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PLAINTIFF'S EXHIBIT UC-1173

UNION CARBIDE CORPORATION
Chemicals and Plastics

Texas City, Texas

To: Mr. D. L. Engle

November 11, 1976

Copy To: Dr. D. H. Glenn
Mr. A. E. Helms
Mr. J. B. Leverton
Mr. W. P. Nickles
Mr. R. E. Peele - 511
Mr. F. S. Provenzano
Mr. R. J. Taylor

Subject: OSHA Inspection
Oxo-Syn Gas Control Room - Bldg. 138
November 4, 1976

Dear Mr. Engle:

At 10:00 a.m. November 4, 1976, three OSHA Industrial Hygienists, Messrs. Ted Huddle, Roy Piggee, and Sandy Irving, called to inspect following a complaint registered against the Oxo-Syn Gas Control Room in Bldg. 138.

Mrs. Peri Yalcinkaya escorted them to Mr. W. P. Nickles office where they were joined by R. J. Taylor and the writer.

The charge was "non air conditioned control room exposing employees to carbon monoxide and vinyl dust, primitive eating and cooking facilities, and roaches and ants".

Mr. Huddle, the spokesman, indicated that they wished to look at the area of note, possibly take pictures, and talk with employees. The discussion centered on past CO studies and the Plant long-term effort to air-condition control rooms. Since an inspector had answered a questionnaire only two months ago, no repeat was required.

Mr. Huddle commented that previous inspectors had indicated he would find an excellent Occupational Safety and Health Program.

The party met Sam Munn, Union Representative, and Andy Helms, Department Head at Bldg. 138.

The inspectors took air samples for CO at the operator's desk with Bendix Gastex low level detector tubes. Less than 25 ppm was indicated. Pictures were taken of the continuous CO monitor above the desk and the food preparation area behind the panel board. Settled dust was noted on equipment. However, no visible airborne

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dust was apparent. Interviews were held with J. H. Heckendorn, Chief Operator, Herb Helper, Operator, and Sam Munn. Messrs. J. C. Pollock and Eddie King also joined the group.

At the exit interview in the Manager's office, Mr. Huddle requested: (1) to see previous CO monitoring data, (2) a copy of toxicology data for vinylite dust as a nuisance type, and (3) a copy of plans and dates for air-conditioning Bldg. 138 control room. Mr. Nickles left open the option to decline the last.

Mr. Huddle stated that his findings would be reviewed by the Area Director. Further contact would be made as needed. An invitation was declined to have lunch in the cafeteria. On the way out Mr. Huddle requested that we mail copies of the three items. They departed at 12:30 p.m.

In retrospect, Mr. Nickles and the writer expressed reticence to mail data not expressly required by regulation or for corrective action of a citation. We wished to cooperate. Yet, we felt the requests were out of school.

Mr. John Whittlesey, NYO attorney, was contacted. He advised not to mail anything.

One specter looms overhead --- that the Texas City Plant would be required to provide lunch relief to operators as does Bound Brook. More probably, the worst will be a non-serious citation for housekeeping.

On November 8, Mr. Claren Kotrla phoned from the Houston Area Office requesting information on methods of cleaning vinyl resin autoclaves. He indicated the request originated in Washington, D. C., and that he felt the best answer could be obtained here. Mr. Nick Wheeler was down the hall and conversed with Mr. Kotrla on the subject.

Your comments are welcome.

Yours very truly,

D. E. Deese
Industrial Hygiene Director

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