

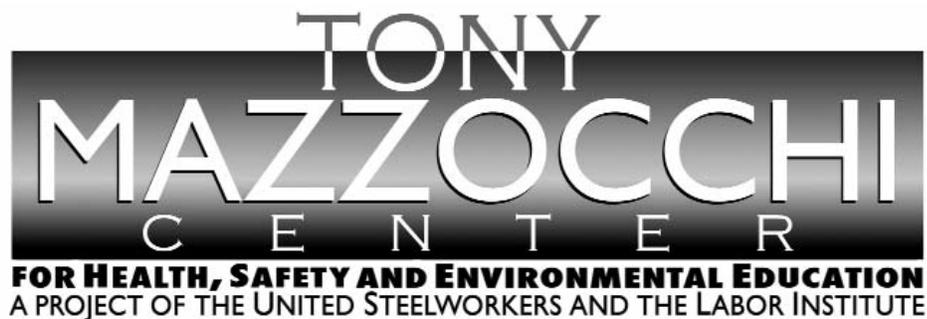


## Workers Put at Risk to Benzene Exposure

### Purpose

To share “lessons learned” gained from incident investigations through a small group discussion method format.

To understand “lessons learned” through a Systems of Safety viewpoint.



This material was produced by the Labor Institute and the United Steelworkers International Union under grant number SH-17045-08-60-F-42 Susan Harwood Training Grant Program, for the Occupational Safety and Health Administration, U.S. Department of Labor. It does not necessarily reflect the views or policies of the U.S. Department of Labor, nor does mention of trade names, commercial products or organizations imply endorsement by the U. S. Government.

**Lessons Learned**

**Volume 08, Issue 65**

**© 2008 The Labor Institute**

## Background Information

Before beginning this Lessons Learned, please review this and the next page which contain information that will introduce the concepts of Lessons Learned and Systems of Safety.

Creating a safe and healthy workplace requires a never ending search for hazards that sometimes are not obvious to us. These hazards exist in every workplace and can be found by using various methods. Lessons Learned are just as the name suggests: learning from incidents to prevent the same or similar incidents from happening again.

**Systems Are Not Created Equal: Not equal in protection and not equal in prevention.**

Using our Systems Focus to uncover system flaws or root causes is only one part of controlling hazards. We also need to look at the systems involved to decide on the best way to deal with the problem. The most effective way to control a hazard is close to its source. The least effective is usually at the level of the person being exposed. The system of safety in which the flaw is identified is not necessarily the system in which you would attempt to correct the flaw.



Major Safety System	Design & Engineering	Maintenance & Inspection	Mitigation Devices	Warning Devices	Training & Procedures	Personal Protective Factors
Level of Prevention	Highest—the first line of defense	Middle—the second line of defense			Lowest—the last line of defense	
Effectiveness	Most Effective	←————→			Least Effective	
Goal	To eliminate hazards	To further minimize and control hazards				To protect when higher level systems fail
<b>EXAMPLES OF SAFETY SUB-SYSTEMS**</b>	<b>Technical</b>	Inspection and Testing	Enclosures, Barriers Dikes and Containment	Monitors	Operating Manuals and Procedures	Personal Decision-making and Actions HF
	Design and Engineering of Equipment, Processes and Software	Maintenance	Relief and Check Valves	Process Alarms	Process Safety Information	Personal Protective Equipment and Devices HF
	Management of Change (MOC)**	Quality Control	Shutdown and Isolation Devices	Facility Alarms	Process, Job and Other Types of Hazard Assessment and Analysis	Stop Work Authority
	Chemical Selection and Substitution	Turnarounds and Overhauls	Fire and Chemical Suppression Devices	Community Alarms	Permit Programs	
	Safe Siting	Mechanical Integrity	Machine Guarding	Emergency Notification Systems	Emergency Preparedness and Response Training	
	Work Environment HF				Refresher Training	
	<b>Organizational (must address a root cause)</b>				Information Resources	
	Staffing HF				Communications	
	Skills and Qualifications HF				Investigations and Lessons Learned	
	Management of Personnel Change (MOPC)				Maintenance Procedures	
	Work Organization and Scheduling HF				Pre-Startup Safety Review	
	Work Load					
	Allocation of Resources					
	Buddy System					
	Codes, Standards, and Policies**					

HF - Indicates that this subsystem is often included in a category called Human Factors.

\* There may be additional subsystems that are not included in this chart. Also, in the workplace many subsystems are interrelated. It may not always be clear that an issue belongs to one subsystem rather than another.

\*\* The Codes, Standards and Policies and Management of Change subsystems listed here are related to Design and Engineering. These subsystems may also be relevant to other systems; for example, Mitigation Devices. When these subsystems relate to systems other than Design and Engineering, they should be considered as part of those other systems, not Design and Engineering.

**Revised October 2006**



**Title: Workers Put at Risk to Benzene Exposure**

**Identifier: Volume 08, Issue 65**

**Date Issued: December 28, 2008**

**Lessons Learned Statement:**

The combined failure in training and procedures for repair work permits put workers at risk from a leaking benzene line. *Systems of Safety* are utilized to prevent this type of event.

Including the *Management of Change (MOC)* procedure, a subsystem of the **Training and Procedures *System of Safety***, to permit training will ensure that workers are knowledgeable when a work permit is initiated for repair work.

To further ensure that procedures are followed when performing repair work, the *MOC* procedure needs to be included in the Leak Repair Form. This is a well-defined fix using *Permits* in the subsystem of the **Training and Procedures *System of Safety***.

*Refresher Training* for workers on the proper procedures when initiating repair work permits will effectively support the line of defense in preventing this event.

**Discussion:**

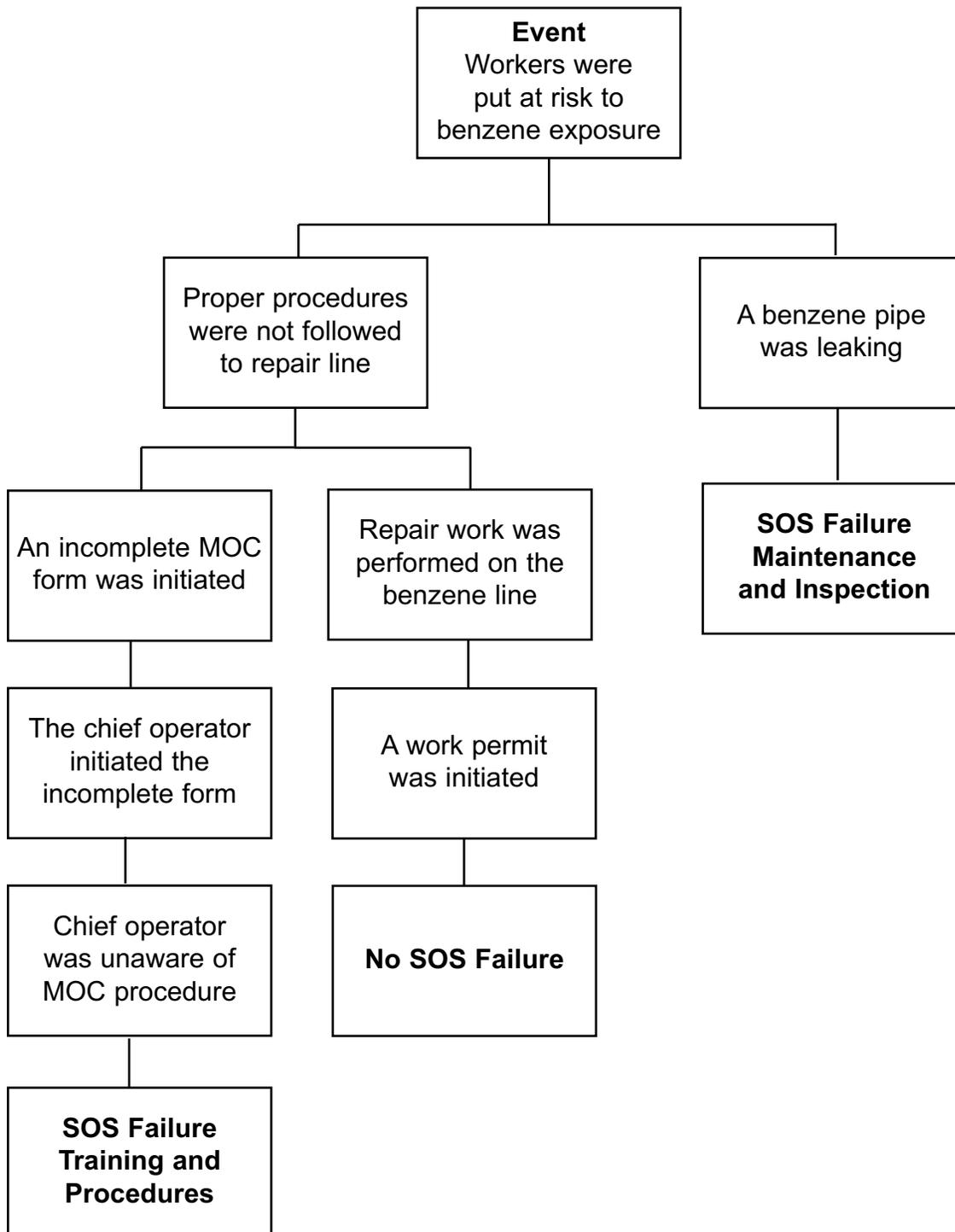
A clamp was installed on a leaking benzene pipeline without a completed Management of Change (MOC) form in place. An MOC form had been generated prior to the installation, but the maintenance engineer or plant area manager had not signed the form, which is the final step of an MOC procedure.

The investigation revealed that a Leak Repair Form was filled out with all the required signatures; however, an MOC is also required to initiate the repair of the leaking benzene line. The repair work was permitted by the chief operator because he was unaware that the permit should not have been issued until all signatures were in place on the MOC. The main concern of the operator was that the benzene readings in the area were putting operations personnel at risk of exposure.

Investigation also revealed that an MOC could not be initiated for the installation of the clamp until the benzene line was inspected. The inspectors were not fresh air-qualified and therefore could not conduct the inspection.

## Analysis

**The Logic Tree** is a pictorial representation of a logical process that maps an incident from its occurrence, “the event,” to facts of the incident and the incident’s root causes.



**Recommended Actions**

1. Include MOC procedure to permit training.
2. Include MOC requirement to Leak Repair Form.
3. Give refresher training on permits for MOC required work.

### Education Exercise

Working in your groups and using the Lessons Learned Statement, Discussion, Analysis and Recommended Actions, answer the two questions below. Your facilitator will give each group an opportunity to share answers with the large group.

1. Give examples of ways to apply the Lessons Learned Statement at your workplace.

---

---

---

---

---

---

---

2. Of the examples you generated from Question 1, which will you pursue in your workplace? (**Note:** When we say something you may pursue, we mean a joint labor-management activity or a union activity rather than an activity carried out by you as an individual.)

## Trainer’s Lessons Learned Success Inventory

Following a Lessons Learned (LL) session, **the trainer who led the LL** should complete this form. This information will: 1) Help you reflect on the successes and challenges of the session; 2) Help USW with new curriculum development; and 3) Help USW as a whole better understand how the LL Program is supporting their workers.

By reviewing LL from different sites or from other areas of their workplaces, workers are able to analyze the information and apply these lessons to their own workplaces in order to make their workplaces healthier and safer.

1. Site name (if there are participants from more than one site, please list all).

---

2. Date of LL training \_\_\_\_\_

3. LL number used in today’s Training \_\_\_\_\_

4. Your name \_\_\_\_\_

5. **Summary of Education Question 1:** Please summarize participants’ examples of ways to apply this LL Statement to their workplace.

**Please continue on reverse side.**

- 6. Summary of Education Question 2:** Please summarize actions or recommendations participants discussed pursuing at their workplace(s).

**Thank you for completing this form.**

# EVALUATION

## Lessons Learned: Workers Put at Risk to Benzene Exposure

Please answer the two questions below:

1. How important is this lessons learned to you and your workplace? (Circle one.) Rate on a scale of 1 to 5, with 5 being the most important.

1	2	3	4	5
---	---	---	---	---

2. What suggestions would you make to improve this Lessons Learned?

---

---

---

---

---

---

---

---

**End of Training Trainer’s Instructions**

Please complete the information below.

Trainer’s Name \_\_\_\_\_  
 (Please Print)

Date of training: \_\_\_\_\_

No. of Participants: Total \_\_\_\_\_ Hourly \_\_\_\_\_ Management \_\_\_\_\_

Location of Training: \_\_\_\_\_

USW Local # \_\_\_\_\_

Send:

1. This page;
2. The Education Exercise (page 8);
3. The Trainer’s LL Success Inventory form (pages 9 and 10);
4. The evaluation for each participant (page 11); and
5. The Sign-in sheet (page 13) to:

<p><b>If you are a TOP Site                  (excluding DOE TOP Sites)</b></p>	<p><b>Send to:                  Steve Cable                  2915 Gradient Drive                  St. Louis, MO 63125</b></p>
<p><b>All other sites                  (including DOE TOP Sites)</b></p>	<p><b>Send to:                  Doug Stephens                  United Steelworkers                  3340 Perimeter Hill Drive                  Nashville, TN 37211</b></p>

Thank you for facilitating the sharing of this  
 Lesson Learned with your coworkers.



