To: Mr. J. B. Leverton
Mr. R. J. Taylor

cc: Mr. D. L. Engle
Mr. W. P. Nickles
Mr. F. S. Provenzano

FSP - fyc

RECEIVED
OCT 4 1979

UOC

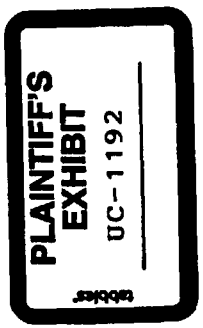
Date: October 3, 1979

UCTC 21166

From: Ron Ritchie

Re: OSHA Jobsite Information Survey

Re the attached correspondence concerning OSHA Jobsite Information Surveys. I don't know why this came down through E.R. channels--would have expected it from the SHARE organization. In any case, would you please pass it on to those with a need to know.



Union Carbide trial exhibit UC-1192: Ron Ritchie to J. B. Leverton and R. J. Taylor Forwarding OSHA Jobsite Infor...
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UNION CARBIDE

INTERNAL CORRESPONDENCE

RECEIVED
OCT 3 1979
R. RITCHIE

CHEMICALS AND PLASTICS

270 PARK AVENUE, NEW YORK, N.Y. 10017

To (Name)
Division
Location
Mail Stop

(See Attached Distribution List)

Date: October 1, 1979

Originating Dept: Employee Relations

Extension Number: 21

Mail Station and Location:

Subject: Health, Safety and Environmental Affairs

Please read and note the attached letter from John Whittlesey regarding Jobsite Information and Survey.

If you are asked to complete such a survey, please contact your appropriate Director.

R. V. Welty

RVW/cm
Attachment

UCTC 21167

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UNION CARBIDE CORPORATION
270 PARK AVENUE, NEW YORK, N.Y. 10017
LAW DEPARTMENT

RECEIVED
SEP 24 1979
R. G. MITCHELL

September 21, 1979

Mr. J. B. Browning
Health, Safety and
Environmental Affairs Department
22nd Floor

Re: OSHA
Jobsite Information Survey

Dear Mr. Browning:

I have received a copy of a proposed "Jobsite Information Survey" handed out by an Occupational Safety and Health Administration Compliance Officer after an inspection in Region VI, which covers, apparently, Texas and other southwest areas, which the Compliance Officer sought to have answered by the employer to be inspected.

We have no knowledge here of any effort made by an Occupational Safety and Health Administration inspector to require answers or a response to such a questionnaire, at this point. If one is furnished, it would be my advice that there is no legal requirement or responsibility on any of our representatives to answer such a survey or to furnish the information requested. Indeed, a number of the questions asked appear to go well beyond the authority of the Occupational Safety and Health Act in enforcing their safety and health regulations.

Accordingly, it is my recommendation that if any of our plants are asked to complete such a survey by an Occupational Safety and Health Administration inspector that they decline to do so and let the inspector proceed on the normal routine of his visit.

I attach a copy of the questionnaire. UCTC 21168

Very truly yours,

John W. Whittlesey

Attachment
JWW:me

cc: Messrs. T. W. Carmody and R. E. Mitchell

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RES

TO: ZEB BELL
FROM: J.C. DELGADO
CORPUS CHRISTI

JOBSITE INFORMATION SURVEY 2 PAGES

The following information is requested to assist in evaluating the safety and health program at your plant. Each category listed below should be answered completely and concisely on a separate page. Where the information desired does not relate to the plant process, please mark NA. The data gained from this survey will assist OSHA in completing an inspection report.

I. PLANT OPERATIONS

(A) Process Flow Diagram. Provide a general flow diagram which shows the important steps of the process. In larger plants, this usually consists of an "overview" plot and a more detailed illustration of the specific operation in question. All major equipment and plant areas should be identified.

(B) Number of Employees. An approximation of the total number of employees for all workshifts should be listed for the plant itself, as well as each major subdivision or unit.

(C) Chemical Inventory. Provide a summary of chemical raw materials, intermediates and final products for major plant processes. For large plants, this information applies to individual units only. Material Safety Data Sheets should be supplied for each chemical when they are available.

II. MONITORING PROGRAM

If the plant has an air sampling program or spot samples have been taken at the plant, the following information should be provided:

(A) Collection equipment used, and calibration record, if any;
(B) Sampling and analytical methods employed;
(C) Frequency of sampling, if performed regularly;
(D) Specified locations of sampling in the plant, if used;
(E) Names of persons who have performed sampling, including names of outside consultants; and
(F) Date of most recent sampling run. Please provide:
  (1) Time of sampling, with respect to work cycle;
  (2) Duration of individual sampling runs;
  (3) Specific sampling locations, with respect to process and work stations; and
  (4) The sampling results;
(G) Additional monitoring: noise, radiation, oxygen deficient atmospheres, etc

III. MEDICAL PROGRAM

(A) What types of medical examinations (such as preplacement, annual, or special tests for mercury exposure) or specific biological tests (such as urine mercury or blood phenol analysis) are provided and by whom, in-house or contract physician? Is audiometric testing performed? How often-preliminary, periodic, post-employment? If there is a hearing loss equal to or greater than 20dB, is a referral made to an oto-laryngologist?

(B) What are the medical protocols or reasons for providing other physical examinations?

(C) Where are the physical examinations conducted?

IV. RECORDKEEPING PROGRAM

UCTC 21169

(A) What types of records are being maintained?
(B) When was the particular recordkeeping started?
(C) How and where are records kept (such as medical records with employee's personnel records, protective equipment records in the warehouse, training program record with the safety engineer, etc.)?

(D) Are health-related records reviewed and correlated with other available records (air monitoring, training, and maintenance records)?
(E) Attach one copy of OSHA Form 100 (Log) and 102(Summary) or OSHA Form 200 (Log & Summary) for the last calendar year.
(F) OSHA Poster - where posted?
(G) Are individual employee medical records available to OSHA?
(H) Written records on monthly inspection of emergency use respirators.

V. EMPLOYEE TRAINING AND INFORMATION PROGRAM
Including new employees)--Do all employees get a written safety manual? (Provide a copy.)

(A) Who informs the employees about the potential health hazards associated with chemical exposure; noise exposure?
(B) How often does employee training take place, specifically on health hazards?
(C) What written training materials are provided? Include a copy.
(D) Is the employee able to review his or her individual health-related records?
(E) Are emergency procedures taught and practiced in the plant? Include copies of procedures. Are evacuation procedures included? Do procedures include work in confined spaces?
(F) Is the function and use of protective equipment and engineering controls taught? Written instructions for the selection and use of respirators are required to be established, according to 29 CFR 1910.134(b)(1). Are emergency uses anticipated and planned for? Please attach a copy if available.
(G) Regulated areas?(yes/no) Are regulated areas clearly identified?

IV. PERSONAL HYGIENE PROGRAM

(A) What type of locker and lunch facilities are provided?
(B) What type of shower facilities are provided?
(C) What procedures are used for enforcing good personal hygiene practices (such as washing of hands prior to eating and smoking and showering and hair washing prior to leaving premises)?

VII. PERSONAL PROTECTIVE EQUIPMENT PROGRAM

(A) Is protective clothing, such as head covers, goggles, coveralls, gloves, boots and footwear provided? Are ear plugs and muffs provided?
(B) Are respiratory protective devices provided? If so, what type? (Manufacturer, Model #)
(C) What is the program for repair and maintenance of all respiratory protective devices? How often are respirators inspected and by whom?
(D) What are the policies and procedures for issuing personal protective equipment? Are respirators assigned for individual use?
(E) How is contaminated protective clothing or equipment cleaned, decontaminated and/or disposed?
(F) Is street clothing prohibited in any area in the plant?
(G) Are contaminated clothing containers identified? Are labels used?
(H) Is there any PPE that will be required to be used by OSHA during this inspection?

VIII. ENGINEERING CONTROLS AND RELATED PREVENTIVE MAINTENANCE PROGRAM

Provide for each system:
(A) Control system identification and type;
(B) Design capacity;
(C) Approximate date installed;
(D) Collection system;
(E) Preventive maintenance plan;
(F) System performance measurement program; and
(G) Construction and surface finish of floors, work surfaces, and drainage system.

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IX. HOUSEKEEPING PROGRAM

(A) What is the method used for floor cleaning and the frequency of it?
(B) What equipment is used in the housekeeping process, such as vacuum cleaners, mops, flooding, sweeping, etc.?
(C) Is refuse segregated into contaminated or non-contaminated refuse for disposal purposes and picked up regularly?
(D) Is there an in-plant disposal site of production wastes?
(E) Who cleans lunch rooms? How often are lunch

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UCTC 21171