

Responsible Care 2018 results shared, new goals set



Dakota Gas manages its safety, health, security, and environmental responsibilities by following the Responsible Care Management System® (RCMS) process. Responsible Care uses a philosophy of plan, do, check, and act, whereby activities are planned, carried out, and then evaluated for their effectiveness.

Following Responsible Care guidelines is voluntary and not required by government regulations, although the system demands a commitment to staying in compliance with government rules.

Responsible Care companies must prove they are living up to their commitments by passing a third-party audit of their management system every three years. Internal audits are also conducted between recertification audits and will continue to be performed over the course of the next certification cycle.

Each year, Dakota Gas lists goals for the new year and reviews goals set from the past year to recognize and highlight the progress made over the past year.

The information covers the core areas for a Responsible Care company – environmental, health and safety, product stewardship, sustainability, and security. Goals are set in these core areas each year in an effort to drive improvement.

Plant Manager Dale Johnson will be reviewing the 2018 goals and achievements made, as well as presenting the 2019 goals during the first quarter safety meeting set to begin this week. Meetings are scheduled in the Pioneer Theater Feb. 8, 14, 15, and 20 for administrative employees.

The following is a brief summary of what Johnson will cover and a recap of the 2018 goals:

Compliance Safety and Industrial Hygiene 2018 goals and performance to goals

1. Work towards resolving potential Process Safety Management non-conformance observations from September 2017.
 - a. Multi-year corrective action plans were developed for all potential non-conformance observations and are currently being implemented.
 - b. Seven of 21 potential non-conformance observations were completed in 2018.
2. Mitigate chemical exposure potential by assessing hazardous sample points.
 - a. A list of 1,250 lab sample points was narrowed down to 100 sample points.
 - b. Operations was involved in further narrowing the list from 100 to about 20.
3. Reduce radiation exposure potential by the lowest possible number of nuclear gauges.
 - a. Several gauges were removed. Only one remains.
4. Support commissioning of the urea project.

Environmental 2018 goals and performance to goals

- Fixed SP-109 active landfill berms to prevent leachate overflows.
- Identified all waste storage areas and verified compliance.
- Developed procedures and templates for spill reporting to satisfy new standards.
- Maintained greater than 95 percent reliability for groundwater recovery well.
- Reclaimed urea site parking lot/construction yard by removing all debris and re-seeding it.
- Developed and implemented new NSR training procedures and evaluation criteria.
- Developed urea boiler Predictive Emissions Monitoring System (PEMS) for NOx.

Emergency Management and Security 2018 goals and performance to goals

1. Conduct four vehicle site entry audits.
 - a. Four site vehicle audits were conducted in 2018.
2. Conduct four emergency response drills (one for each shift).
 - a. Four emergency response drills were conducted in 2018.

The following goals were set for 2019 Compliance, Safety, and Industrial Hygiene goals

1. Continue to work on potential non-conformance observations from the Process Safety Management Compliance Audit from September 2017.
2. Evaluate and implement new RMP Amendments.
3. Increase the number of CI Inspections to reach 2019 goal of 250.
4. Complete noise monitoring for 6200 & 4300 units.
5. Evaluate portable monitors for applicability plant wide.
6. EXP 6.2 software roll-out at Dakota Gas.
7. Survey potential exposure from process sample points by identifying potentially hazardous sample points, surveying current methods used to acquire samples, and prioritizing exposure risk.
 - Modify four sample points to make them inherently safer in 2019.
8. Fully implement PHMSA recommendations.

Environmental goals

1. Reclamation of SP-100 and SP-101 closed landfills:
 - a. Reduce leachate level in SP-100.
 - b. Run plant air to resume operation of leachate recovery pumps from closed areas (SP-101 and north half of SP-109 active landfill).
2. SP-109 active landfill improvements:
 - a. Dredge southeast corner leachate collection pond to enhance leachate handling.
3. Groundwater remediation:
 - a. 95 percent reliability for groundwater recovery well.
4. Implement North Dakota Pollution Discharge Elimination System (NDPDES) changes.
 - a. Identify strategies to reduce storm water contaminants.
5. Air control and monitoring system optimization:
 - a. Develop and implement mercury control technology.

Emergency Management and Security goals

1. Conduct four vehicle site entry audits.
2. Conduct four emergency response drills (one for each shift).