

JAN 10 1972

DATE January 7, 1972

TO Mr. W. Farnulotis
LOCATION New York

cc Messrs. W. Page, Joliet
L. Farnuf, New York
J. Wilwohl, Erie Lake

FROM Mr. P.M. Herbst
LOCATION Erie Lake 6-02

SUBJECT: C.S.H.A. COMPLIANCE

In reply to your December 30, 1971, on the subject, I submit the following report by subpart:

A. The purpose and scope plus the meaning and implications of the O.S.H.A. Standards has been discussed with each involved member of the staff continuously since the receipt of the first information on the project. Each staff member has received a copy of the Federal Register, volume 36, No. 105, part 2, dated Saturday, May 29, 1971, with an explicit instruction that the subparts applying to their particular area of control be read, understood, and implemented immediately.

B. Does not apply to this location.

C. The Plant Engineer has completed the standard drawings for ladders, handrails, etc., so that future construction will comply with standards and revisions can be made to existing non-complying items.

We are in the process of line-marking all aisles and safety areas but have encountered a problem in that since the specifications call for white or black or a combination for aisle marking. Black won't work with asphalt, white discolors quickly. We will be painting on the paint.

All portable ladders have been inspected and have the proper non-slip feet plus a 6-foot length of tie-off rope firmly attached to the top rung.

An inventory has been taken of the dock boards, and we are in the process of obtaining prices for the replacement for all non-complying boards.

E. Egress has been reviewed with all supervisors, and a regular inspection is made to insure that no egresses are blocked, locked, or not available for emergency use. At this point we request that you clarify to us the actual make-up and color of the signs to be used indicating the various hazards, safety instructions, and exit instructions since there is some doubt in my mind as to whether or not we need the fancy, multi-colored enameled signs or good, clear, legible, economic plastic signs.

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GAF 11329

DATE January 7, 1972

TO Mr. W. Fassuliotis
LOCATION New York

FROM Mr. P.M. Herbst
LOCATION Erie Lake 6-02

cc Messrs. A. Page, Joliet
L. Faneuf, New York
J. Wilwohl, Erie Lake

SUBJECT: C.S.H.A. COMPLIANCE

We have begun the survey for installing the public building line exit signs and anticipate completion of the AFE request by March 1.

F. Does not apply.

G. We do not have the manpower or the talent at this location to make the occupational, level survey nor the dust survey.
noise

Mr. W. Page has requested assistance from you in this area and until such time as assistance is available, we are in jeopardy if such an inspection is made.

H. All cylinders, i.e., acetylene and oxygen, are inspected and are handled in accordance with the standards. Our L.P. gas system and the method for servicing tanks and trucks has been reviewed with all involved personnel and will be reviewed as a regular item at the monthly safety meeting.

I. This plant does have available eye, face, and head protection equipment for employees and our interest has always been in bump caps and safety glasses as part of the equipment. We are working with the Union committee at the present time informing them that the use of protection including respirators in areas where asbestos might be a problem until dust counts can be made, will be enforced as soon as the respirators are delivered which should be within the next 10 days.

J. As far as practical, our sanitation facilities are acceptable in the various areas of the plant, and we have instituted a covered receptacle system, but the demand for receptacle covers of this type has been so great the suppliers have not been able to keep up. They are on order and will be used as soon as they are available.

K. Two members of the Erie Lake Plant have qualified as Red Cross First Aid instructors, and they are currently in the process of selecting an adequate number of employees on each shift from each department and train them as First Aid people so that we will have complete coverage at all times. I might add at this point that in order to impress the individual employees on the importance that I personally place on this activity, I will also attend the classes and qualify as a Red Cross first aider.

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GAF 11330

DATE January 7, 1972

TO Mr. W. Fassulietis
LOCATION New York

FROM Mr. P.M. Herbst
LOCATION Erie Lake 6-02

cc Messrs. W. Page, Joliet
L. Faneuf, New York
J. Wilwohl, Erie Lake

SUBJECT C.S.H.A. COMPLIANCE

L. Fire Protection -- portable fire extinguishers have been checked, inspected, tested, and where necessary, additional units have been added, the locations have been painted and numbered. This particular unit is in good condition.

The sprinkler systems have been tested, and in order to comply with the Factory Mutual requirement, we will be requesting funds to inspect and clean all of the dry valve systems in the plant at an early date.

Additional dry chemical extinguishers have been added to insure adequate coverage in high-risk areas such as saturators and stills department.

The fire brigade consists of "old-timers" and has been extremely successful over the years in coping with the emergencies which might arise. It is evident that the overall awareness of the need for safe operation has been put across by the fact that four years ago the Fire Department visited this plant on a fire call once a week. In 1971 the Fire Department was called to the plant three times.

M. The compressed-air system in the plant is under constant inspection and is in good condition for the age of the system. The reducing-type valves for blow-off nozzles are here and will be installed.

N. Power and industrial trucks have been inspected for the safety guards and are in good condition to comply with the standards. On February 15 and 16 a complete operator training course for industrial truck drivers will be held again to complete the continuous educational processes of maintaining safe operation of this equipment.

O. Equipment drives, guards, etc., have been checked and an example of what is being done is covered in the attached copy of the letter by me to Mr. Faneuf, dated January 6, 1972.

P. The maintenance department has completed a study of this area, and we will complete the replacement or modification of existing equipment by February 1, 1972.

Q. All persons involved in this area have been instructed on the standards, but we have a slight problem of ventilation since our welding and burning occurs all over the place.

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GAF 11331

DATE January 7, 1972

TO Mr. W. Fassuliotis
LOCATION New York

cc Messrs. W. Page, Joliet
L. Faneuf, New York
J. Wilwohl, Erie Lake

FROM Mr. P.M. Herbst
LOCATION Erie Lake 6-02

SUBJECT O.S.H.A. COMPLIANCE

R. This subpart is being read for whatever general information it may contain applicable to our operation.

S. Our electrical group has been keeping up with the codes and making changes as time permits to see that they are in compliance with the codes, past and present.

On page 2 of your December 30, 1971, letter you referred to two locations' proposed fine of \$50 for not having posted the notice or notices informing employees of the protection and obligation provided for in the Act. I can report that notices were posted in the Erie Lake Plant on October 15, 1971, and are still posted for all to see.

One of the difficulties that I am experiencing at the present time is finding not only time to solve the non-standard items, but further get manhours of maintenance time to correct the non-standard items. A solution to this problem would assist greatly in completing the O.S.H.A. compliance attempt at this location.



PETER M. HERBST

PMH:cmp

Attachment

GAF 11332