



Date 26 September 1980

INTEROFFICE
MEMORANDUM

Subject Process Hazards Reviews
Chemicals Group - Fiscal 1981
Special Procedural Requirements

To Distribution

From M. R. Chmura

(Location, Organization, or Department)

Chemicals Manufacturing

(Location, Organization, or Department)

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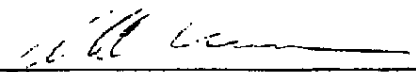
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The schedule for conducting Process Hazard Reviews (PHR's) on existing manufacturing facilities has been established. The purpose of this memo is to transmit special procedural requirements which must be followed on all PHR's on existing manufacturing facilities in the Chemicals Group. These requirements are in addition to any requirements specified by APCI corporate procedures. These special requirements have been developed and reviewed with facility managers and are intended to improve the PHR methodology. The procedural requirements are as follows:

1. The PHR team leader is responsible for coordinating with the facility manager to provide competent experienced secretarial help (not temporaries of marginal or unknown competence!) to support the PHR team while they are on site. The objective is to document development of recommendations on a daily basis so that the recommendation section of the PHR (the "meat" of the PHR) will be available for review and transmittal before the team leaves the plant site.
2. The PHR team should make an estimate of what they believe is the cost of each recommendation involving capital or process changes. It is not the intent to provide a highly accurate definitive estimate. The intent is to bracket the PHR team's understanding of order of magnitude cost impact as a management information tool to aid in expediting implementation.
3. The PHR team should make an estimate of what in their opinion would be a reasonable time schedule (completion date) for implementation of each recommendation. This timetable should consider the seriousness of the hazard represented by the recommendation. The timetable (completion date) should be based on the assumption that normal approval will be encountered on obtaining any required funding.
4. Accountability for implementation should be established for each recommendation. This accountability should be to a specific individual and not to a position.
5. The recommendation section of the PHR must be formally transmitted to the facility manager before the PHR team leaves the site. Before this formal transmittal is made, it is the responsibility of the PHR team to meet with the facility manager and/or his delegates to review in depth the teams' findings and recommendations. This review should be used to clearly define priorities of hazards and to resolve any misunderstandings. The entire PHR team should participate in this review. It is the intent of this review to provide the opportunity for the facility manager to give insight to the teams' recommendations prior to formal transmittal of the recommendations.
6. The "clock" for taking action on the PHR items starts running with transmittal of the recommendations prior to the team leaving the site. This should eliminate the excessive delays which have occurred in the past while waiting for preparation of the final report.

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7. The order of importance (i.e., priority) which the PHR team places on the recommendations should be clearly established. It should be immediately evident to anyone who reviews the recommendations which items the team believes are critical and represent the greatest hazard. It is the intent to develop a "weighting" system on recommendations, so that monthly reporting on implementation of recommendations will quickly and clearly show progress on critical items rather than simply a percentage of completion of total recommendations.
8. The recommendations should be segregated into categories (i.e., equipment changes, procedural and PM items, engineering study) and typed on the normal exception report format when they are transmitted. This will facilitate monthly exception reporting without retyping. The PHR team leader should transmit a copy of the recommendation section to the following in addition to the facility manager:
 - (a) Plant Superintendent
 - (b) Manager of Manufacturing (A. K. McMillan)
 - (c) Manager of Safety, Chemicals Group (M. R. Chmura)
 - (d) Business Area Manager which the facility serves.


M. R. Chmura

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