

PROCESS SAFETY AND LOSS PREVENTION AUDIT

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Management of Process Change/Project Reviews

MANAGEMENT OF CHANGE

REFERENCES: U.S. Area Standard No. 2, OSHA 1910.119 (I)

- A 1. Yes ☒ No ☐ Does your plant's program for Management of Change include a written procedure which complies with Dow's U.S. Area Standard No. 2?
- A 2. When was your last audit for compliance with the Management of Change Standard? (Date) First audit due in 1994.
- Please furnish documentation of your last audit findings. - Not available yet
- B 3. What is the involvement of your operation and maintenance personnel in the Management of Change process? They have been trained and are a part of the Cl2/Cell Service plant checksheet.
- A 4. Please provide documentation of several completed checklists used for process changes.
- A 5. Yes ☒ No ☐ Are all employees, Dow as well as contractor, informed of and trained for process changes that affect them prior to the initiation of the change?
- How? Formal training sessions, tailgates, and safety meetings.

Management of Process Change/Project Reviews

PROJECT REVIEWS

REFERENCES: Minimum Requirements, U.S. Area Standard No. 2

- A 1. Yes ☒ No ☐ Does your department have Engineering Project Reviews or other Project Review Processes?

Who is involved? Project team members, operations, maintenance, safety, environmental, etc.

- B 2. Describe your process for handling recommendations from the project reviews. Currently there is no formal process. Process is now in the developmental stage. (similar to USCR followups)

Please furnish documentation for the follow-up from these recommendations.

- B 3. Describe how new projects are integrated into the plant's operating discipline. Training, tailgates, updating plant resources, new and/or modified procedures, P&ID updates, Control programs, etc.

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E. Pre-Startup Safety Review

REFERENCES: Site Specific Standards, Dow Minimum Requirements,
June 1989, OSHA 1910.119 (i)

- A 1. Yes ☒ No ☐ Do you have a Pre-startup Safety Review for all new facilities or changes to existing facilities?

Plans: S&LP standard C-6

- A 2. Do the pre-startup reviews address the following:

- a. Yes ☒ No ☐ Construction and equipment in accordance with design specifications?

Plans: _____

- b. Yes ☒ No ☐ Safety, operating, maintenance and emergency procedures are in place and are adequate?

Plans: _____

- c. Yes ☐ No ☒ Have the recommendations from the project review process been closed out (completed or considered)?

Plans: No formal process

- d. Yes ☐ No ☒ Recommendations from the plant Process Hazard Analysis have been resolved and implemented prior to startup?

Plans: No HAZOP reviews

Please provide documentation for 2.a.b.c.d.

- A 3. Yes ☒ No ☐ Do you verify that training for all employees involved in operating the process has been completed prior to start up?

Plans: Training documentation form in PC's

Please provide documentation.