

ETHYL CORPORATION

INTER-OFFICE

PLAINTIFF'S
EXHIBIT

ETCO-290

To	Mr. H. O. Bourque Mr. J. E. Gonce Mr. J. C. Klock	ADDRESS
FROM	S. A. D'Armond	ADDRESS
SUBJECT		DATE 8/16/73

Listed below are certain OSHA training and record keeping requirements.

(1) Training

CRF PART	FEDERAL REGISTER	STANDARD "QUOTE"
1910.134 Respiratory protection	p. 22231	(3) The employee shall use the provided respiratory protection in accordance with instructions and training received. (b) Requirements for a minimal acceptable program. (1) Written standard operating procedures governing the selection and use of respirators shall be established. (2) Respirators shall be selected on the basis of hazards to which the worker is exposed. (3) The user shall be instructed and trained in the proper use of respirators and their limitations.
	p. 22232	(2) The correct respirator shall be specified for each job. The respirator type is usually specified in the work procedures by a qualified individual supervising the respiratory protective program. The individual issuing them shall be adequately instructed to insure that the correct respirator is issued. (3) Written procedures shall be prepared covering safe use of respirators in dangerous atmospheres that might be encountered in normal operations or in emergencies. Personnel shall be familiar with these procedures and the available respirators.

- (1) Taken from U.S. Dept. of Labor bulletin - OSHA 2082 & titled "Training Requirements of the Occupational Safety and Health Standards".

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CRF PART	FEDERAL REGISTER	STANDARD "QUOTE"
* The Baton Rouge Plant Safety Office does not think it is necessary for safety purposes to wear in test atmosphere at the Baton Rouge Plant at this time.		(5) For safe use of any respirator, it is essential that the user be properly instructed in its selection, use, and maintenance. Both supervisors and workers shall be so instructed by competent persons. Training shall provide the men an opportunity to handle the respirator, have it fitted properly, test its face-piece-to-face seal, wear it in normal air for a long familiarity period, and finally,* to wear it in a test atmosphere. (1) Every respirator wearer shall receive fitting instructions including demonstrations and practice in how to adjust it, and how to determine if it fits properly. To assure proper protection, the facepiece fit shall be checked by the wearer each time he puts on the respirator. This may be done by following the manufacturer's facepiece fitting instructions.
1910.178 Powered industrial trucks.	p.22257	(1) Operator training. Only trained and authorized operators shall be permitted to operate a powered industrial truck. Methods shall be devised to train operators in the safe operation of powered industrial trucks.
1910.217 Mechanical power presses.	p. 22288	(3) Training of maintenance personnel. It shall be the responsibility of the employer to insure the original and continuing competence of personnel caring for, inspecting, and maintaining power presses. (2) Instruction to operators. The employer shall train and instruct the operator in the safe method of work before starting work on any operation covered by this section. The employer shall insure by adequate supervision that correct operating procedures are being followed.

CRF PART	FEDERAL REGISTER	STANDARD "QUOTE"
1910.252 Welding, cutting, and brazing.	p. 22305	(iii) Instruction. Workmen designated to operate arc welding equipment shall have been properly instructed and qualified to operate such equipment as specified in subparagraph (4) of this paragraph.
	p. 22306	(iii) Personnel. Workmen designated to operate resistance welding equipment shall have been properly instructed and judged competent to operate such equipment.
	p. 22307	(6) Maintenance. Periodic inspection shall be made by qualified maintenance personnel, and records of the same maintained. The operator shall be instructed to report any equipment defects to his supervisor and the use of equipment shall be discontinued until safety repairs have been completed.
1910.264 Laundry machinery and operations	p. 22331	(v) Instruction of employees. Employees shall be properly instructed as to the hazards of their work and be instructed in safe practices, by bulletins, printed rules, and verbal instructions.

(2) RECORD KEEPING

A brief explanation is given here - you will find full explanation in the reference standard numbers.

SUBPART	SECTION	PARAGRAPH	EXPLANATION
I	Respiratory protection	1910.134 (e)(2)	Recording issue date for respirators
		1910.134 (f)(3)(iv)	Record of inspection dates and findings for respirators maintained for emergencies

(2) Taken from "Table of Specialized Records," published in National Safety News, March 1973.

SUBPART	SECTION	PARAGRAPH	EXPLANATION
I	Portable fire extinguishers	1910.157 (d)(3)(iv)	Tag on fire extinguisher to show date of maintenance or recharge and identification of person performing this service
		1910.157 (d)(4)(viii)	Hydrostatic test date of fire extinguishers
	Fixed dry chemical extinguishing systems	1910.160 (c)(1)(iii)	Report and recommendations of the inspector
N	Overhead and gantry cranes	1910.179 (m)(1) and (2)	Report of monthly rope inspections
		1910.180 (d)(6)	Record of monthly inspection of critical items (brakes, crane hooks, ropes)
	Crawler, locomotive, and truck cranes	1910.180 (g)(1) and 1910.180 (g)(2)(ii)	Monthly rope inspection records
		Derricks 1910.181 (g)(1) and (3)	Monthly rope inspection records
O	Mechanical power press	1910.217 (e)(1)	Inspection and maintenance records
	Forging machines	1910.218 (a)(2)(i) and (ii)	Records of safety inspections
Q	Welding, cutting and brazing	1910.252 (c)(6)	Records of periodic inspection of resistance welding equipment

With the assumption that you will comply with the requirements as they pertain to your organization, will you please advise me of action taken to comply and to keep in compliance.


S. A. D'Armond

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