EXHIBIT
CEL-213

A HIGHLIGHT OCCURRED ON THE SECOND DAY WALK-THROUGH. MR. HOLMES AND I WERE IN THE V.P.O. MOTH-BALLED AREA WHERE ARTHUR BROS. CONTRACTORS WERE REMOVING OLD PIPING. THE OLD INSULATION WAS BEING REMOVED AND PLACED IN PLASTIC BAGS FOR DISPOSAL. MR. HOLMES NOTED THIS OPERATION AND CALLED HIS OFFICE TO GET MR. SKINNER, THE INDUSTRIAL HYGIENIST TO INSPECT THIS OPERATION. UPON ARRIVAL, MR. SKINNER INFORMED ARTHUR BROS. THAT THIS WAS A NEW INSPECTION, AS ARTHUR BROS. HAD BEEN INSPECTED BY HIM EARLIER. THIS INSPECTION WAS LIMITED TO THE ASBESTOS INSULATION REMOVAL. THIS OPERATION WAS MONITORED BY MR. SKINNER, AND, AS A CONVENIENCE TO ARTHUR BROS., BY OUR LABORATORY. THE LAB SAMPLES AND OSHA SAMPLES PROVED WELL WITHIN COMPLIANCE.

CLOSING CONFERENCE

MR. HOLMES INDICATED THAT SEVERAL CITATIONS WOULD RESULT FROM THIS INSPECTION FOR WHICH VARIOUS PENALTIES COULD BE ASSESSED. THEY INVOLVED FAILURE TO HAVE A LOWER BLADE GUARD ON DE WALT SAW IN THE CARPENTER SHOP, BENT AND CRASHED MEMBERS ON THE BOOM ON THE INSLEY WAGON CRANE, POOR HOUSEKEEPING INSIDE THE CRANE, FAILURE TO HAVE A SPREADER ON HAND-FED CIRCULAR RIP SAW, AND NO SAFETY GUARD ON AN ABRASIVE WHEEL.. MR. HOLMES FURTHER STATED THAT DUE TO THE GOOD FAITH WE HAD DEMONSTRATED, AND A GOOD SAFETY RECORD THE SERIOUS VIOLATION ON THE SAW WHICH CARRIED A MINIMUM OF $1,000 FINE COULD BE REDUCED TO $600. THE CONDITION OF THE WAGON CRANE WAS A POTENTIAL SERIOUS VIOLATION, BUT HE WAS RECOMMENDING TO HIS SUPERVISOR THAT THIS BE REDUCED TO A MINOR VIOLATION.

INSPECTION RESULTS

THE FOLLOWING CITATIONS WERE ISSUED TEN DAYS AFTER THE CLOSING CONFERENCE:

1.	NO INSTRUCTIONS FOR MANLIFT USE AT EACH LANDING OR STENCILED ON BELT IN TMP FLAKER BLDG.	NO PENALTY
2.	THE UPPER LANDING TERMINAL RED WARNING LIGHT OUT ON TMP MANLIFT.	NO PENALTY
3.	R.R. BOX CAR BEING LOADED BY FORK-LIFT WAS NOT WHEEL CHOCKED.	NO PENALTY
4.*	A COMPLETE PERIODIC INSPECTION WAS NOT PERFORMED TO ENSURE THE CRANE STRUCTURE AND BOOM WERE FREE FROM DEFORMED, CRACKED OR CORRODED MEMBERS ON THE INSLEY CRANE	$ 30.00

* THE OSHA FEDERAL REGISTER CLEARLY OUTLINES MANY INSPECTION PROCEDURES. IN MANY CASES THE OSHA REGULATIONS REFER TO OTHER SETS OF REGULATIONS SUCH AS N.S.C. OR ANSI. WE DID NOT HAVE THIS ANSI STANDARD IN OUR POSSESSION. WE ARE RE-VIEWING OSHA STANDARDS TO MAKE SURE WE SECURE ALL OTHER APPLICABLE STANDARDS TO WHICH REFERENCE IS MADE.

5.	TOOLS, TRASH, OIL CANS AND OTHER ARTICLES LOOSELY STORED INSIDE OPERATIONS AREA OF THE INSLEY CRANE.	$ 80.00
6.	GUARD ON FAN WITH THE PERIPHERY OF THE BLADES LESS THAN SEVEN (7) FEET ABOVE THE FLOOR OR WORKING LEVEL IN THE OPENINGS GREATER THAN ONE-HALF INCH IN THE LIME HOUSE.	NO PENALTY
7.	THE HAND-FED CIRCULAR RIPSAW WAS NOT FURNISHED WITH A SPREADER. SAW LOCATED IN THE CARPENTER SHOP.	$ 30.00
8.	ABRASIVE WHEEL NOT PROVIDED WITH A SAFETY GUARD IN THE TOOL SHED AT NO. 1 UTILITIES.	$ 30.00
9.	THE SIDES OF THE LOWER EXPOSED PORTION OF THE BLADE ON THE RADIAL SAW IN THE CARPENTER SHOP WERE NOT GUARDED. RADIAL SAW ALSO WAS NOT INSTALLED IN SUCH A MANNER SO AS TO CAUSE THE CUTTING HEAD TO RETURN SMOOTHLY TO THE STARTING POSITION WHEN RELEASED BY THE OPERATOR.	$ 600.00
	TOTAL	770.00

POST INSPECTION ACTION

AFTER RECEIPT OF OUR FORMAL CITATIONS, THEY WERE POSTED AT THE VIOLATION SITE FOR THREE DAYS. DURING ONE OF THE THREE WORK DAYS, MR. HOLMES CAME AND VISITED EACH SITE TO SEE THAT THE VIOLATION HAD BEEN CORRECTED AND THAT THE CITATIONS WERE POSTED. ALL ITEMS IN THIS INSPECTION WERE CORRECTED.

MR. ROBERT HOLMES IS A MILD-MANNER PERSON. HE ACTED VERY COURTEOUSLY THROUGHOUT HIS VISIT AT OUR PLANT. WE FOUND THAT VERY COURTEOUS BEHAVIOR ON OUR PART KEPT HIS GOOD FAITH TOWARD US. HE WAS MUCH TOUGHER AND CONDUCTED MORE DETAILED INSPECTIONS WITH THE CONTRACTORS IN THE PLANT. IN THE CASE OF ARTHUR BROS., WHERE THEY USE THE SAME EQUIPMENT AS WE ON OCCASION, THEY WERE CITED FOR THE SAME VIOLATIONS. THIS WAS THE CASE ON THE UNGUARDED, RADIAL SAW AND THE WAGON CRANE THAT WAS ON LOAN TO ARTHUR BROS. AT THE TIME OF THEIR INSPECTION.

JOE STERNADEL

CC: MESSRS. J. H. FRICK
J. L. MERIAN
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