PLAINTIFF'S EXHIBIT
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CEL-211

GEN 55 REV. 1 (3-69)

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PJV

INTERNAL LETTERHEAD

TO (NAME AND LOCATION)		REFERENCE NO.
MR. GEORGE BEHLING		
FROM (NAME AND LOCATION)	REFERENCE NO.	DATE
JOE STERNADEL		MARCH 26, 1976

OSHA SAFETY INSPECTION - BISHOP

SUMMARY

FROM 1-20-76 TO 1-30-76 BISHOP WAS THE SUBJECT OF AN OSHA SAFETY INSPECTION BY MR. ROBERT HOLMES, A CORPUS CHRISTI OSHA SAFETY COMPLIANCE OFFICER. INCLUDED IN HIS INSPECTION WAS AN INITIAL INTERVIEW WITH G. BEHLING, J. CANTRELL AND THE WRITER, AND A REVIEW OF OSHA RECORDS, AFTER WHICH A COMPLETE PLANT INSPECTION FOLLOWED. ACTUAL TIME CONSUMED FOR THIS FULL PLANT INSPECTION WAS ABOUT TWO WORK DAYS. THIS IS PRIMARILY DUE TO NOT MONITORING EMPLOYEES, THE OSHA HYGIENIST HAVING MONITORED DURING THE PREVIOUS MONTH.

PLANT FAMILIARIZATION

MR. HOLMES BEGAN HIS INSPECTION IN LIKE MANNER THAT MR. RAY SKINNER, THE INDUSTRIAL HYGIENIST CONDUCTED HIS INSPECTION. HIS FIRST HALF-DAY WAS SPENT WITH JOE CANTRELL AND THE WRITER IN WHICH HE REVIEWED THE PLANT OSHA RECORDS. RECORDS HE SPECIFICALLY REVIEWED WERE THE OSHA LOGGABLE MEDICALS, CRANE AND HOISTS RECORDS, MANLIFTS, AND FIRE EQUIPMENT. A COMPLETE OSHA FILE IS KEPT UP TO DATE IN MR. CANTRELL'S OFFICE WHICH GREATLY FACILITATED THE INITIAL INTERVIEW. THIS ALLOWED US TO ESTABLISH GOOD RAPPORT WITH MR. HOLMES. HIS PRIMARY CONCERN IN THIS PHASE OF THE INSPECTION WAS THE OVERALL PROGRAM AND THE NATURE OF THE INJURIES WE'RE EXPERIENCING.

PLANT INSPECTION

THE NEXT DAY AND A HALF INVOLVED A WALK-THROUGH INSPECTION OF THE PLANT. THE WALK-THROUGH TIME WAS ABOUT EQUALLY DISTRIBUTED BETWEEN THE CHEMICAL AND PLASTICS FACILITIES. HE VISITED EACH UNIT INCLUDING ALL MAINTENANCE SHOPS. AT RANDOM HE WOULD SELECT AN EMPLOYEE AND TALK PRIVATELY WITH HIM FOR A FEW MINUTES. AS EACH VIOLATION WAS NOTED, MR. HOLMES TOOK A CLOSE-UP PICTURE OF THE VIOLATION. MR. HOLMES STATED THAT OSHA WILL GO OUT OF THEIR WAY TO EXCLUDE PROCESS EQUIPMENT, TRADE SECRETS, ETC. FROM THESE PHOTOS. COURTS HAVE REQUIRED PHOTOS IN CONTESTED SITUATIONS. NONE OF OUR VIOLATIONS OCCURRED IN A SENSITIVE PROCESS AREA, SO OSHA PHOTOS OF BISHOP DID NOT BECOME AN ISSUE.

MR. HOLMES, DURING THE WALK-THROUGH, WOULD NOTE AND CLOSELY OBSERVE THE CONTRACTORS WORKING IN THE PLANT. AFTER COMPLETING OUR INSPECTION, HE SUBSEQUENTLY INSPECTED EACH CONTRACTOR IN GREAT DETAIL.

I will review the guidelines of most importance to the company as they are issued and recommend an action plan.

J. M. Ramey

JMR/mg
Att.

cc: B. L. Pritchard
E. N. Wheeler
Jack Martin
Dave Damron
Homer Wilson
S. H. Warren
E. M. Dixon
Dave Dawson
Al Brown
H. J. Kolodner
Plant Technical Managers
Plant Laboratory Superintendents
U. Monahan