PLAINTIFF'S EXHIBIT
tabbies
UC-1122

Jackson AF (Andrew)

To: Thomas RC (Bob); Mongrue DM (David); Miller MJ (Michael); Green SL(Stan)
Cc: Batiz LE (Luis); Balmert PD (Paul); Ketcham JC (Jan); Provenzano FS (Foley); Duvall MN (Mark); Burns RR (Richard); Wilcox LL (Lou); Hunter BA (Bruce)
Subject: OSHA Visit on 3/5/96

On 3-5-96 OSHA compliance officer (CO), Kim Scates requested entry. Ms. Scates is a member of OSHA's petrochemical unit. This is the unit which normally conducts the full scale Process Safety Management (PSM) inspections which has been known to last a period of time. Hopefully it won't get to that point but the potential is there. She provided 3 pages of allegations which ranged from UCC using "non-english speaking and reading contractors" to operators not being given enough time to train and learn multiple jobs, operators given inadequate to do there jobs, etc. In all, there are 21 allegations. Initially, the discussion of the operator issues were centered around ESFR but later branched out to SVR and Hydrocarbons. As a result, OSHA have requested the following information:

1. Plant Layout
2. **All** incident reports for the last 3 years at SVR, Utilities and Hydrocarbons. She had initially requested all incident reports (last 3 years) for the entire plant.
3. Name of employees assigned to ESFR (Utilities) unit.
4. Name of test administrators and trainers for ESFR unit.

I need to know how long will it take to get this done. Let me know so I can give the CO an idea of when to expect this package. Thanks for your help! Andrew

UCTC 14685

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