

Status

 X Completed In-Progress Incomplete

SA-1992-6

In 1992 the GVD/SP&C Divisions have experienced several recordable injuries involving second degree burns. Currently, second degree burns make up 23 percent of our total recordable cases. All plants are being urged to inspect for hot surfaces (140°F) which might cause burns and take preventive measures. You need to audit the plant for hot surfaces and proceed with insulating, guarding or post warning signs.

Plant
Response

A plant audit for hot surfaces will be conducted by the end of the second quarter, '93.

Status

 Completed X In-Progress Incomplete

NGC 12742

SA-1992-7

A management tracking system which assures implementation and closure of all safety concerns needs to be established. This tracking system should include issues identified in such areas as:

PHA (HAZOP's)
Hazard Research. Inc., Inspections
IRI Inspections
New Jersey Fire Marshal Inspections
Corporate/Division Safety Audits

Plant
Response

Various tracking systems currently exist for the many types of inspections, audits, consent agreements, and internally generated corrective action plans. We have no plans to consolidate all of these into a single management tracking system. We will continue to evaluate and fine tune these systems to insure that all identified safety issues are brought to closure.

Status

X Completed In-Progress Incomplete

SA-1992-8

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

A review of all piperacks crossing roadways will be completed by 3/31/93.

Status

 Completed In-Progress X Incomplete

NGC 12743

SA-1992-9

With some of the recent major fires and explosions, the importance of a safe exit from the workplace is brought out. All of your exits need to be properly identified and illumination provided as required by OSHA Standard 1910.37(q)(6). Each of your fence line gates need to be marked as an exit, emergency exit, not an exit or be identified with its actual character (function). The fence line emergency exits need to be unimpeded and be identified in your plant evacuation procedure.

Plant
Response

A plan to comply with this item is being developed and will be completed by 1/31/93.

Status

_____ Completed X In-Progress _____ Incomplete

SA-1992-10

Lockout clips have become available for locking out 110/120 volt circuit breakers. You should obtain these lockout clips from the manufacturer of your electrical panels and require individual circuits be locked out when work is to be performed on them.

Plant
Response

Our maintenance electrical engineer has been requested to spec and purchase lockout clips for the various types of 110/120 volt circuit breakers in the plant. Once clips are available, our lockout procedure will be modified to require their use. To be completed by 3/31/93.

Status

_____ Completed X In-Progress _____ Incomplete

NGC 12744

SA-1992-11

During the plant inspection tour a maintenance employee was observed cleaning a control valve with air at line pressure. Compressed air used for cleaning needs to be reduced to 30 p.s.i., provided with chip guarding and require personal protective equipment.

Plant

Response

An OSHA approved air nozzle was installed at this air cleaning station and the employee involved was counseled.

Status

X Completed In-Progress Incomplete

SA-1992-12

The Pedricktown Community Fire Department is beginning to get involved in training their personnel in HAZMAT training. I would suggest that consideration be given to providing them with a computer program which gives hazardous chemical information and chemical spill dispersion modeling such as CAMEO. You may also wish to help set it up and provide training in the proper use.

Plant

Response

We discussed this subject with the chief of the Pedricktown fire company and he expressed interest in having a computer program like CAMEO available for use by the township. We will proceed with this recommendation. Complete by 6/30/93

Status

 Completed X In-Progress Incomplete

NGC 12745

~~ASG~~
M M M
JS
AUDIT
RICE

March 31, 1993

To: ~~Herman Waltemate~~ Cleveland

From: Bill Fultz Pedricktown

Subject: Pedricktown Safety Audit - October 5-9, 1992

Attached is our second audit progress report. It gives the status of the items that you identified during the October audit as requiring attention. Our next progress report is due by 6/30/93. All items will be completed by October, 1993.

Bill Fultz

cc: Joe Blackburn
Pat Ferraro
John Fletcher
Jim Kiel
Al Matyger
Ed McKinley
Art McMillian
Dennis O'Keefe
Carl Stolfo
Bill Wagner
Tom Worrell

Jan,
Do you have
this logged?

~~NO~~ 3:15
JAN

okay
JP

7 Comp
5 IN Prog
0 INCOMP

12

NGC 12746

✓
D

PEDRICKTOWN SAFETY AUDIT
OCTOBER 5-9, 1992

1992 Items to Be Corrected

SA-1992-1

A management system for the auditing of individual employees with regard to Lockout, Hot Work, Vessel Entry and Forklift Trailer Entry needs to be established. These audits need to be documented.

The individual lockout audits are a requirement of OSHA Standard 1910.147 Control of Hazardous Energy (Lockout/Tagout).

Plant
Response

A system for auditing and documenting compliance with the cardinal safety rules currently exists in all three manufacturing areas. The Safety Department will audit each area to insure their systems are working.

Status

X

Completed

_____ In-Progress

_____ Incomplete

SA-1992-2

In reviewing the Compound Department's mill drill documentation, only 14 were found for 1992. Also weekly check of stopping distance could only be found for these 14.

In reviewing the Laboratory's mill drill documentation, all shifts were not conducting monthly drills.

BFG GVD Standard SA-113 requires that mill drills be conducted once per month by each shift and a check on stopping distance be conducted weekly on each mill. You need to comply with these requirements.

Plant
Response

Systems and procedures have been revised in both the Compound and Laboratory areas to assure compliance with GVD Standard SA-113.

NGC 12747

Status

X

Completed

_____ In-Progress

_____ Incomplete

SA-1992-3

In 1991 we had a potential for a serious accident at the Terre Haute plant when the kneader closure bolt on a Buss Extruder failed and was projected out with great force nearly striking a supervisor. The design of the newer Buss Extruders has been modified to prevent this accident.

You need to construct a metal guard to cover this closure bolt or verify that your Buss has the modified design. The design of this guard can be obtained through Mike DeMent of Terre Haute.

Plant
Response

We contacted Terra Haute and were told that their old Buss machines had the problem with kneader closure bolts. The current Buss design, to which ours is built, has similar bolts but additional wedge brackets on top and bottom for added reinforcement to prevent stress on closure bolts. We will purchase a torque wrench for routine operations and will consider replacing the bolts on the kneader and the RS screw on a routine PM basis. Will review with Bob Jordan to get additional support/suggestions to prevent any failures on our machine. To be completed by 4/30/93.

Status

_____ Completed X In-Progress _____ Incomplete

SA-1992-4

In 1981 Avon Lake experienced a lid blowing off a fresh VCM filter when the washers bowed and the hold down ears spread apart. I have sent a copy of this narrative report to Dennis O'Keefe. During the plant safety inspection, three retainers or cotter pins were observed missing on VCM strainers in the Suspension Area and at least 10 retainers were missing on a VCM recovery strainer in the Dispersion Area.

These hold down devices in VCM service need to be corrected and a PM program established to prevent a reoccurrence.

Plant
Response

Maintenance work orders were written to inspect and correct hold down bolts on strainers in VCM service. PM's have been written to inspect and repair these on an annual basis.

Status

X Completed _____ In-Progress _____ Incomplete

NGC 12748

SA-1992-5

A partially filled out Safe Work Permit for a contractor was noted on a Project Engineer's desk. The permit was pre-dated for the following week. I do not have a problem with filling in some of the permit sections, but the signature indicating that hazard communications has been completed at the job site is not to be signed until after that communication has been conducted.

Plant

Response

The individual who wrote and pre-signed the hazard communication section on the Safe Work Permit has been counseled on the importance of signing the permit after all requirements have been met.

Status

X

Completed

 In-Progress

 Incomplete

SA-1992-6

In 1992 the GVD/SP&C Divisions have experienced several recordable injuries involving second degree burns. Currently, second degree burns make up 23 percent of our total recordable cases. All plants are being urged to inspect for hot surfaces (140°F) which might cause burns and take preventive measures. You need to audit the plant for hot surfaces and proceed with insulating, guarding or post warning signs.

Plant

Response

A plant audit for hot surfaces will be conducted by the end of the second quarter, '93.

Status

 Completed

X

In-Progress

 Incomplete

NGC 12749

SA-1992-7

A management tracking system which assures implementation and closure of all safety concerns needs to be established. This tracking system should include issues identified in such areas as:

PHA (HAZOP's)
Hazard Research. Inc., Inspections
IRI Inspections
New Jersey Fire Marshal Inspections
Corporate/Division Safety Audits

Plant
Response

Various tracking systems currently exist for the many types of inspections, audits, consent agreements, and internally generated corrective action plans. We have no plans to consolidate all of these into a single management tracking system. We will continue to evaluate and fine tune these systems to insure that all identified safety issues are brought to closure.

Status

☒

Completed

☐ In-Progress

☐ Incomplete

SA-1992-8

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

A review of all piperacks crossing roadways has been done. One by the maintenance shop and two by the tank farm will be guarded by the end of the third quarter.

Status

☐ Completed

☒

In-Progress

☐ Incomplete

NGC 12750

SA-1992-9

With some of the recent major fires and explosions, the importance of a safe exit from the workplace is brought out. All of your exits need to be properly identified and illumination provided as required by OSHA Standard 1910.37(q)(6). Each of your fence line gates need to be marked as an exit, emergency exit, not an exit or be identified with its actual character (function). The fence line emergency exits need to be unimpeded and be identified in your plant evacuation procedure.

Plant
Response

Fence line gates have been properly identified. Emergency exits are unimpeded and identified in the evacuation procedure. We are trying to find an acceptable and economical way to identify other exits with Herman's input. Should have this resolved and implemented by the end of the second quarter.

Status

Completed ☒ In-Progress ☐ Incomplete

SA-1992-10

Lockout clips have become available for locking out 110/120 volt circuit breakers. You should obtain these lockout clips from the manufacturer of your electrical panels and require individual circuits be locked out when work is to be performed on them.

Plant
Response

Lockout clips have been purchased and our lockout procedure has been modified to require their use effective 5/1/93.

Status

☒ Completed ☐ In-Progress ☐ Incomplete

NGC 12751

SA-1992-11

During the plant inspection tour a maintenance employee was observed cleaning a control valve with air at line pressure. Compressed air used for cleaning needs to be reduced to 30 p.s.i., provided with chip guarding and require personal protective equipment.

Plant
Response

An OSHA approved air nozzle was installed at this air cleaning station and the employee involved was counseled.

Status

X

Completed

 In-Progress

 Incomplete

SA-1992-12

The Pedricktown Community Fire Department is beginning to get involved in training their personnel in HAZMAT training. I would suggest that consideration be given to providing them with a computer program which gives hazardous chemical information and chemical spill dispersion modeling such as CAMEO. You may also wish to help set it up and provide training in the proper use.

Plant
Response

We discussed this subject with the chief of the Pedricktown fire company and he expressed interest in having a computer program like CAMEO available for use by the township. We will proceed with this recommendation. Complete by 6/30/93

Status

 Completed

X

 In-Progress

 Incomplete

HW
RSG
mmm
JS

June 30, 1993

To: Herman Waltemate

Cleveland

From: Bill Fultz

Pedricktown

Subject: Pedricktown Safety Audit - October 5-9, 1992

Attached is our third audit progress report. It gives the status of the items that you identified during the October audit as requiring attention. Our next progress report is due by 9/30/93. All items will be completed by October, 1993.

Bill Fultz

cc: Joe Blackburn
Pat Ferraro
John Fletcher
Jim Kiel
Al Matyger
Ed McKinley
Art McMillian
Dennis O'Keefe
Carl Stolfo
Bill Wagner
Tom Worrell

1 Complete

4 In Progress

JP

NGC 12753

PEDRICKTOWN SAFETY AUDIT
OCTOBER 5-9, 1992

1992 Items to Be Corrected

SA-1992-3

In 1991 we had a potential for a serious accident at the Terre Haute plant when the kneader closure bolt on a Buss Extruder failed and was projected out with great force nearly striking a supervisor. The design of the newer Buss Extruders has been modified to prevent this accident.

You need to construct a metal guard to cover this closure bolt or verify that your Buss has the modified design. The design of this guard can be obtained through Mike DeMent of Terre Haute.

Plant
Response

We contacted Terra Haute and were told that their old Buss machines had the problem with kneader closure bolts. The current Buss design, to which ours is built, has similar bolts but additional wedge brackets on top and bottom for added reinforcement to prevent stress on closure bolts. A torque wrench has been purchased for routine operations and a PM has been set up to inspect the kneader bolts and replace as required. Since our Buss is built to the newer design, no futher guarding is planned.

Status

 X Completed In-Progress Incomplete

SA-1992-6

In 1992 the GVD/SP&C Divisions have experienced several recordable injuries involving second degree burns. Currently, second degree burns make up 23 percent of our total recordable cases. All plants are being urged to inspect for hot surfaces (140°F) which might cause burns and take preventive measures. You need to audit the plant for hot surfaces and proceed with insulating, guarding or post warning signs.

Plant
Response

A plant audit for hot surfaces will be conducted by the end of the third quarter, '93.

Status

 Completed X In-Progress Incomplete

SA-1992-8

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

A review of all piperacks crossing roadways has been done. One by the maintenance shop and two by the tank farm will be guarded by the end of the third quarter.

Status

 Completed X In-Progress Incomplete

SA-1992-9

With some of the recent major fires and explosions, the importance of a safe exit from the workplace is brought out. All of your exits need to be properly identified and illumination provided as required by OSHA Standard 1910.37(q)(6). Each of your fenceline gates need to be marked as an exit, emergency exit, not an exit or be identified with its actual character (function). The fenceline emergency exits need to be unimpeded and be identified in you plant evacuation procedure.

Plant
Response

Fenceline gates have been properly identified. Emergency exits are unimpeded and identified in the evacuation procedure. We have identified a more economical solution to the labelling of other exits and are awaiting word from the NJ fire inspectors office on their acceptability. To be complete by the end of the third quarter.

Status

 Completed X In-Progress Incomplete

NGC 12755

SA-1992-12

The Pedricktown Community Fire Department is beginning to get involved in training their personnel in HAZMAT training. I would suggest that consideration be given to providing them with a computer program which gives hazardous chemical information and chemical spill dispersion modeling such as CAMEO. You may also wish to help set it up and provide training in the proper use.

Plant

Response

We discussed this subject with the chief of the Pedricktown fire company and he expressed interest in having a computer program like CAMEO available for use by the township. A new computer has been purchased and the software has been ordered to complete this item.

Status

 Completed X In-Progress Incomplete

NGC 12756

I N T E R O F F I C E M E M O R A N D U M

Date: 13-Sep-1993 04:31pm EDT
From: Jan Suhay
SUHAY, JAN
Dept: D/5450
Tel No: 216 447-7690

TO: KASWELL, GREG (KASWELLG@PED26@MRGATE)
TO: OKEEFE, DENNIS (OKEEFED@PED26@MRGATE)
CC: BOB GRAHEK (GRAHEK, BOB)

Subject: PEDRICKTOWN AUDIT RESPONSE DUE

THIS IS JUST A REMINDER, YOUR FOLLOW-UP AUDIT RESPONSE IS
DUE TO HERM WALTEMATE BY SEPTEMBER 30, 1993.

THANKS MUCH, JAN

CC: HERM WALTEMATE

NGC 12757

September 30, 1993

To: Herman Waltemate

Cleveland

From: Bill Fultz

Pedricktown

Subject: ~~Pedricktown Safety Audit~~ - October 5-9, 1992

Attached is our fourth audit progress report. It gives the status of the items that you identified during the October audit as requiring attention. Our next progress report is due by 10/31/93. All items will be completed by then.

W.C. Fultz

cc: Joe Blackburn
Pat Ferraro
John Fletcher
Jim Kiel
Al Matyger
Ed McKinley
Art McMillian
Dennis O'Keefe
Carl Stolfo
Bill Wagner
Tom Worrell

*Jan 1
send copies to
M. Marshall
C. Higby
R. Grahke*

*W
collected*

*2 comp
2 IN Prog*

NGC 12758

B

PEDRICKTOWN SAFETY AUDIT
OCTOBER 5-9, 1992

1992 Items to Be Corrected

SA-1992-6

In 1992 the GVD/SP&C Divisions have experienced several recordable injuries involving second degree burns. Currently, second degree burns make up 23 percent of our total recordable cases. All plants are being urged to inspect for hot surfaces (140°F) which might cause burns and take preventive measures. You need to audit the plant for hot surfaces and proceed with insulating, guarding or post warning signs.

Plant
Response

The plant audit for hot surfaces will be conducted by the end of October.

Status

 Completed X In-Progress Incomplete

SA-1992-8

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

A review of all piperacks crossing roadways has been done. One by the maintenance shop and two by the tank farm will be guarded by the end of October.

Status

 Completed X In-Progress Incomplete

SA-1992-9

With some of the recent major fires and explosions, the importance of a safe exit from the workplace is brought out. All of your exits need to be properly identified and illumination provided as required by OSHA Standard 1910.37(q)(6). Each of your fenceline gates need to be marked as an exit, emergency exit, not an exit or be identified with its actual character (function). The fenceline emergency exits need to be unimpeded and be identified in you plant evacuation procedure.

Plant
Response

Fenceline gates have been properly identified. Emergency exits are unimpeded and identified in the evacuation procedure. The more economical approach for illuminated exit signs in other plant areas did not meet state and NFPA requirements. A plan has been developed to reach full compliance by the end of 1994. Will concentrate on most critical areas first.

Status

X Completed In-Progress Incomplete

SA-1992-12

The Pedricktown Community Fire Department is beginning to get involved in training their personnel in HAZMAT training. I would suggest that consideration be given to providing them with a computer program which gives hazardous chemical information and chemical spill dispersion modeling such as CAMEO. You may also wish to help set it up and provide training in the proper use.

Plant
Response

Computer and CAMEO program have been presented to the Pedricktown fire company. Training underway.

Status

X Completed In-Progress Incomplete

HERM WALTEMADE
BOB GRAHEK
~~MIKE MARSHALL~~
JAN SUHAY

November 1, 1993

To: Herman Waltemate Cleveland
From: Bill Fultz Pedricktown
Subject: Pedricktown Safety Audit - October 5-9, 1992

Attached is our fifth audit progress report. It gives the status of the items that you identified during the October audit as requiring attention. Our final progress report will be submitted when the last remaining item is completed.

Bill Fultz

cc: Joe Blackburn
Pat Ferraro
John Fletcher
Jim Kiel
Al Matyger
Ed McKinley
Art McMillian
Dennis O'Keefe
Carl Stolfo
Bill Wagner
Tom Worrell

1 comp
1 in progress

NGC 12761

J

PEDRICKTOWN SAFETY AUDIT
OCTOBER 5-9, 1992

1992 Items to Be Corrected

SA-1992-6

In 1992 the GVD/SP&C Divisions have experienced several recordable injuries involving second degree burns. Currently, second degree burns make up 23 percent of our total recordable cases. All plants are being urged to inspect for hot surfaces (140°F) which might cause burns and take preventive measures. You need to audit the plant for hot surfaces and proceed with insulating, guarding or post warning signs.

Plant
Response

The plant audit for hot surfaces was conducted. Results have been forwarded to each area for corrective action.

Status

 X Completed In-Progress Incomplete

SA-1992-8

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

A piperack guard has been installed by the maintenance shop. A purchase order has been written and the contract is being let to install two guards at the tank farm piperack. Should be done by the end of November.

Status

 Completed X In-Progress Incomplete

December 30, 1993

To: Herman Waltemate

Cleveland

From: Bill Fultz

Pedricktown

Subject: Pedricktown Safety Audit - October 5-9, 1992

Attached is our final audit progress report. It gives the status of the items that you identified during the October audit as requiring attention. All items have been completed.

Bill Fultz / DPOK

cc: Joe Blackburn
Pat Ferraro
John Fletcher
Jim Kiel
Al Matyger
Ed McKinley
Art McMillian
Dennis O'Keefe
Carl Stolfo
Bill Wagner
Tom Worrell

*Jan Sukat
Oak Tree
Post + File*

*W.
11/17/94*

(Complete)

[Signature]

NGC 12763

PEDRICKTOWN SAFETY AUDIT
OCTOBER 5-9, 1992

1992 Items to Be Corrected

SA-1992-8

OSHA recently issued a Directive covering 1910.119 Management of Highly Hazardous Chemicals. The directive comments on the potential hazards such as pipework in risk of impact.

I would suggest a review be made of all your piperacks crossing plant roadways. This should include the support structure.

Plant
Response

A piperack guard has been installed by the maintenance shop. Two guards have been installed at the tank farm pipe-rack. This item is complete.

Status

X Completed _____ In-Progress _____ Incomplete