PLAINTIFF'S EXHIBIT

UC-1804

O. S. H. A. INSPECTION - BROWNSVILLE PLANT

SEPTEMBER 18, 1974

Mr. Bert Lindquist, District Supervisor, and Mr. Ray Skinner, Industrial Hygienist, representing the U. S. Department of Labor, inspected sections of the Brownsville Plant. The officers were from the Corpus Christi, Texas office.

The inspection was triggered by the opinion that we manufactured or stored vinyl chloride based on our SIC number. After discovering that we did not manufacture or store vinyl chloride, one of the inspecting officers, Mr. Skinner, decided that he would perform an abbreviated inspection concentrating in the area of industrial hygiene. The following areas were inspected:

1. Plant Laboratory
2. Respiratory equipment specifications and inspection records.
3. Noise Surveys.
4. Asbestos Exposure Data.
5. Sandblasting equipment and respiratory equipment.
6. O. S. H. A. forms 100 - 101 - 102.
7. Bulletin Board for display of Department of Labor Notification to the Employee.

Inspection Discussion:

Laboratory Area

Checked storeroom and storage areas carefully for carcinogens and target health hazards. Talked to two laboratory analysts privately. Checked exposure of analyst washing glassware. Checked for flammable vapors while drying glassware with acetone in open sink.

The inspector was impressed with laboratory equipment, industrial hygiene equipment and general laboratory capability.

Medical Area

O. S. H. A. Forms 100, 101, 102 checked. Very impressed with low O. S. H. A. recordables. Asked about audiometer calibration and certification of plant nurse. Inspector mentioned the regulations to be proposed soon related to a hearing conservation program. The plant nurse informed him that she was to attend a meeting soon to set up a plant audiometric program. He said he had no legal basis for looking at our audio-

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metric data but felt we were far ahead of most companies.

Respiratory Equipment Records and Procedures

Respiratory equipment records and procedures were checked and found to be in order.

The sandblasting area was checked for the following:

a. Sandblasting hood certification
b. Air Compressor.

We could find no Bureau of Mines certification stickers on the blasting hoods. He seemed concerned about this and felt that our permanent records should reflect this certificate number. (See general comments section).

The inspector checked the air compressor for high temperature cut-off capabilities.

We were also asked if we had silica exposure data. These data had not been collected. The inspector indicated that the Contractor should be responsible for monitoring for silica.

We pointed out use of Maintenance RM-1 computer program for safety equipment checks.

Industrial Hygiene Records Review

Exposure data was reviewed in the following areas:

a. Organic vapors in the operating area and personnel exposures. Records were reviewed briefly. The discussion centered around methods more than data.

b. Asbestos exposure records were reviewed. Maintenance procedures for removing and disposing of asbestos were reviewed.

c. Audio dosimeter data was reviewed. He checked data and pointed out error of duPont dosimeter in various frequency ranges. Impressed with our efforts in regard to noise maps.

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Laboratory Hoods

We asked the inspector if a laboratory ventilation hood had to meet ANSI standards. He felt that from an industrial hygiene standpoint he would monitor personnel exposure and not be concerned about design. If exposure was below eight hour time weighted average he would have no concern.

General Comments

Mr. Lindquist asked if we had a Plant Safety Committee, Safety Meetings, policies and procedures. We explained our formal safety program for him. We also showed him a list of records which the plant maintains for O. S. H. A. purposes.

The cafeteria bulletin board was checked for the O. S. H. A. Employee Notification Form. The inspector noticed our Plant Safety Committee Meeting notes and the UCC Disabling Injury Frequency Rate through August, 1974 which were also on the bulletin board.

Mr. Lindquist telephoned Friday, September 20th and thanked us for our cooperation. He had checked with the manufacturers of our sandblast hoods to determine if ours were Bureau of Mines approved. The hoods were approved and he provided the number for our plant records.

Documents Furnished Inspectors

1. "Union Carbide in Texas" Bulletin.
2. "SHARE UPDATE" No. 3, August 1974.
3. Receiving report for valve assembly from Fairmont, W. Va.
4. O. S. H. A. checklist of fourteen carcinogens and target hazards. (Attached)
5. O. S. H. A. questionnaire regarding number of personnel, products, location and management. (Attached)

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CSHO NO.	F/TR	OSHA-1 No.
AREA		REGION

JOB SITE QUESTIONAIRE
--PLEASE PRINT--

NAME OF COMPANY Union Carbide Corp.

TYPE OF BUSINESS [illegible]

DESCRIPTION OF WORK IN PROCESS [illegible]

JOB SITE ADDRESS P.O. Box [illegible] CITY [illegible]

STATE [illegible] ZIP [illegible] JOB SITE TELEPHONE NO. [illegible]

PERSON IN CHARGE OF JOB W. W. McManus TITLE Plant Manager

MAILING ADDRESS SUPERVISING OFFICE [illegible] P. O. BOX

CITY STATE ZIP

OFFICE PHONE NO. & AC NAME OF TOP SUPERVISOR & TITLE [illegible]

IF CORPORATION, GIVE NAME OF PRESIDENT AND HIS MAILING ADDRESS William S. Sneath
270 Park Ave. New York New York 10017

IF PARTNERSHIP, GIVE THEIR NAME AND THEIR MAILING ADDRESS

IF SOLE OWNER, GIVE HIS NAME AND HOME MAILING ADDRESS

IF ASSOCIATION OR OTHER LEGAL ENTITY, GIVE NAME AND MAILING ADDRESS

NUMBER OF YOUR EMPLOYEES AT THIS SITE: MALE 196 FEMALE 19

LARGEST SHIFT: MALE [illegible] FEMALE 19 TOTAL EMPLOYED AT ALL LOCATIONS 132,674

DO YOU HAVE A FEDERAL GOVERNMENT CONTRACT: YES ___ NO X, CONTRACT NO. ___ AMOUNT ___

ARE YOU UNION: YES ___ NO X IF SO, NAME ___ LOCAL NO. ___

BRE 0006

Employer Name Union Carbide

County Calhoun

SIC #

JOB SITE CHECKLIST
ON CARCINOGENS
AND TARGET HEALTH HAZARDS

CSHO No.	OSHA-1 No.
6090 Area	06 Region

Do you have use or store any of the following: (This information should be supplied by chemist, industrial hygienist, purchasing agent or other competent person).

	Yes	No
1. Poly vinyl chloride, vinyl chloride or vinyl chloride resins		X
2. 4 - Nitrobi phenyl		X
3. Alpha-naphthylamine		X
4. 4, 4' - Methylene bis(2-chloro aniline)		X
5. Methyl chloromethylether		X
6. 3,3' DICHLOROBENZIDINE (AND ITS SALTS)		X
7. bis-Chloro methyl ether		X
8. beta - Naphthylamine		X
9. Benzidine		X
10. 4 - Amino-dipheryl		X
11. ETHYLENEIMINE		X
12. beta-Propiolactone		X
13. 2 - Acetylaminofluorene		X
14. 4 - Dimethlaminoazobenzene		X
15. N - Nitrosodimethylamine		X
16. Target Health Hazards		
(a) Asbestos	X	
(b) Lead		X
(c) Silica	X	
(d) Cotton dust		X
(e) Carbon Monoxide	X	

THE ABOVE INFORMATION IS TRUE AND CORRECT
Employers Signature L. T. Windel Title Asst Fld. Mgr.

Date 9-15-71

Asbestos — Insulation of high temp. pipe — As it is we are using non-asbestos material.
Silica — Sandblasting

BRE 0007

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U. S. DEPARTMENT OF LABOR

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

Suite 1322, The 600 Building

600 Leopard Street

Corpus Christi, Texas 78

REQUEST FOR AN INDUSTRIAL HYGIENE INSPECTION

To: _____
(Name of Establishment)

_____
(Street)

_____
(City)

DATE OF REQUEST? _____ REFERRAL DATA CSHO SIGNATURE _____

1. What is produced? _____

_____

2. What raw material is used? _____

_____

_____

3. What materials are added in the process? _____

_____

_____

4. What operational procedures are used? _____

_____

_____

5. How many employees are exposed and for how long? _____

_____

ADDITIONAL INFORMATION:

BRE 0008

Plant Sinclair - Okla. *

Hygiene

BRE 0001

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INTERNAL CORRESPONDENCE

UNION CARBIDE CORPORATION

CHEMICALS AND PLASTICS

P. O. BOX 3370, BROWNSVILLE, TEXAS 78520

To (Name) Mr. W. W. McManus

Company

Location

Date September 23, 1974

Originating Dept.

Answering letter date

Subject O. S. H. A. Inspection, Brownsville Plant - September 18, 1974

Copy to ✓ Mr. B. F. Brown, 526
Mr. D. E. Deese, 515
Department Heads, 526
Mr. W. A. Gay, 312
Dr. D. H. Glenn, 515
Mr. R. C. Glock, 526
Mr. R. E. Graebert, 511
Mr. C. A. Keil, 526
Mr. R. E. Peele, 511
Mr. K. G. Townsend, 526

Attached is a summary of the O. S. H. A. inspection conducted by Department of Labor representatives on September 18, 1974. The inspection began at 9:00 A. M. and was completed by 1:15 P. M. No citations were issued or violations noted.

Very truly yours,

L. T. Windel

LTW:gr

Attachments

BRE 0002