UC 149-2

PLAINTIFF'S EXHIBIT
UC-877

UNION CARBIDE

INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION • P. O. BOX 1049, GRAND JUNCTION, COLORADO 81501

To (Name) Mr. F. H. Larrison
Company Mining and Metals
Location King City, California

Date May 28, 1974
Originating Dept. Safety
Answering letter date

Copy to Messrs. J. F. Emerson
R. J. Klotzbach
W. C. Thurber

Subject Safety Inspection, King City Operations May 13-14, 1974

Dear Larry:

Although you were absent during my visit I reviewed a number of the program items from past consideration and also looked over the mill and mine. The following are my comments.

Previously considered subjects

1. The personal contact program continues much as it was as far as I could determine. The supervisors do conduct periodic instructional or correctional type contacts. I failed to see where this has been augmented in the way which we were hoping all locations would this year, that is a special emphasis contact aimed at trying to reach the people with probing contacts that will bring to light any attitudes or hang-ups, etc. Hopefully this type of emphasis can be achieved in the latter part of the year preferably without eliminating the normal contact pattern which should be perpetuated indefinitely.

2. Job observation program appears to have been receiving less emphasis in recent months. If it has been serving the purpose (and it has in other locations) it can be maintained only through special reminding and emphasis to supervision of the importance of the program. I personally hope it can be jacked up and made more effective in the near future.

3. Review and reissue of new safety rules is in progress with some revision being done. I have sent Bob Kronkhyte a few other sets of safety rules for possible aid in continuing the revision. The reissue and review of revised safety rules can be a most valuable safety device as it refreshes everyone's understanding and acceptance of the various rules and particularly those that have been changed or added since the last printing.

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4. Ground fault interrupter installation: I talked about this with Dick Marsten and Bob Kronkhyte considerably and understand that to complete installation of GFI's in all the circuits will be approximately $2000. There is no firm Divisional policy on this (as far as where and how to use them) at this time. However, I feel that the completion of circuit protection would be a very desirable safety factor in King City as well as elsewhere.

5. Job Safety Analyses: apparently no program of new activity is ongoing at this point and time. I would hope that by the time of our next safety audit significant progress can be made in the job safety analyses development project.

6. Dust control: I was pleased to note the better usage of respirators than during my last visit although one or two people did pass through the bagger-pelletizing area without putting them on. However, I was concerned about the fact that spillage was receiving little concern on the part of the hourly operators. The door to the bagger enclosure was open for three successive shifts and spillage continued to eject onto the floor and room area during this period. Perhaps the employees are putting great reliance on the respirators and feel that the other control factors such as minimizing spilllage and affecting prompt clean-up is of little necessity. Our extensive efforts to provide coveralls, showers, double change rooms, etc., can be offset by this type of attitude. Mr. Thurber's letter of May 20 regarding individual exposure records is noted along with the fact that I discussed this with Paul McDaniel who concurs that this is a desirable and practical approach. I will get a description of the procedure we use for input of this type of information on the computer for radon daughters and get it to you and also discuss this matter with the computer people here to initiate capability in doing this in the near future.

7. Noise: The H-30 was running and the M-30 hammer mill was down. We took a few noise samples and found that the H-30 was averaging about 100 dba with variance from 96 to 102 on the walkway surrounding it. This is approximately 3 decibels above the last readings on the M-30. This amounts to doubling the amount of noise. Engineering controls such as the vibrations absorbing mountings and the sound deadening material used on the M-30 might be worthwhile on the H-30 as well if it is to be used much.

8. Propane tank and gas line protection: Nothing has been done yet to protect these vital installations as was requested in the audit last fall.

9. Major hazard survey: This has not yet been undertaken although I believe you have the foremat and instructions available now.

New Items

1. We discussed the desirability of using a forklift written pre-use check form to assure the operators are reminded of the proper check procedure. This was in use at some time in the past but has been discontinued. I feel personally that it would be a desirable foremat to achieve responsibility and accountability of the operators to check the essential items each shift as they start use on a piece of equipment.

2. The forklifts and similar equipment need interrupter switches to prohibit activation from the ground. We looked at one or two that have the flip-up seats but the maintenance on these has deteriorated so that an interrupter switch was not functional at the moment.

3. The track-mobile light rotation was not working and the horn, although working, was not as loud as I have seen on some of the others. A louder horn might be desirable especially when pushing cars or having some distance between the operator and the switchman or signalman.

4. The roadway that the forklifts use between the pallet storage room and the railroad loading area is breaking up at the junction of the asphalt and concrete. We watched forklifts bounce badly when crossing this and I had thoughts of a possible overturn at this rough point. Dick tells me he is working toward a concrete runway all the way. In the interim I wonder if you could use a metal dock plate cross-over or increase the maintenance function to minimize the roughness of this particular point.

5. If we plan on continuing the Trojan loader for several more years I feel we should move in the direction of putting on roll-over protection system even though it is questionable now as to what the pre-1969 ROPS requirements will be. At least it would be desirable to get information regarding availability and cost.

6. Several of the vertical ladders such as the one that goes to the surge tank are not equipped with gates at the top of the ladderway where the horizontal walkway is reached. We should provide these with self-closing gates or bars so that no one can step into the ladderway inadvertently.

7. The slick floor problem still remains near the bottom of the stairway in the main mill area. More roofing material should be put down to provide an extension of the walkway through this slippery area.

8. Several people with long hair were observed in their work areas and apparently lacking adequate control of the hair. Bob tells me that light duty hairnets have been issued and perhaps were being used but I feel that if they were in use they are not really doing the job of confining the hair adequately. This problem exists in many locations but I am very concerned that we affect control of this to the extent that the individual finds a way to properly confine the hair so that it is impossible to get caught or entangled in any equipment he is using. Depending on the type of haircut it is possible to

tuck it up under the hard hat, tie it with a cloth, draw it into a ponytail, tucked inside of the shirt, or tie it in a bun or knot against the head so as to meet our Division Minimum Standard.

Mine Items

The general operation of the truck loading and haulage screening loading operations, etc., were excellent. I spent several hours at the mine and was quite impressed with the excellent work being done by Roger and his men. My only comments were as follows:

1. The ladder to one of the gasoline tanks needs hand holds and a railing and on the other tank the railing should be reinforced.

2. Our hourly employees at the mine did not take first aid at the mill due to scheduling difficulties. I feel it is most important for people who work in this remote area to get as much first aid as possible and would strongly recommend that special efforts be made to accomodate their difficult schedule in getting them to the first aid classes. Both expressed interest but the work and travel schedule back to Coalinga each day discouraged them from taking the training the last time around.

3. Roger and I discussed the training of contractor truck drivers who use our loader and apparently it is completely left up to the contractor. I feel that we have a responsibility in making sure that our loader is operated properly and that we should establish a requirement whereby one of our people goes through the fundamental loader techniques that we want used by drivers who will be operating the loader on evening or non-scheduled shifts.

I am sorry you were not able to be there during my visit. I attempted to call you and discuss these items but I will record them here and we can discuss them later. As always, I appreciated the cooperation of Bob, Dick, Roger, and the others whom I visited during my inspection.

Very truly yours,

E. A. Piersall

EAP/brs