



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

112 (r) Inspection Checklist -40 CFR Part 68

SUBPART A - GENERAL INFORMATION

Facility Name: DuPont Belle Plant

Mailing Address: 901 West Dupont Avenue
Belle, WV 25015

Physical Address: same as above

County: Kanawha

Premise No. (if applicable): _____

Facility Phone Number: (304) 357-1000

Facility Contact: Mr. Timothy A. Albert,
Site EH&S Mgr

Contact's Phone Number (304) 357-1042

E-mail address: tim.a.albert@usa.dupont.com

Website address: _____

Is facility subject to OSHA PSM? Yes

What is/are the process program level(s)? 3

Is facility using administrative controls? Yes

Are administrative controls documented and followed properly? Yes

Has the facility met requirements for the management system specified in 40 CFR § 68.15? Yes

SUBPART B - HAZARD ASSESSMENT

- a. Worst case scenario(s)
- b. Alternative release scenario(s)
- c. Five-year accident history (Facility may show no accidents; on-site and off-site history should be documented)

SUBPART D - PREVENTION PROGRAM FOR PROGRAM 3 FACILITIES (check to ensure that the following are documented and updated)

1. PROCESS SAFETY INFORMATION - 68.65

- a. MSDS for all regulated substances
- b. Flow/block diagram of process(es)
- c. Process chemistry
- d. MaXimum intended inventory of regulated substances
- e. Safe upper and lower temperatures, pressures, flows, and compositions
- f. Evaluation of consequence of deviation from limits
- g. Material of construction for equipment in process
- h. Piping and instrumentation diagram P&IDs
- i. Electrical classification
- j. Relief system design and design basis
- k. Ventilation system design
- l. Design codes and standards employed
- m. Material and energy balances (for source constructed after June 21, 1999)
- n. Safety systems (interlocks, suppression, and/or detection)



- o. (X) Process equipment complies with generally accepted good engineering practices, state and federal design rules

2. PROCESS HAZARD ANALYSIS - 68.67

- a. (X) Identify hazards associated with process
- b. (X) Process meets all state and federal design rules or industry stds if applicable
- c. (X) Results of analysis documented and problems resolved
- d. (X) Review updated every 5 years

NOTE: an internal team sets the time interval for PHAs based on experience, complexity, etc.; at no time can be >5years.

3. OPERATING PROCEDURES - 68.69

- a. (X) Written operating procedures for each covered process as required by 68.69
- b. (X) SOPs updated whenever major change occurs and prior to startup of the changed process
- c. (X) SOPs for maintenance activities, including lockout/tag out, confined space entry, opening process equipment and piping, and other activities

4. TRAINING - 68.71

- a. (X) Documentation of proper employee training, including initial and refresher training a minimum of every three years on process and emergency response if applicable
- b. (X) Operators are trained in new procedures prior to startup of process after a major change

5. MECHANICAL INTEGRITY - 68.73

- a. (X) SOPs for ensuring mechanical integrity
- b. (X) Employee training for process maintenance activities
- c. (X) Inspection and testing on process equipment pressure vessels and storage tanks, piping systems, relief valves and vent systems, emergency shutdown systems, controls, monitoring devices, alarms, and pumps
- d. (X) Inspection and testing follow recognized and generally accepted good engineering practices
- e. (X) Frequency of testing and inspections consistent with manufacturer's recommendations and good engineering practices

NOTE: all Ammonia detectors are checked quarterly; units at barge dock checked prior to unloading.

NOTE: the Refrigeration system for the Ammonia Storage Tank is maintained by the Contractor (YORK)

6. MANAGEMENT OF CHANGE - 68.75

- a. (X) Procedures that document basis for change, impact on health and safety, and modifications to SOPs before change implemented
- b. (X) Employees aware of change and trained in new SOPs
- c. (X) Employees and contractor involved in potential changes that may affect their job tasks (Employee Interview)

NOTE: a panel (which may include Company Specialists from other facilities or HQ) reviews MOCs. The procedure requires Operator representation on the panel.

7. PRE-STARTUP REVIEW - 68.77

- a. (X) Construction and equipment in accordance with design specifications
- b. (X) Safety, operating, maintenance, and emergency procedures are in place and adequate
- c. (X) Process hazard analysis conducted with recommendations and resolutions
- d. (X) Employees trained in new process(es)

8. COMPLIANCE AUDITS - 68.79

- a. (X) Owner/operator certified that they evaluated compliance once every three years by person knowledgeable of process
- b. (X) Findings documented, reviewed with employees, and retained for five years

NOTE: Facility procedure requires review of all PSM/RMP elements on an 18 month cycle for all operating units.

9. INCIDENT INVESTIGATIONS - 68.81

- a. (X) Accidents with or potential for catastrophic releases have been investigated within 48 hours following incident
- b. (X) Findings documented, reviewed with employees, and retained for five years

10. EMPLOYEE PARTICIPATION - 68.83

- a. (X) Owner/operator has written plan for employee participation
- b. (X) Employees aware of risk management program, hazard analyses, and process safety management

11. HOT WORK PERMITS - 68.85

- (X) Hot work permits issued for work near or in affected process(es)

12. CONTRACTORS - 68.87

- a. (X) Contractors informed of potential fire hazard and/or toxic release hazard associated with affected process(es)
- b. (X) Contractors aware of emergency action plan
- c. (X) Owner/operator developed procedures for control of contractors in to and out of affected process(es)

SUBPART E - EMERGENCY RESPONSE PROGRAM

- a. (X) Facility coordinated with LEPC, fire department or other local agencies
- b. (X) Facility has Emergency Response Plan (if appropriate)
- c. (X) Employees are aware of Emergency Response Plan (determine through employee interviews)
- d. (X) Is facility included in community emergency response plan? (Program 2 and 3 facilities)

Facility dispersion modelling program uses real-time meteorological data from a local State maintained station across the river from plant.

Facility participates in the Kanawha-Putnam Counties Mutual Aid Agreement.

SITE SECURITY

The facility has conducted a Site-Vulnerability-Analysis. Work was underway during my inspection to implement the findings. At the Ammonia (atmos) Storage Tank, a separate chain-link fence was being installed with CCTV monitoring, about 12 additional Ammonia Detectors, and a barricade wall was built to obscure the view (from outside the property perimeter fence, which completely encircles the facility including along the river frontage) of the Tank outlet piping.

Facility Staff at Meeting

Tim Albert, contact info listed above
Will Bobinger, PSM Leader x 1763
Tom Keefer, ERCoordinator x 1359

Observations & Recommendations

There were no recommendations of consequence. The facility is another example of an older plant with good PSM and RMP program management, probably reflecting responsible Corporate guidance.

Date: Inspection: 11/06/03

Report: 12/24/03

Inspector's Name: A. J. Baginski, P.E.

Signature: 