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PSM AUDIT

IMPROVEMENT OPPORTUNITIES LOUISVILLE PVC FACILITY

1994

ELEMENT	IO#	DESCRIPTION	RESPONSIBILITY	TARGET DATE
Application 1910.119(a)	✓ A9401	Develop an index for the plant's PSM program which includes the logic for including and excluding processes and person/position responsible for managing the program.	Complete	
Employee Participation 1910.119(c)	EP9402 OK	Recommend that SA-809 employee participation procedure be revised to more clearly outline how employees are consulted for their participation in the PSM program.	complete	
Process Safety Information 1910.119(d)	PSI9403	Include current VCM MSDS, electrical classification drawing in the process information file. Also add VCM spheres to block flow diagram. OK	STILL OPEN IN PROGRESS	I P
	✓ PSI9404	Develop a comprehensive index to the process information filing system to address each subpart of this paragraph.		
Process Hazard Analysis 1910.119(e)	✓ PHA9405	Document rationale for priority utilized to complete HAZOP's.	Complete 1/4/95	
	PHA9406 OK	Provide a system to resolve PHA recommendations in a timely manner and communicate findings to appropriate plant people.	Complete documentation	MOC column to verify
	PHA9407	Previous incidents are being considered, but this action is not always documented nor is an explanation of how the information will be included.	documentation of narratives considered	I
	PHA9408	Recommend that as PHA's are conducted any applicable engineering standard or code referenced in HAZOP be documented.	use as cover page information	I
Operating Procedures 1910.119(f)	✓ OP9409	Certify annually all operating procedures represent actual field operations and current technology.	complete	
	✓ OP9410	Address consequences of process deviation and steps required to correct or avoid these deviations.	on going as policies & procedures are updated	