

LOSS PREVENTION AUDIT

Page 1

Prepared by: John Dizor, Jeff Harrison, Roy Kolder Date: 11-1-94

Reviewed by: Buck Bailey Date: 12-13-94

A=Dow Rule or Regulation

B=Good Practice/Training

C=Hazard Analysis

VII. AUDIT QUESTIONS AND ANALYSIS

Operating Discipline

REFERENCE: Operating Discipline Standard for The Operating Units of Dow U.S.A.

- A 1. Yes ☐ No ☒ Have you filled out the plant self-evaluation forms to assess your plants progress on Operating Discipline?

Please provide these forms at the pre-audit meeting.

Section II Process Technology Documentation

Section V Process Risk Management

Section VI Operating Procedures

Section VII Process Control

Section VIII Operational Reliability

Section IX Dynamic Process Information

Section XII Industrial Hygiene

Plans: Presently working on assessment per Division and Plant goals.

- A/B 2. Who has primary responsibility for the plant's Operating Discipline?
Presently Plant Superintendent.

- A/B 3. How is the written portion of the Operating Discipline program maintained? (Have this available at the audit meeting.)
Procedures are stored in the ~~MicroVax~~ Computer System "Reference Library" Training Programs (IPT) on computer and maintained by the Training Coordinator.

- A 4. Process Safety Information (OSHA 1910.119, Paragraph d)(Review the Operating Discipline Self-Evaluation on Process Technology Documentation, Process Risk Management, Industrial Hygiene.)

LOSS PREVENTION AUDIT

Page 2

- a. Is information included pertaining to the hazards of the chemicals used or produced by the process, and does the information include at least:

YES	NO	
X		• Toxicity Information
X		• PEL's
X		• Physical Data
X		• Reactivity Data
X		• Corrosivity Data
X		• Thermal and Chemical Stability Data
X		• Hazardous effects of inadvertent mixing of different materials that could foreseeably occur?

NOTE: MSDS's meeting the requirements of 29 CFR 1910.1200(g) may be used to the extent they contain the information required.

- b. Is information included concerning the technology of the process, and does it include at least:

YES	NO	
X		• A block flow diagram or simplified process flow diagram? <u>Mod Graphics, IPT</u>
X		• Process Chemistry? <u>IPT</u>
X		• Maximum intended inventory? <u>IPT & Emergency Plan</u>
X		• Safe Upper and Lower Limits? <u>Operating Parameters - Log Sheet</u>
	X	• An evaluation of the consequences of deviations?

(If the original technical information no longer exists, it may be developed in conjunction with the Process Hazard Analysis.)

- c. Is information included pertaining to equipment in the process, and does it include at least:

YES	NO	
X		• Materials of Construction? <u>IPT</u>
X		• Piping and Instrument Diagrams (P&ID's)?
X		• Electrical Classification?
X		• Relief System Design and Design Basis? <u>Engineering</u>
	N/A	• Ventilation System Design?
X		• Design Codes and Standards Employed?
X		• Material & Energy Balances for Processes Built after 05/26/92?
X		• Safety Systems (e.g., interlocks, detection or suppression systems)

(Revised 02/18/94; cmk)

3/28/95; LAD:bwb

DO A 047026
CONFIDENTIAL

LOSS PREVENTION AUDIT

Page 3

- A 5. Operating Procedures (OSHA 1910.119, Paragraph f) (Refer to Operating Discipline Self-Evaluation on Operating Procedures)

Yes ☒ No ☐ Do written operating procedures exist for each process?

Yes ☒ No ☐ Do the procedures provide clear instructions for conducting activities safely?

Do the operating instructions address, as a minimum, steps for each operating phase, including?

YES	NO	
X		• Initial Start-up?
X		• Normal Operations?
	X	• Temporary Operations?
	X	• Emergency Shut Downs?
	X	• Conditions Requiring Emergency Shut Down?
	X	• Assignment of Shut Down Responsibility to Qualified Operators?
	X	• Emergency Operations?
X		• Normal Shut Down?
X		• Start-ups following a turnaround or emergency shut down?

Yes ☒ No ☐ Are operating procedures readily accessible to employees who work in or maintain a process?

Yes ☒ No ☐ Are operating procedures reviewed as often as necessary to assure that they reflect current operating practice?

- A/B 6. Yes ☒ No ☐ Does the plant have a training process to keep people current on Operating Discipline?

Plans: MOC process and 3-year retraining/certification per PSM
Communication System with documentation.