Recommendation Text:
Develop and implement a program for the identification and management of hazards in nonroutine situations. Ensure that this program covers the following:
- Operations following an emergency shutdown.

Board Status Change Decision:

A. Rationale for Recommendation

This recommendation was issued pursuant to CSB’s investigation of the August 13, 2003 hydrogen fluoride release incident at the Honeywell International, Inc. Baton Rouge facility, which exposed two workers. At the time of the incident, workers were preparing to restart the refrigeration unit that had undergone an emergency shutdown; they were removing liquid HF from a vaporizer, a non-routine activity for which there was no standard operating procedure. Operators adapted a generic procedure and added references for HF handling, none of which contained specific instructions for identifying and controlling hazards. The CSB concluded that the highly hazardous nature of HF warranted more specific procedures and job planning to ensure the safety of the draining operation.

B. Response to the Recommendation

Honeywell reported that its procedures require the conduct of a job safety briefing for new jobs or jobs for which an existing standard operating procedure cannot be followed or does not exist and a highly hazardous chemical, such as HF, is involved. Honeywell also reported that all unit restarts after shutdowns are subject to Pre-Startup Safety Reviews (PSSRs); PSSRs are required regardless of whether the shutdown was planned or unplanned and regardless of whether the process is covered by OSHA’s Process Safety Management (PSM) standard.

C. Board Analysis and Decision

Because Honeywell reports actions consistent with the intent of the CSB’s recommendation, the Board voted to change the status of this recommendation to “Closed- Acceptable Action.”