DU PONT

E. I. DU PONT DE NEMOURS & COMPANY

FILM DEPARTMENT

PLAINTIFF'S EXHIBIT
DUP-266

K. R. Osborn
Film Plant Managers
J. V. Thackston
F. D. O'Hara
W. E. Neff

Clinton, Iowa
November 9, 1972

H. E. LINDHE
PLANT MANAGER
CLINTON FILM

OSHA INSPECTION
CLINTON FILM PLANT
NOVEMBER 1-2, 1972

The attached "Report on OHSA Inspection" gives the salient facts concerning this inspection. This is the only known "routine" inspection made in the Company, so it might be useful to provide additional detail for general information.

The inspector indicated this plant was picked for a routine inspection because it was the largest plant in the area. The only unusual request for preliminary information concerned the total number of male employees versus the number of female employees during a typical daytime period. He reviewed the OHSA Forms #100 and 101 from our files and copied most of the information from these forms. He advised this information was only used to document need for corrective action where other deficiencies were found on an inspection.

A plot plan was used for a brief review of the plant and process. The inspector indicated from the plan the areas he would visit. He indicated he was aware of the Du Pont Company's safety activity and records, and anticipated he would find very few items requiring correction to meet OHSA standards.

The Employee Relations Superintendent and the Union Vice President accompanied the inspector on the tour. The Works Engineer and Manufacturing Superintendent joined portions of the tour as did Area Supervisors involved in the particular areas. We freely asked various wage roll employees questions on specific items. The inspector talked to the wage roll only if we initiated the contact.

Powerhouse

1. Bunker Area - Noted very clean.
2. Bridge Crane - As noted in report. Also asked to see routine inspection records.
3. Switchgear - Asked what employees could have access.
4. Coal Unloading - R.R. - Checked electrical gear closely. Questioned bare 150 watt flood lamps located outside. Advised we felt satisfactory in this location.
5. Chlorine - Asked to see cylinder emergency repair kits.

Sheet Metal Shop

Questioned if National Electrical Code Article 670 or 400 applied to a 440 volt extension cord to "Lock Former". Indicated he would check and advise us later.

Paint Shop

1. We were advised the dry spray booth should have a sprinkler head behind the filter frames. It should be equipped with either a low air flow alarm or an air flow indicator. (Has been corrected)
2. He asked about paint fammability and noted some paint can label information.

Insulation Shop

He asked to see our "Asbestos Control Program". (Copy attached) Read and agreed our planned actions should be satisfactory. Very little of the program is in effect at this time.

Cellophane Casting Area

1. a) Inquired concerning the air source for fresh air masks used during castoff.
   b) Reviewed our monthly analysis for carbon monoxide.
   c) Asked to see alarms for high temperature on air compressors. We have high temperature shutdown and low pressure alarms. Was satisfied with this.
2. Asked for information on fresh air supply to the Casting Area. Agreed 10-15 changes per hour were satisfactory.

Miscellaneous Areas

1. Noted cloth fiber slings in the machine shop. Suggested they should be permanently labeled with load capacity information.
2. Scot Air Paks - Inquired if our paks had continuous alarms ringing prior to supply exhaustion. Confirmed that we used this type.
3. Fork truck and ride truck steering wheel "spinners" - asked if gearing was correct to prevent kick back that might cause operator injury. Called back five (5) days later to confirm our investigation. We had found gearing correct and/or trucks had power steering.
4. Sheeting Area Switch Gear - Suggested protection from fork trucks. Now corrected.
5. Warehouse - Suggested removal of overhead-hastily installed-long unused emergency light string. Now corrected.

<u>Miscellaneous Areas</u> (Continued)

6. Fork truck - battery charging stations - asked about $H_2$ buildup in these areas. We suggested general ventilation is adequate.
7. "Clysar"* Coating Bath Mix Building - Questioned type of cable in cable trays in this Class I, Division II, Group D area. No answer available. Requestioned us by phone 11/7.
8. Outside Contractor - Staging - Inspector checked beams and "tie-off" at sixth floor level for this paint job. No contractor employees on site. Suggested (did not request) a contact with contractor to advise of violation of OHSA regulations. Contractor was advised.

<u>General Questions</u>

1. Inquired about our fire protection equipment and fire crews.
2. Inquired about First Aid facilities and personnel.
3. Had a general conversation with the plant doctor concerning the use of respiratory equipment. (Not related to our particular situations)
4. Reviewed Engineering Standards on specified respiratory equipment.
5. The inspector took no noise level readings nor did he mention noise in our conversations.

<u>Closing Conference</u>

Present: Inspector, Employee Relations Superintendent and Works Engineer.

The Inspector asked what corrective action we planned as a result of the inspection tour omitting the "Lock Former". He was advised we would have the items corrected by November 6. He stated he would contact us on November 6 on the "Lock Former" and inquire as to our progress on the other items.

He indicated violations, citations, etc., would be determined by the District Director. He stated the reactions of the firms visited did influence to some extent the issuance of citations, etc.

J. L. Sparks

J. L. SPARKS, EMPLOYEE
RELATIONS SUPERINTENDENT

Attach.

1. Date of Inspection November 1 - 2, 1972 Time 2:00 P.M.

2. Employment Unit (Name plant, laboratory, warehouse, construction)

Clinton Film, Clinton, Iowa

3. OSHA region in which your unit is located No. 7, Kansas City, Mo.

Name(s) of Compliance Officer(s): Vldis S. (Sid) Levalds, Omaha, Nebraska

4. What prompted the Inspection? Routine

If a complaint, were you given written copy? -- Was it necessary to request copy? --

5. Was advance notice given? No

6. Duration of Inspection Nine (9) hours

7. What did the Compliance Officer inspect? Manufacturing buildings, Powerhouse, Warehouse, Maintenance Shops, etc.

What measurements did he make (e.g., air sampling for toxic vapors, noise, etc.)? None - no comment on noisy areas.

8. What violations did he find? "May be violations"

1. Missing track sweeps on 20-Ton Overhead Bridge Crane
2. Dry Spray Booth (Paint) - no airflow indicator, no sprinkler behind filters (Discharge side)
3. Physical protection (against Fork trucks) Switchgear-Sheeting Area
4. 440 cord to Lock Former - Sheet Metal - he will check to see if ok and advise

9. What citations did he issue? "May cite above"

0. Were the citations for specific standards or under the general duty clause? (Please identify the standards cited.) Specific Standards - 1910.178, 1910.107, (NFPA-ANSI National Elec. Code - Article 110-17(b)), Article 670 or 400

The questions apply to the visit of a Compliance Officer, but if inspection s by a representative of Health, Education and Welfare Department give swers which might pertain.

11. Citations which might warrant contesting None

12. What time was allowed for abatement? "May set times"

13. What penalties were assessed? "May be penalties"

14. How was the initial contact handled?

a. Compliance Officer first appeared at Guard House (Guardhouse, Main Office, etc.)

b. Asked to see Plant Manager

c. Presented credentials X voluntarily ____ upon request.

Was he state or federal employee? Federal

d. Did your unit have an established protocol for this eventuality?

Yes

e. Miscellaneous remarks about ease or difficulty in handling initial contact. He explained his camera to guards since he saw camera sign at gate. Did not sign normal security agreement "sign-in card".

5. Did officer talk with Safety Supervisor, Work's Engineer, Company Physician, or comparable people about overall safety and health program of installation either before or after inspection? (Give brief summary.)

Talked to all three of above about their specific sphere of operation

6. Did officer request to see any of the Company safety and health records or records of occupational hazard measurements (e.g., toxic vapors, dusts, noise, etc.)? ___ NO x YES. Remarks Specifically analysis for CO in air mask supply air

17. What representative(s) of employees accompanied officer on inspection?

Vice President of Union - Robert Fuller.

(Union Steward, complainee, etc.)

How was employee representative determined? Asked for Union Officer

18. What Company representative(s) accompanied officer on inspection?
Employee Relations Superintendent; Works Engineer and Manufacturing Superintendent - part time and several Area people part time

19. Were questions directed to employee representative(s) and Company representative(s) alike in presence of one another? x NO __ YES. Give some examples of what you consider to be most leading questions. One of few questions directed to Union representative was "did we miss anything we should see"

20. Did officer seem to be well versed in the various rules and regulations applicable to your operation? __ NO x YES. Was a copy of written rules and regulations taken along for instant reference? Any discussion there of, comparison with Company standards, etc.? Remarks Did not take rules along. Only comparison comment was on A.S.A. standards

21. Were photographs deemed necessary? Yes Who took them? Compliance Officer. Each of items (4) mentioned in Item 8 above

22. Comment on closing conference. Review 4 items in Item 8 above. Advised would cal in 4 days to clarify the power cord question and determine our progress on other items. Asked if we had any questions.

23. Do you have any general comments to make in way of a summary? Seemed to be well qualified inspector, concentrated on things and non-process items rather than peopl and process. Not interested in insignificant small items. Since this is one of the few inspections to date in the Company a more detailed letter is attached.

Signed H.C. Linck [signature] Unit Head