

PLANT LOCATION: CCTC

AGENCY: Occupational Safety and Health Administration - Corpus Christi Area Office

NAME AND TITLE OF AGENT(S): Ms. Marianne McGee - Industrial Hygienist

CONTACT INITIATED BY AGENCY:

COMPANY: X

COMPANY PERSONNEL INVOLVED: J. P. Lieck

DATE & HOUR CONTACTED: 9/28/89 3:00 p.m. and 9/29/89 9:00 a.m.

CONTACT BY: TELEPHONE XX PLANT VISIT AGENCY VISIT

OTHER

PURPOSE OF CONTACT: Determine status of OSHA investigation regarding chemical exposure incident on 9/8/89 and to set date and time for closing conference.

- COMMENTS: 1. Ms. McGee indicated that her office plans to issue citations to CCTC regarding alleged deficiencies in our written hazard communication program. The proposed citations appear to be based on requirements of the hazard communication standard (29 CFR 1910.1200), paragraph (e), subsections (1)(ii) and (2)(ii). Subsection (e)(1)(ii) deals with methods used to inform employees of the hazards of non-routine tasks and the hazards associated with chemicals in unlabeled pipes. Subsection (e)(2)(ii) deals with methods used to inform contract workers of "any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies."
2. Ms. McGee recognizes that we have working programs in place that address the requirements of the standard. The proposed citations are based on the allegation that the requirements are not documented in the CCTC written program. Ms McGee has been asked to review appendices (F) and (I) of our program. These appendices address methods for identification of materials in unlabeled pipes and training requirements for workers on site.
3. The requirements of the subsections referenced are also addressed in CCTC documents other than the written hazard communication program. These documents have been reviewed by Ms. McGee.
4. Ms. McGee indicated that the proposed citations are considered "other". "Other" is the least serious of the three levels of citations that OSHA issues.
5. A closing conference has been scheduled for 9:00 a.m. in the north conference room on Thursday, October 5, 1989.

SIGNED: *Paul Lieck*

009016