ETHYL CORPORATION

INTER-OFFICE

To Mr. M. M. Koenecke — Address BR Plant

From H. O. Bourque — Address BR Plant

Subject OSHA "Inspection" — Date August 26, 1983

On Monday, August 22, about 1:30 p.m. two inspectors (Alan M. Johnson and Michael J. Kuykendall) from the local office of OSHA arrived on the plant to investigate a complaint. They presented a copy of a complaint from the union representing employees of Andover Division of Buffalo Molded Plastic Company in Andover, Ohio.

The complaint read in part "PVC Granules shipped by Ethyl Corporation, Baton Rouge, Louisiana, contained 5 ppm of vinyl chloride as determined by consultant independent lab for Allied Industrial workers exposed at the facility."

I informed the inspectors that this was a PVC Compound and we had not made the product here for a number of years and in fact, the plant had been dismantled.

He asked to meet the union president and discuss the complaint with him. I took the position that while it's true the union president needs to be drawn into the investigation if people in his union are involved, but in this case local people and local plant were not involved and I saw no reason to involve the union president.

In the meantime, we determined that the shipment was made from Tiptonville from a car of 7042 Natural 00 Lot 1062-T2. Plant test prior to shipment tested between 2.9 and 4.4 ppm. Obviously processing the resin would further reduce the monomer counted.

At my suggestion, the inspectors were put in touch with Henry Smith at the Ethyl Technical Center. They met him -- see his letter attached.

On the morning of Tuesday, August 23, Messrs. Johnson and Kuykendall came back to the plant. They reported that their "boss" was concerned about the employees here who were loading the resin into the hopper cars.

I suggested that this was one reason OSHA and EPA had so much friction and criticism from industry. It appeared to be an unnecessary investigation without provocation.

Having expressed the above, I told them we would proceed as though they had a legitimate complaint. I arranged for Warren Walls, president of the Steelworkers Union to come to my office. They inspected our Log OSHA No. 200 report for 1982 and were impressed by our 1.33 incident rate.

They wanted data tests taken in the loading area. Terry Maples provided the latest test (about 0.1 ppm) in January, 1983. He quoted the regulation under which he discontinued the regular testing.

They started discussion with the union president in my presence. I suggested that this was irregular and left the room.

While out of the room I contacted Herb Olson for information on residual monomer in resin now being shipped. Since the inspectors never came back to the subject, I never brought it up.

After the interview with Walls, they convened a "closing" conference. They stated that it looked like we had the situation in hand and we w uld not hear anything more about the incident.

Hugh O. Bourque

HOB:mdf

Attachment

cc: Mr. F. M. Beaird - ETC
Mr. D. E. Johnson - Tower
Mr. T. Maples - BRP
Mr. C. W. Montgomery - ETC
Mr. H. G. Olson - BRP
Mr. J. R. Greer - Tiptonville
Mr. W. M. Sorey - Tower
Mr. J. D. Spearman - BRP