PLAINTIFF'S
EXHIBIT
CEL-809

Interoffice Memorandum

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LAW DEPARTMENT

TO (Name and Location)
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DATE
10/12/84

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REFERENCE NO
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SUBJECT: Bishop Product Safety Audit - August 21, 1984

A Company product safety audit was conducted at the Bishop Plant on August 21, 1984. The product lines involved were trimethylolpropane (TMP) and the Formcels®. An opening conference was held with plant management and the scope of the audit was discussed. The Corporate product safety audit questionnaire was used as a general guide.

The audit revealed several items worthy of mention and are listed as follows.

- All employees contacted in reviewing the TMP and Formcel® processes exhibited an improved understanding of the product safety programs when compared to the level of understanding noted in the previous audit.

- Laboratory personnel handle sample shipments in a particularly noteworthy fashion and possess a breadth of understanding regarding applicable regulations.

- The Traffic department appeared very knowledgeable of the DOT regulations, placarding and labeling.

Walk-around tours of the Formcel® and TMP units were conducted and the details of the process were discussed with the unit supervisors. The loading area for Formcel® was viewed as well as the TMP bagging and storage facility. Loading and handling procedures were discussed in both areas as well as proper labeling.

Several audit findings were noted and are listed below.

1. In the course of discussions with the Purchasing and Industrial Hygiene functions, it became apparent that the Purchased Chemical Review Program is in place and functioning. However, the Purchasing Department is using Celmis printouts that are over a year old. The Industrial Hygiene function should provide updated printouts at least quarterly.

2. In making sodium formate shipments (railcar) to Virginia Chemical (on the East coast) it was observed that appropriate labels were not

being used. The plant should supply a copy of the label currently in use to the Dallas Product Safety function and a new label will be developed.

A closing conference was conducted with the Plant Manager and appropriate members of his staff. The audit results and findings were reviewed and discussed for any needed clarification.

J.D. Wilson
Coordinator, Product Safety