FILE NAME: Hercules Chemical (HERC)

DATE: 1978 Aug 29

DOC#: HERC021

DOCUMENT DESCRIPTION: Memo RE Plant Tour by Hercules Safety Dept Noting that an OSHA Inspector Would Have Shut down Operations, Imposed Large Fines & that the Co. Would be Vulnerable to Lawsuits

HAVEG INDUSTRIES, INC.
900 Greenbank Road
WILMINGTON, DELAWARE 19808

TO: H. Dudley Barton

DATE August 29, 1978

FROM: Edward C. Painter

M. O.

SUBJECT: Plant Tour by Mr. L. West from Hercules Safety Department

C. O.

PROJECT NO.

On August 24, 1978, Mr. L. West, from Hercules Safety Department, and I toured the Haveg-Marshallton plant.

This tour was of a low-key nature and more of an introductory type of inspection.

Generally, the impression Mr. West received was that Haveg has improved. He did notice that one of our forklift LP fuel bottles was barely attached to the unit causing a potentially dangerous condition. Also, that the stacked H600 foam stripping in Building 40 was a possible fuel source for generating a very hot fire. Hotter than our sprinkler system could handle. To eliminate this hazard, he recommends that we store the foam outside of the building if at all possible.

In the same locality there are asbestos paper rolls bare and without plastic-bag coverage as mandatory for asbestos items.

With the exception of asbestos treating, the drying room, and the solvent storage area, I appreciate the housekeeping effort put out by each department. Mr. West remarked that he certainly noticed a great improvement at Haveg. I hope that this area housekeeping habit keeps up and that the old ways of not caring are gone.

It is unfortunate that similar compliments certainly cannot be paid to the asbestos treating areas.

Mr. West remarked that if an OSHA inspector at this very moment showed up, Haveg would be instantly closed down and cited for willfully contaminating the environment with asbestos. OSHA would also impose, on Haveg, high penalties in fines and, in turn, this would make us wide open for multimillion dollars liable suits brought on by the personnel for being criminally exposed.

Such deplorable conditions in these localities is not of a first time happening. Mr. Good, my predecessor, as well as I, have constantly brought up the matter but somehow the seriousness of the nature does not seem to be acknowledged. A similar occurrence, although not related to housekeeping, was when Mr. A. Simpson, Delaware Air Division, visited us on August 23, 1978. His visiting time and the

(more)

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specific equipment he was to monitor was well announced and in plenty of foretime but the asbestos drier, one of the requisites, was not operating. Half an hour later when the drier was in operation and stabilized enough for monitoring the effectiveness of the complementing dust collector, the air blower on the roof was scattering asbestos fibers into the atmosphere, right before the eyes of our visitor. This could have been avoided had the drier been in operation and the blower outlet inspected that morning.

Another area of concern, in the safety-inspection tour, although this time the subject does not deal with asbestos, is the housekeeping in the solvent area alongside Building 37, Resin Plant. It was found to be disastrous with unmarked drums, ungrounded acetone, etc., dispensing drums, generally untidy, and unsupervised. The condition of that location was well-known to me and was brought to the attention of the supervisor. Actually, a letter went out on June 6, 1978 on the very subject of required bonding of flammable-liquid containers. Maintenance did rectify the condition in that area but supervision stopped there. No follow-up could have been made.

Such occurrences cannot be ignored, the wage-roll employees are generally the culprits because they are the user of the solvents in their operations but if no supervision is present and constant surveillance is not made, they stand blameless.

Not wanting to sound like a Cassandra, I must still say that I cannot over-emphasize the severity of these infractions and at my amazement of the observed lack of concern or an understanding of the gravity of such problems by the supervisor.

ECP/gf

