

FROM J. J. COMPLETON /
ROCKDALE WORKS

TO MR. W. J. DRAKE
ROCKDALE WORKS

1979 August 15

RE: ADDITIONAL COMMENTS OFFERED DURING OSHA CLOSING CONFERENCE 79-8-7

These comments are provided as additional information and facts regarding the day's activities with the OSHA compliance officers on 79-8-7. Escorting the compliance officers in the Carbon Plant area to point out some additional concerns were Mr. Jack Bastow, Mechanical Maintenance Safety Representative for the area, and Mr. Thomas Williams, Plant Safety and Health Representative for the Electrode Department. These concerns were as follows:

1. Maintenance employees are exposed to fumes, perhaps coal tar pitch volatiles while working above the presses in the Carbon Plant while the presses are operating. The time might range from five minutes to two hours per day when maintenance employees are required to be above the presses. The question was why couldn't we operate the exhaust fans and the ceiling fans during these brief periods when maintenance is being performed. This will be reviewed with Bill Eckert and Lenton Speer for resolution.
2. Another area visited was the old 446 regenerator. This regenerator has many bad leaks and the dust was going straight through the baghouse - it was overloaded. Mechanical Maintenance supervisor Ross Cox and Mechanical Engineering have a short term plan for the next week or so to relieve some of the problems. The long term plan includes building three baghouses and replacing the electrostatic precipitator in the Carbon Plant.
3. The mixers on the mixer floor - The complaint was that on Wednesday, which is the maintenance down day, a production helper has to clean out the mixer by laying on a board and utilizing a chipping hammer to chip out the material. This material is hot and falls on the production helper and no ventilation is provided. In this same area, an employee the week before had burned his arm on an uninsulated steam pipe.
4. The compliance officers were also shown the ST-1 tank area in Building 54 and the top of Building 52 hummer screens where there was much leakage and a large collection of dust.

In summary, the compliance officers stated in a subsequent phone call on Wednesday 79-8-8 that their intentions were to write a letter outlining these areas of concern and that they did not



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intend to treat them as employee complaints because of the nature of the materials and the low exposure to employees. They suggested that the union and company work out these problems to the mutual satisfaction of both. The option was left to the union if they are not satisfied to send a formal complaint to OSHA.

Also to be outlined in the letter will be a request for the noise survey information of our restubbing area.

If you need any further points of information or clarification, please contact me. E. B. Parker will be picking up the communication with OSHA regarding the letter and followup on the areas of concern mentioned.

J. J. CONGLETON

JJC:cw

Copy - G. H. Lantz/E. B. Parker
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