



Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Richard C. Loeb *RCL*

Cc: Leadership Team
Mark Kaszniak
Christina Morgan

Subject: Board Action Report – Notation Item 2013-15

Date: February 26, 2013

On February 14, 2013, the Board approved Notation Item 2013-15, thereby designating Recommendation 2010-6-I-WV-R13, to E. I. du Pont de Nemours and Company (from the DuPont Belle investigation), with the status of Closed – Acceptable Action.

Voting Summary – Notation Item 2013-15

Disposition: APPROVED

Disposition date: February 14, 2013

	Approve	Disapprove	Calendar	Not Participating	Date
R. Moure-Eraso	X				2/05/2013
M. Griffon	X				2/20/2013
B. Rosenberg	X				2/14/2013



U. S. Chemical Safety and Hazard Investigation Board RECOMMENDATIONS STATUS CHANGE SUMMARY

Report:	DuPont Corporation Toxic Chemical Releases
Recommendation Number:	2010-6-I-WV-R13
Date Issued:	October 17, 2011
Recipient:	E. I. du Pont de Nemours and Company (DuPont)
New Status:	R13: Closed – Acceptable Action
Date of Status Change:	February 14, 2013

Recommendation Text:

Revise the DuPont PSM standard to require confirmation that all safety alarms/interlocks are in proper working order (e.g., not in an active alarm state) prior to the start-up of all Higher-Hazard Process facilities.

Board Status Change Decision:

A. Rationale for Recommendation

This recommendation was issued pursuant to the CSB's investigation of three accidents which occurred over a 33-hour period at the DuPont Corporation's Belle, West Virginia, chemical manufacturing plant in January 2010. As part of its investigation, the CSB also reviewed DuPont corporate policies pertaining to process safety management with respect to alarm management and found a lack of appropriate guidance for addressing alarms present during start-ups.

B. Response to the Recommendation

DuPont modified and updated its corporate PSM standard and policy to require confirmation that all safety alarms and interlocks are not in an active alarm state (i.e., abnormal alarm conditions) prior to and during all start-ups involving Higher Hazard Processes and has communicated this revision to all its plant sites. This new specification was also added to DuPont's formal 1st and 2nd party PSM auditing processes to measure performance in all audits initiated after January 1, 2012.

C. Board Analysis and Decision

DuPont's actions as described meet the intent of the recommendation; therefore the Board voted to change the status of CSB Recommendation No. 2010-6-I-WV-R13 to: "**Closed—Acceptable Action.**"