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A COMPLIANCE INSPECTIONS

compiled in the interest of safer plant operation

Occupational Safety and Health Services of

the Aluminum Association

818 CONNECTICUT AVE. N.W., WASHINGTON, D.C. 20006
(202) 862-6135

VOL. 7 NO. 1

MAY, 1978

INSPECTION REPORT NO. 200

ALUMINUM REDUCTION PLANT

INSPECTION*

Date: September, 1977

No. Employees
At Location: 925

Inspection Time: 3 weeks

Reason for
Inspection: Employee
ComplaintNo. Alleged
Violations Cited: 4
(3 Citations)Total Amount of
Fines Assessed: \$880*State of Maryland
OSHA Compliance

**Maryland Standards

***Contested by company

CITATION ISSUED

Item	Standard or Regulation Allegedly Violated**	Description of Alleged Violation	Time Allowed To Correct
CITATION NO. 1—SERIOUS VIOLATION			
1***	1910.1000(a)(2)	Employees were exposed to coal tar pitch volatiles in excess of the eight-hour time-weighted average limit given for that material in Table Z-1, at the following locations: a) Crane over bake oven exposing employee to 0.54 mg/M ³ b) Anode storage and areas adjacent to bake ovens, exposing employee to 0.39 mg/M ³ c) Shaker Classifier, exposing employee to 0.80 mg/M ³	5 days
CITATION NO. 2—SERIOUS VIOLATION			
1	Art. 89, Sec.32(a)	Employer did not furnish to each of his employees employment and a place of employment which are safe and healthful as well as free from recognized hazards that are likely to cause death or serious physical harm to his employees at the following location: a) Cranes on pot lines, exposing employees to 13' and 13-½' drop off, while working from top beams of cranes that were 3' wide, by not being provided with safety belts attached to lifelines or guardrails on beams.	3 days
CITATION NO. 3—NONSERIOUS VIOLATIONS			
1	1910.1000(c)	Employees were exposed to nuisance dust in excess of the eight-hour time-weight average limit given for that material in Table Z-3, at the following locations: a) Rod shop welding booth b) Cranes on pot lines	15 days
2***	1910.1000(e)	To achieve compliance with paragraphs (a)(2) and (c) of Section 29CFR1910.1000, feasible administrative or engineering controls were not implemented at the following locations: a) Ladle shop, ladle cleaning b) Cranes on pot lines c) Rod shop, small steel welding booth d) Rod shop, shaker table e) Carbon plant, anode storage area f) Carbon plant, anode press g) Crane over bake oven h) Anode storage and bake oven area i) Carbon plant, shaker classifier area	30 days

PLAINTIFF'S
EXHIBIT
AL-1397

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INSPECTION REPORT NO. 201

ALUMINUM FOUNDRY

INSPECTION		CITATION ISSUED			
Date: March, 1978	Item	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Time Allowed To Correct	
No. Employees At Location: 360		1*	1910.178(1)	Operators were not trained in the safe operation of powered industrial trucks: In the foundry, the gas-operated and electric tow motors were frequently operated by employees who have had no training in the safe operation and use of the fork lift trucks.	2 weeks
Inspection Time: 2 days		2**	1910.101(b); Sec. 3.3.8, CGA Pamphlet P-1-1965	Two full chlorine gas tanks stored in the foundry for warm-up purposes were located along an aisle used extensively by fork lift trucks where they were subject to damage by passing tow motors.	Immediately
Reason for Inspection: Employee Complaint		3***	1910.133(a)(1)	Employees engaged in the pouring of molten aluminum in the foundry were exposed to the potential splashing of molten metal and were not wearing full face shields.	1 week
No. Alleged Violations Cited: 3					
Total Amount of Fines Assessed: \$720					
*Serious Violation **Repeated Violation ***Nonserious Violation					

INSPECTION REPORT NO. 202

ALUMINUM EXTRUSION PLANT

INSPECTION *		CITATION ISSUED		
Date: January, 1977				
No. Employees At Location: 420				
Inspection Time: ½ day				
Reason for Inspection: Routine				
No. Alleged Violations Cited: 1				
Total Amount of Fines Assessed: None				
*State of Michigan OSHA Compliance **Michigan Standards				

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ALUMINUM REDUCTION PLANT

INSPECTION*		CITATION ISSUED			
Date: March, 1978 No. Employees At Location: 750 Inspection Time: 8 hrs. Reason for Inspection: Employee Complaint No. Alleged Violations Cited: 8 (2 Citations) Total Amount of Fines Assessed: \$1,000 *State of Tennessee OSHA Compliance		Item	Standard Regulation Allegedly Violated	Description of Alleged Violation	Time Allowed To Correct
CITATION NO. 1— SERIOUS VIOLATION					
	1	1910.1001(b)(2)	Employees were exposed to an 8-hour time weighted average airborne concentration of asbestoes fibers in excess of 2 fibers longer than 5 micrometers, per cubic centimeter of air. Examples of such were the two Marinite Operators in the Marinite Room exposed to an 8-hour TWA concentration of asbestos fibers of 4.30 fibers/cc and 2.85 fibers/cc.		See step abatement schedule.
	1.1	1910.1001(b)(3)	Employees exposed to airborne concentrations of asbestos fibers in excess of the ceiling concentration of 10 fibers longer than 5 micro-meters per cubic centimeter of air. Examples were both of the Marinite Operators exposed to 18.87 fibers/cc and 10.48 fibers/cc.		See step abatement schedule.
	1.2	1910.1001(c)(1)(i)	Engineering controls were not used to reduce employee exposure to asbestos fibers to the exposure limits prescribed in paragraph (b) of this section. Examples were the two Marinite Operators exposed to asbestos fibers over the 8-hour TWA and the ceiling limits.		See step abatement schedule.
	1.3	1910.1001(d)(1)(i)	Respirators or shift rotation of employees were not used to achieve compliance with the prescribed exposure limits for asbestos during the time period necessary to install engineering controls or institute the work practices required by paragraph (c) of this section. Examples were the two Marinite Operators not wearing respirators when overexposed to asbestos fibers.		See step abatement schedule.
	1.4	1910.1001(d)(2)(iv)(a)	Employer did not establish a respirator program in accordance with American National Standard Practices for Respirator Protection, ANSI Z88.2-1969. As an example no respirator protection program existed for asbestos protection of the two Marinite Operators.		See step abatement schedule.
STEP ABATEMENT SCHEDULE					
			1- Effective respiratory protection shall be provided and used by employees as an interim protective measure.		2 weeks
			2- A written, detailed schedule of abatement, consistent with the complete abatement (final) date shall be submitted to the director. This schedule shall include target dates for such items as: Hiring of identified Engineering Consultants; Completion of engineering studies and preliminary surveys; discussions with TOSHA and decision to optimally feasible abatement program to be implemented; ordering of equipment and materials and completion of design phase; selection of contractor; submission of regular progress reports.		1 month

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ALUMINUM REDUCTION PLANT (Cont'd)

INSPECTION

Date: March, 1978

No. Employees
At Location: 750

Inspection Time: 8 hrs.

Reason for
Inspection: Employee
ComplaintNo. Alleged
Violations Cited: 8
(2 Citations)Total Amount of
Fines Assessed: \$1,000*State of Tennessee
OSHA Compliance

CITATION ISSUED

Item	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Time Allowed To Correct
		3- Feasible engineering controls and/or administrative controls, if no engineering controls are feasible, shall be determined.	2 months
		4- Abatement shall be completed at which time feasible engineering and/or administrative controls shall be implemented and employees shall not be subject to exposures exceeding asbestos limits.	3 months
	CITATION NO.2—NONSERIOUS VIOLATIONS		
1	1910.1001(d)(3)	Employer did not provide and require use of special clothing for any employee exposed to airborne concentrations of asbestos fibers which exceeded the prescribed ceiling level. Examples were the two Marinite Operators in the Marinite Room wearing the same work clothes to, during and from work.	2 weeks
2	1910.1001(d)(4)(i)	Change rooms were not provided for employees working regularly in fixed employment locations in which concentrations of airborne asbestos fibers exceeded the prescribed exposure limits. Examples were the two Marinite Operators not changing from their work clothes.	2 weeks
3	1910.1001(d)(4)(ii)	Two separate lockers or containers were not provided for each employee to prevent contamination of street clothes from work clothes.	2 weeks
4	1010.1001(f)(1)	Initial monitoring was not conducted in such a manner to determine whether every employee's exposure to airborne asbestos fibers is below the prescribed limits.	1 month
5	1910.1001(g)(1)(i)	Caution signs were not posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers.	2 weeks
6	1910.1001(g)(2)(i)	Caution labels were not affixed to all raw materials, mixtures, scrap, waste, debris, or other products containing asbestos fibers, or to their containers, which during any reasonably foreseeable use, handling, storage, disposal, processing or transportation could release airborne concentrations of asbestos fibers exceeding prescribed exposure limits. An example was the Marinite dust and other waste dumped loose into an open dumpster outside the Marinite Room, with no labels.	2 weeks
7	1910.1001(h)(1)	Places of employment were not maintained free of accumulations of asbestos fibers which, if dispersed, could result in an excessive concentration. As an example, some dust accumulation was noted on the stack of Marinite Boards, and under some machines in the Marinite Room.	2 weeks

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ALUMINUM FABRICATING PLANT

INSPECTION	CITATION ISSUED			
Date: March, 1977 No. Employees At Location: 270 Inspection Time: ½ day Reason for Inspection: Employee Complaint No. Alleged Violations Cited: 6 Total Amount of Fines Assessed: None	Item	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Time Allowed To Correct
	1	1910.24(e)	Fixed industrial stairs in assembly area not installed at an angle to the horizontal of between 30 and 50 degrees.	11 days
	2	1910.24(f)	Rise height not uniform throughout flight of stairs leading from floor to overhead platform in assembly areas.	11 days
	3	1910.24(h)	Standard railing around overhead platform and stair railing leading to platform did not have intermediate rail located halfway between top rail and floor.	11 days
	4	1910.309(a); NEC Article 400-4	Flexible cord used as a substitute for fixed wiring to connect rivet machines.	11 days
	5	1910.309(a); NEC Article 250-42(a)	Exposed noncurrent-carrying metal parts, which are likely to become energized under abnormal conditions, not grounded on riveting machines. The machines were fixed in position within eight feet vertically of ground or grounded metal objects and subject to contact by employees.	11 days
	6	1910.212(b)	Four riveting machines designed for a fixed location were not securely anchored to prevent walking or moving.	11 days

ALUMINUM FOIL PLANT

INSPECTION	CITATION ISSUED			
Date: January, 1978 No. Employees At Location: 55 Inspection Time: 2 hours Reason for Inspection: Employee Complaint No. Alleged Violations Cited: 1 Total Amount of Fines Assessed: None	Item	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Time Allowed To Correct
	1	1910.106(g)(8)	Conspicuous and legible signs prohibiting smoking were not posted within sight of customer service area: Gasoline tanks in yard North of plant.	3 days

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ALUMINUM REDUCTION PLANT

INSPECTION		CITATION ISSUED			
Date: February, 1978 No. Employees At Location: 2100 Inspection Time: 2 hours Reason for Inspection: Employee Complaint No. Alleged Violations Cited: 5 (3 Citations) Total Amount of Fines Assessed: \$3,060		Item	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Time Allowed To Correct
		CITATION NO. 1—SERIOUS VIOLATION			
		1*	Sec. 5(a)(1)	Deteriorating head walls expose employees to unsafe walking surfaces in furnace room which are likely to cause falls into baking oven furnace pits.	10 days
		CITATION NO. 2—REPEATED VIOLATIONS			
		1*	1910.22(a)(1)	Furnace rooms not kept clean and orderly, or in a sanitary condition: a) Work floor areas adjacent to center conveyor were not kept clean from excessive accumulation of coke, refractory and anode residues. b) Carbon anode blocks not kept in an orderly condition. c) Experimental manifold not stored in an orderly condition. d) Refractories and brick mason materials not stored in an orderly condition.	1 week
		2*	1910.176(a)	Aisleway for mechanical handling equipment between furnace rooms not kept clear of excessive coke spillage.	1 week
		3*	1910.23(a)(8)	Floor hole covers not in place to guard the vacuum line connection holes located on the floor in furnace room.	1 week
		CITATION NO. 3—NONSERIOUS VIOLATION			
		1*	1910.141(a)(4)(ii)	Wastes were not removed as often as necessary to maintain the place of employment in a sanitary condition: the bagged waste stored adjacent to lunchrooms located in the furnace room departments was not maintained appropriately for removal	1 week

*Contested by company

Member Company Participation

The Occupational Safety and Health Committee asks your cooperation in contributing inspection reports for publication in OSHA COMPLIANCE INSPECTIONS, particularly those involving aluminum production and fabrication operations. A broad exchange of inspection experience will be of great value in safety compliance programs. The value of our OSHA COMPLIANCE INSPECTIONS program will be in direct proportion to your participation.

The Committee advises it would be happy to respond to inquiries on OSHA matters in connection with aluminum production and fabrication operations.

Send your reports and inquiries to The Aluminum Association, 818 Connecticut Avenue, NW, Washington, D.C. 20006, attention of Mr. S.G. Epstein, Technical Director—Safety and Health.

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