CELANESE CHEMICAL COMPANY
TECHNICAL CENTER
Corpus Christi, Texas

PLAINTIFF'S EXHIBIT CEL-706

To: Mr. L W. Hartman, CCCTC

From: R. L. Stannard RLS-96-73 June 21, 1973

I have gone through my assigned sections of the OSHA Standards and have completed my definition of existing problems. These are listed below with the portion of the text that we are not in compliance with. The cost and method of correction will have to be determined by your engineering group. 1910.134, paragraph (b) (2) and (e) (3) is one that I will take care of with a procedure. Either R. O. McAlister or myself will complete 1910.151.

1910.132	Personal Protective Equipment, General Requirements	OK
1910.133	Eye and Face Protection	OK
1910.134	Respiratory Equipment, paragraph (b) (2) and (e) (3): a written standard operating procedure governing the selection and the use of respirators needs to be established.	
	Paragraph (d) (2) (ii): this paragraph calls for a breathing air type compressor to be used for breathing air. Also in-line purifying sorbent beds and filters. Air receivers large enough to handle a compressor shutdown emergency and compressor failure alarms are also required.	
1910.135	Occupational Head Protection	OK
1910.136	Occupational Foot Protection	OK
1910.137	Electrical Protection Devices	OK
1910.144	Safety Color Code for Marking Physical Hazards	
	Paragraph (a) (1) (k): sprinkler piping shall be in accordance with ANSI Standard Scheme for the Identification of Piping Systems, A13.1-1956	
	Paragraph (a) (1) (k) (ii): safety cans or other portable containers of flammable liquids having a flashpoint	

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	at or below 80° F, table containers of flammable liquids (open cup tester) excluding shipping containers, shall be painted red with some additional clearly visible identification, either in the form of a yellow band around the can or the name of the contents conspicuously stenciled or painted on the can in yellow. Paragraph (a) (4): green shall be used as the basic color for designating "Safety" and the location of first aid equipment (other than firefighting equipment).	
1910.145	Specifications for Accident Prevention Signs and Tags	OK
1910.151	Medical and First Aid Paragraph (b): an approval of our first aid supplies by our Company physician is required.	
1910.156	Fire Protection Definitions	OK
1910.157	Portable Fire Extinguishers	OK
1910.158	Stand Pipe and Hose Systems	OK
1910.160	Fixed Dry Chemical Extinguishing Systems	NA
1910.161	Carbon Dioxide Extinguishing Systems	NA
1910.163	Local Fire Alarm Signaling Systems	OK
1910.176	Handling Material - General	OK
1910.177	Indoor General Storage	OK
1910.178	Powered Industrial Trucks	NA at this time
1910.179	Overhead and Gantry Cranes	OK
1910-180	Crawler Locomotive and Truck Cranes	NA
1910.181	Derricks	NA

R. L. Stannard

RLS:kb
cc: Mr. Paul E. Hime
Mr. R. O. McAlister
OSHA Committee Members