

FROM E. B. PARKER

ROCKDALE WORKS

Mr. Bergeron
TO MANAGERS
DEPARTMENT HEADS

ROCKDALE WORKS

AGI file

1977 December 12

RE: OSHA INDUSTRIAL HYGIENE INSPECTION - ROCKDALE WORKS

Attached are copies of the citations received thus far as a result of the industrial hygiene inspection made by Mr. Carl Halgren, OSHA industrial hygienist, between November 3 and November 18.

We have fifteen working days in which to meet informally with OSHA and resolve any questions, or in which to contest any of the citations. The list was received on 1977-12-09, so our clock will run out between December 30 and January 4, depending on how the Christmas and New Years holidays are counted. I will confirm the exact date.

I intend to request an informal conference about December 20 to discuss such things as the nature of the violations on Citation 1 (serious or non-serious) and the abatement times where it is obvious that compliance cannot be achieved in the period specified.

We will be conferring locally with those whose input is necessary to develop abatement plans and schedules. Pittsburgh assistance will obviously be required in some areas.

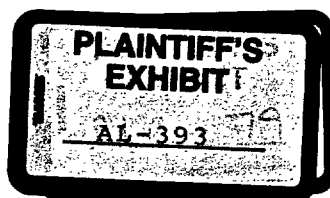
I will be coordinating our efforts locally. Please direct any comments concerned with abatement plans and schedules to me.

E. Brooks Parker
E. BROOKS PARKER

EBP:lr

Copy to:

J. R. Archibald - Pittsburgh
F. P. Bergeron - Rockdale
K. Jacqueline Bernat - Pittsburgh
T. B. Bonney - Pittsburgh
Dr. B. D. Dinman - Pittsburgh
R. C. McCormack - Pittsburgh
V. W. Rieke - Pittsburgh
S. I. Roth - Pittsburgh
R. W. Wrenn - Pittsburgh



ARD 015252

**U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION**

CITATION and NOTIFICATION OF PENALTY
Austin Area Office
Suite 310, American Bank Tower
221 West Sixth Street
Austin, TX 78701

RECEIVED DATE 12/8/77		OSHA NUMBER H7471 044	
REGION 06	AREA 0330	PAGE 1 of 2	

TYPE OF VIOLATION - CITATION NO.	
SERIOUS	1

TO: Aluminum Company of America
P. O. Box 472
Rockdale, Texas 76567

Attn: W. J. Drake, Plant Manager
cc: W. B. Renner, President

INSPECTION DATE:
11/03-21/77
INSPECTION SITE:
FM Road 1786
Rockdale, Texas

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section A Be Detached Before Posting

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
THE VIOLATIONS DESCRIBED IN THIS CITATION ARE ALLEGED TO HAVE OCCURRED ON OR ABOUT THE DAY THE INSPECTION WAS MADE UNLESS OTHERWISE INDICATED WITHIN THE DESCRIPTION GIVEN BELOW:			
1	29 CFR 1910.23(a)(3)(ii): Where operating conditions necessitate the feeding of material into any hatchway or chute opening, protection was not provided to prevent a person from falling through the opening: In the cathode mix room a 59 inch by 38 inch opening existed above the hot mix machine, through which methyl naphthalene, coke, and pitch were added	Immediate	\$240.00
2	29 CFR 1910.134(d)(2)(ii): Only a high-temperature alarm was used on oil lubricated compressors and the air from the compressor was not frequently tested for carbon monoxide to insure that it met the requirements of the specification for grade D breathing air as described in Compressed Gas Association Commodity Specification G-7.1-1966: The Ingersoll-Rand compressors, serial numbers JH5869, JH4706, JH4440, 4760, located in building No. 37G	1/3/78	\$240.00
3	29 CFR 1910.178(p)(1): Powered industrial trucks with defects or in any way unsafe had not been withdrawn from service until restored to safe operating conditions: Industrial truck #33-164 operated in the vicinity of furnace #12 was operated with an unapproved and broken overhead support brace	12/27/77	\$300.00
4	29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 p.s.i.: Plant air at 100 psig + 20 psig was used to clean pot #51 in Room 132 during pot patching operations	12/27/77	\$300.00

AREA DIRECTOR

Herbert M. Kurtz
HERBERT M. KURTZ

12/8/77

ON LAST PAGE

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

TOTAL PEN FOR THIS CITATION
Make check or Order Payable to "DOL OSH" Indicate OSHA on Remittance

**U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION**

CITATION and NOTIFICATION OF PENALTY

Austin Area Office
Suite 310, American Bank Tower
221 West Sixth Street
Austin, TX 78701

ISSUANCE DATE 12/8/77		OSHA NUMBER 1174711 044	
REGION 06	AREA 0330	PAGE 2 of 2	

TYPE OF VIOLATION		CITATION NO.
SERIOUS		1

to: Aluminum Company of America
P. O. Box 472
Rockdale, Texas 76567

Attn: W. J. Drake, Plant Manager
cc: W. B. Renner, President

INSPECTION DATE:

11/03-21/77

INSPECTION SITE:

**FM Road 1786
Rockdale, Texas**

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ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
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The conditions described in the alleged violations of this citation exposed employees to a serious hazard which could reasonably be expected to cause death or serious physical injury.

ARD 015254

AREA DIRECTOR

Herbert M. Kurtz
HERBERT M. KURTZ

12/8/77

\$1080.00

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Make check or M
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Indicate OSHA
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**U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION**

CITATION and NOTIFICATION OF PENALTY

Austin Area Office
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Austin, TX 78701

ISSUANCE DATE		OSHA NUMBER	
12/8/77		H7471 G44	
REGION	AREA	PAGE	
06	0330	1 of 3	

TYPE OF VIOLATION: CITATION NO.	
OTHER	2

INSPECTION DATE:
11/03-21/77
INSPECTION SITE:

FM Road 1786
Rockdale, Texas

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PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section Must Be Detached Before Posting

to: Aluminum Company of America
P. O. Box 472
Rockdale, TX 76567

Attn: W. J. Drake, Plant Manager
cc: W. B. Renner, President

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

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THE VIOLATIONS DESCRIBED IN THIS CITATION ARE ALLEGED TO HAVE OCCURRED ON OR ABOUT THE DAY THE INSPECTION WAS MADE UNLESS OTHERWISE INDICATED WITHIN THE DESCRIPTION GIVEN BELOW:			
1	29 CFR 1910.95(b)(1): Employees were subjected to sound levels exceeding those listed in Table G-16 of subpart G of 29 CFR part 1910 and feasible administrative or engineering controls were not utilized to reduce sound levels: An employee operating the stub press in the rodding room	12/8/77	\$165.00
	STEP 1: A written detailed plan of abatement leading to the complete abatement of this item shall be submitted to the area director. Such a plan shall: a) employ the use of qualified engineering personnel; b) include detailed engineering studies and their results; c) outline the ordering of equipment and materials and completion of the design phase; and d) outline dates for the anticipated implementation of the plan.	1/09/78	
	STEP 2: Abatement shall be completed by the implementation of feasible engineering controls and/or administrative controls and its effectiveness at achieving compliance verified. 90-day progress letters are requested during the abatement period.	12/8/77	
2A	29 CFR 1910.1000(c): Employees were exposed to nuisance dust in excess of the 8-hour time weighted average limits listed for nuisance dust in Table Z-3 of subpart Z of 29 CFR part 1910: A front-end loader operator in the vicinity of the bath crusher was over-exposed to the respirable fraction of nuisance dust	6/8/78	\$300.00
2B	29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to reduce employee exposures to nuisance dust: A front-end loader operator in the vicinity of the bath crusher was over-exposed to the respirable fraction of nuisance dust	6/8/78	

ARD 015255

AREA DIRECTOR 
HERBERT M. KURTZ

12/8/77

ON LAST PAGE

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TOTAL PENALTY FOR THIS CITATION
Make check or A.O. Order Payable "DOE OSHA" Indicate OSHA on Remittance

**U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION**

CITATION and NOTIFICATION OF PENALTY

Austin Area Office
Suite 310, American Bank Tower
221 West Sixth St.
Austin, TX 78701

ISSUANCE DATE 12/8/77	OSHA NUMBER H7471 043
REGION 06	AREA 0330
PAGE 2 of 3	

TYPE OF VIOLATION OTHER	CITATION NO. 2
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INSPECTION DATE:

11/03-21/77

INSPECTION SITE:

FM Road 1786

Rockdale, TX

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to: Aluminum Company of America
P. O. Box 472
Rockdale, TX 76567

Attn: W. J. Drake, Plant Manager
cc: W. B. Renner, President

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ITEM NUMBER STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED:	DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
STEP 1:	Effective respiratory protection shall be provided and used by employees as an interim protective measure.	12/27/77	
STEP 2:	A written detailed plan of abatement leading to the complete abatement of this item shall be submitted to the area director. Such a plan shall: a) employ the use of qualified engineering personnel; b) include detailed engineering studies and their results; c) outline the ordering of equipment and materials and completion of the design phase; and d) outline dates for the anticipated implementation of the plan.	1/09/78	
STEP 3:	Abatement shall be completed by implementation of feasible engineering and/or administrative controls and its effectiveness at achieving compliance verified. 90-day progress letters are requested during the abatement period.	6/8/78	
2C 29 CFR 1910.134(a)(2):	The employer did not establish and maintain a respiratory protection program which included the requirements outlined in paragraph (b) of this section: A front end-loader operator in the vicinity of the bath crusher was over-exposed to the respirable fraction of nuisance dust	12/27/77	
2D 29 CFR 1910.134(b)(1):	Written standard operating procedures governing the selection and use of respirators were not established: A front end loader operator transporting bath material in the vicinity of the bath crusher	12/27/77	
2E 29 CFR 1910.134(b)(3):	The users of respirators were not instructed and trained in the proper use of respirators and their limitations: Training on the uses and limitations of respirators was not given a front-end loader operator in the bath crushing area	12/27/77	

AREA DIRECTOR *Herbert M. Kurtz*
HERBERT M. KURTZ

12/8/77

ON LAST PAGE

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TOTAL PENALTY FOR THIS CITATION

Make check or Money Order Payable to "DOL OSHA" Indicate OSHA on Remittance

**U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION**

CITATION and NOTIFICATION OF PENALTY
Austin Area Office
Suite 310, American Bank Tower
221 West Sixth Street
Austin, Texas 78701

ISSUANCE DATE 12/8/77		OSHA NUMBER H7471-044	
REGION 06	AREA 0330	PAGE 3 of 3	

TYPE OF VIOLATION	
OTHER	2

INSPECTION DATE:
11/03-21/77
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to: Aluminum Company of America
P.O. Box 472
Rockdale, TX

Attn: W. J. Drake, Plant Mgr.
cc: W. B. Renner, President

PENALTIES
ARE DUE
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DAYS OF
RECEIPT
OF THIS
NOTIFICATION
UNLESS
CONTESTED
(See enclosed
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2F 29 CFR 1910.134(b)(11):	Approved or accepted respirators were not used when they were available: A front end loader operator working in the bath crusher area did not wear a respirator and was over exposed to the respirable fraction of nuisance dust	12/27/77	

AREA DIRECTOR

HERBERT M. KURTZ

12/8/77

\$465.00

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**TOTAL PENAL
FOR THIS
CITATION**

Make check or Money Order Payable to "DOL OSHA" Indicate OSHA on Remittance

This copy to W. G. Snider

FROM J. J. CONGLETON
ROCKDALE WORKS

TO MANAGERS
DEPARTMENT HEADS
SUPERINTENDENTS

1977-11-22

RE: OSHA CLOSING CONFERENCE, 1977-11-21
MONDAY 10:00 A.M. - 12 NOON ROCKDALE WORKS

Attached is a list of those people who attended and their respective function.

Attached is an item by item list of apparent safety and health hazards, associated area of the plant, and proposed abatement dates. Items marked with an asterik have been identified as hazards and a citation will be forthcoming. Those items not marked means that samples were taken and possible citations may result depending upon the findings from the analysis of those samples.

This list of items resulted from Mr. Carl Halgren, Industrial Hygienist and Mr. Walt Cunningham, Safety Engineer from OSHA conducting an inspection of the Rockdale Works facility on:

1977-11-03
1977-11-04
1977-11-08
1977-11-09
1977-11-10
1977-11-11
1977-11-17
1977-11-18

Mr. Halgren and Mr. Cunningham conducted themselves in a very professional and competent manner throughout the inspection.

Mr. Halgren's closing conference was also conducted equally professional. The Union and the Company maintained a businesslike approach throughout the inspection and closing conference.

It is now a matter of applying ourselves (jointly) to final resolution of these items.

A copy of the results of the sampling and the methods used in analyzing the samples will be requested in writing from OSHA.

A follow-up report will accompany the citation upon its receipt.

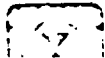
J. J. CONGLETON

JJC:mj 2/1

Attachments

For Distribution See Page Two

ARD 015258



ALFA

MANAGERS
DEPARTMENT HEADS
SUPERINTENDENTS
1977-11-22
Page Two

Copies to:

F. P. Bergeron, Rockdale
R. W. Wrenn, Pittsburgh
R. C. McCormack, "
T. B. Bonney, "
B. D. Dinman, "
J. R. Archibald, "
S. I. Roth, "

Attachment I

OSHA Closing Conference 1977-11-21
10:00 a.m. - Monday - Rockdale Works

<u>Name</u>	<u>Position</u>
1. J. J. Congleton	Manager of Safety
2. E. B. Parker	Environmental Superintendent
3. W. G. Henson	Union Safety Company Chairman
4. J. E. Crowder	Potlining Safety Chairman
5. Joe R. Hughes	Staff Representative USWA
6. Fred Mabry	Staff Representative USWA
7. Harry W. Brooks	Personnel Manager
8. E. J. Gaas	Potroom Safety Chairman
9. A. G. Clayton	Chief Chemist
10. J. L. Roddy	Electrode Superintendent
11. J. W. Havins	Production Manager
12. Evan R. Goltra, M.D.	Medical
13. W. D. Essary	Engineering Manager
14. C. L. Green	Environmental Manager
15. Farrel H. Sutton	Potroom Superintendent
16. H. P. Dick	Ingot Safety Chairman
17. Thomas Williams	Carbon Plant Chairman
18. Neal Ritchey	Potlining & Service Superintendent
19. Nelson Mueller	Safety & Health Administrator
20. Jack Drake	Works Manager

mj 2/1

ARD 015260

Attachment II

Item & Brief Description	Area of Plant	Action to be taken and Length of Abatement Period
1.* Chlorine respirators not available for emergency escape from area.	Properzi	Provide respirators - 15 days
2.* Opening to the top of mixer not guarded	Potlining - Building 127	Guarded and abated - 1977-11-10
3.* Carbon Monoxide alarm not installed for plant air compressors that are used sometimes for breathing air.	Total Plant	Install alarm - 30 days
4.* No attempt to reduce air flow from plant air system (100 psi +15 psi) - being used to blow off pots and superstructures.	Potrooms	Use of approved blow off pipes insuring no more than 30 psi air flow - 15 days.
5.* Pot Tenders eating their lunch in Potrooms (exposure to fluorides through ingestion)	Potrooms	Discontinue eating lunch or working in potrooms- 30 days.
6.* Not wearing approved asbestos respirator while handling asbestos and in addition question whether the provided 3M 8710 asbestos respirator is adequate protection.	Potlining (Cradle insulation)	Provide proper respirator. (15 days)

ARD 015261

Attachment II

Item & Brief Description	Area of Plant	Action to be taken and Length of Abatement Period
7.* Electric fork truck No. 33-164 had non-approved modification to overhead guard (from four post ot three post overhead guard).	Ingot	Install proper design overhead guard - 15 days.
8. Samples taken from Coal Tar Pitch Volatiles	Carbon Plant 1. Mixer 2. Press 3. Ring Furnace	A. Provide proper respirator (15 days) B. Develop Plan of Abatement (30 days) C. Final Abatement (1 year)
9. Samples for respirable dust taken of (primarily of vehicle operators)	Butt crushing mill Ore Unloading Bath Crushing Skim Room	A. Provide proper respirator (15 days) B. Develop Plan of Abatement (30 days). C. Final Abatement (6 months)
10. Samples Taken for Fluorides	Potrooms	A. Provide proper respirators (15 days). B. Develop Plan of Abatement (30 days) C. Final Abatement (1 year)

Attachment II

Item & Brief Description	Area of Plant	Action to be taken and Length of Abatement Period
11. Samples Taken for Asbestos	Potlining (Shim Pot Cradles)	A. Provide proper respirator (15 days) B. Develop Plan of Abatement (30 days) C. Final Abatement (1 year)
12. Violation of respirators standards	Total Plant	Follow the Alcoa Engineering Standard 18.1.1 - 15 days.
13. Excessive Noise	Rodding Room	A. Develop abatement Plan (30 days) B. Final Abatement - 1 year.
14. Excessive Noise	Ingot Furnace	A. Develop Abatement Plan (30 Days) B. Final Abatement (1 year).

mj 2/1

ARD 015263

FROM J. K. MC CLAIN

TO MR. H. W. COOPER
MR. R. G. BARLUND
MR. D. J. FISHER
MR. D. G. APFLEGATE

1977 September 27

cc: MR. G. B. SCOTT
→ MR. R. M. ROSE

RE: SAFETY

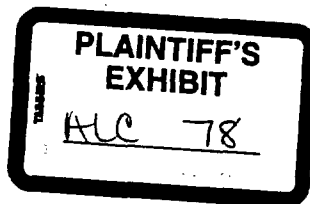
We have this year been very successful in improving our safety record as measured by serious and disabling injury frequency. This has required a great deal of attention to detail to avoid the numerous injuries caused primarily by individuals hurting themselves by careless work habits. Let me ask this question, how much have we done to prevent accidents which could result in fatalities? What percentage of our effort has been directed toward insuring that no one in our organization is killed on the job?

Now let me answer this question as I see it. Our overall safety program has improved all aspects of safety but we have not directly set out to minimize our chances of killing someone. This is what I want to do now. Please discuss this within your departments and identify the hazards inherent in our operation whereby inattention or equipment failure there is a distinct possibility of a fatal accident.

Then outline what should be done to further minimize the risk.

Jack
J. K. MC CLAIN

JKM/gac



ARCH 001142

ALCOA