

June 29, 1992

VISTA

Docket Office
Docket S-026A
Room N2625
US Department of Labor, OSHA
200 Constitution Avenue, NW
Washington, DC 20210

Dear Sirs,

Vista Chemical Company is a petrochemical manufacturing company with \$750 million in annual sales. Vista's main product lines include ethylene, vinyl chloride, polyvinylchloride, linear alkylbenzene, and oleochemical-based alcohols. There are seven Vista Chemical Company facilities to which this rule applies. The seven facilities employ approximately 1400 people. As such Vista is significantly impacted by 29 CFR 1910.119, Process Safety Management of Highly Hazardous Chemicals. We, therefore, offer the following comments on the need for OSHA to reconsider the compliance dates for paragraphs (f), (h), (j), and (l) of the rule.

Background

Vista Chemical is committed to implementing an effective Process Safety Management program. We believe that a PSM program must be developed and implemented by the employees who are most familiar with our systems and processes and who have a stake in the effectiveness and efficiency of the program. This approach helps to ensure that the various PSM elements can be integrated into our existing procedures and programs. It also raises awareness and helps build support for the program among employees.

Over the past few months, each of our seven affected locations have developed plans to expedite implementation of the various PSM elements. The results show that some additional stay of each of the four paragraphs is justified and needed. An explanation for each is provided below.

Operating Procedures - paragraph (f):

Vista believes that the compliance date for this paragraph needs to be stayed until at least September 26, 1993. The additional time is needed due to the size of the effort required to develop quality procedures that meet all requirements of the regulation.

US Department of Labor, OSHA
June 29, 1992
Page 2

At our largest facility, we embarked upon a program in 1991 to completely revise and update our operating procedures in accordance with the proposed regulation. It was decided that the best method of doing this would be to utilize experienced operators to work full time on the procedures until they are complete. Since this effort was expected to take some time, additional operating staff was hired and trained to enable the experienced operators to be taken off shift to write procedures. While the new personnel were being trained, guidelines and policies were developed for writing, reviewing, approving, and revising operating procedures. In January 1992, eight experienced operators were reassigned to begin writing procedures. Based on our progress to date, we expect that all operating procedures will be completed by July 1993 using a group of eight operators full time.

Three of our other locations indicate that they will be able to complete their operating procedures by September 1993 following a similar program. The remaining locations project completion by July 1993.

We believe that hastily throwing together operating procedures to meet the stayed compliance date of August 1992 is a mistake. While certainly being less costly and time consuming, this approach would not produce the procedures that are sufficiently detailed and accurate to be used effectively by operators. Based on our experience we believe that a sound, effective program that fully meets the regulatory requirements will take 18 to 24 months to implement.

For these reasons, the compliance date should be stayed further until at least September 1993.

Contractors - paragraph (h):

Vista supports the CMA's proposed compliance date of February 26, 1993. Additional time is necessary for Vista to bring existing programs in line with the requirements of the process safety regulation. The most significant requirement for Vista is the development of a program to periodically evaluate the performance of contract employers. Our experience with developing other audit programs indicate that six months or more is required to develop, review, and implement such programs. As our efforts to date at most Vista locations have focused on other requirements of this paragraph, work on the contractor evaluation program is just beginning.

Therefore, OSHA should further stay the compliance date for the contractor paragraph until February 26, 1993.

US Department of Labor, OSHA
June 29, 1992
Page 3

Mechanical Integrity - paragraph (j):

Vista believes a further stay of the mechanical integrity compliance date is required. Mechanical integrity is one of the most important elements of a good process safety program. To successfully implement an effective mechanical integrity program as defined by paragraph (j) of the regulation is an enormous undertaking for our company. In many ways we see this effort being similar in size and scope to the process safety information element which has a 5 year phase-in schedule. As we understand it, mechanical integrity applies not only to critical equipment but to all pressure vessels, storage tanks, piping systems, relief and vent systems and devices, emergency shutdown systems, controls, and pumps. This encompasses thousands of pieces of equipment and hundreds of piping systems. Based on our work so far, it will take a considerable effort to merely compile the list of equipment and the associated documentation. Once this is complete, a determination must be made of the appropriate inspection methods and frequencies for each of these based on historical experience and good engineering practices. Some of this work can be done with the help of resources outside the company but most of it can only be accomplished by people within the company who are familiar with Vista's processes and our plant equipment.

In addition, written procedures need to be revised or developed for the inspection and testing methods, for quality assurance programs, and for specific maintenance procedures.

Finally, employees need to be trained on the newly developed or revised procedures that are applicable to their jobs.

Our preliminary estimate of the effort required to implement a sound mechanical integrity program indicates it will take 5 people working full time at our largest facility until July 1995. Since much of the work can only be done by individuals who are very familiar with our systems, equipment and processes, we believe it is unrealistic to expect compliance any sooner. Consequently, OSHA should further stay the compliance date for mechanical integrity until July 26, 1995.

Management-of-Change - paragraph (l):

Vista believes that the compliance date for the management-of-change element should be stayed until at least October 1992. Vista has placed a high priority on developing and implementing a management-of-change procedure at each facility affected by the PSM regulation. Work on this element began in 1991. Even with this early effort we do not expect to complete implementation at all locations until October 1992. Currently we have developed and implemented management-of-change procedures at two of the seven affected

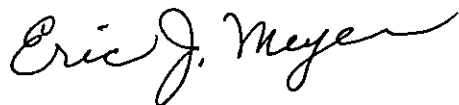
US Department of Labor, OSHA
June 29, 1992
Page 4

locations within Vista. Our limited experience indicates that six to eight months is required to develop the details of a procedure that will work at a particular location. Each location has slightly different organizations and systems into which the management-of-change procedures must be integrated.

Once a procedure has been developed, people must be trained in its purpose and use. This can take several months as the MOC procedure affects so many people and has such an impact on the day-to-day operation of a facility.

After training is completed, the procedure can be implemented. However, we expect that a MOC procedure will undergo considerable revisions throughout the years following its implementation as operating ranges are better defined and as operating and maintenance procedures are updated and documented.

For these reasons we believe it takes at least 9 to 12 months to initially develop and implement a workable MOC system and that a much longer period may be required to achieve a fully effective and efficient system. Since we began work on this element last year we could support a compliance date as early as October 1992. However, we recognize that other companies may have only begun work on management-of-change earlier this year and therefore a compliance date of February 1993 would be more reasonable.



Eric J. Meyer
Chief Process Engineer - Process Safety