

DON'T SAY IT -- WRITE IT

TO Tommy Roberts 19
FROM David Hatts
SUBJECT OSHA Citations - BR Plant

Thought you would like to have a
copy of the citations the plant received
from the fall, 1976 inspection.

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

CITATION and NOTIFICATION OF PENALTY

2156 Wooddale Boulevard
Hoover Annex Building, Suite 200
Baton Rouge, Louisiana 70806

Original To:

TYPE OF VIOLATION(S)	CITATION NO.
OTHER	2

Ethyl Corporation
P. O. Box 341
Baton Rouge, LA 70821

Attn: Mr. W. C. Strader,
Resident Manager

CC:

Ethyl Corporation
Ethyl Tower, 451 Florida Blvd.
Baton Rouge, Louisiana 70801

Attn: Mr. F. D. Gottwald, Jr., Pres.

ISSUANCE DATE	OSHA NUMBER	
11/22/76	L1628 243	
REGION	AREA	PAGE
06	0150	1 OF 2

INSPECTION DATE:

8/25-9/23/76

INSPECTION SITE:

Gulf States Road
Baton Rouge, Louisiana

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES
ARE DUE
WITHIN 15
DAYS OF
RECEIPT
OF THIS
NOTIFICATION
UNLESS
CONTESTED
(See enclosed
Booklet)

This Section May
Be Detached
Before Posting

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
The violations described in this citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below.		
1 29 CFR 1910.1001(g)(2)(i): Caution labels were not affixed to all raw materials, mixtures, scrap, waste, debris, or other products containing asbestos fibers, or to their containers, which during any reasonably foreseeable use, handling, storage, disposal, processing or transportation could release airborne concentrations of asbestos fibers exceeding prescribed exposure limits: (a) Anode dumpster west of the caustic chlorine maintenances shop where carbon electrodes contaminated with asbestos are discarded. (b) The waste asbestos dumpster located in the caustic chlorine shop. (c) East end of the maintenance shop where asbestos is stored.	Immediately	\$0
2 29 CFR 1910.1001(h)(1): Places of employment were not maintained free of accumulations of asbestos fibers which, if dispersed, could result in an excessive concentration: (a) In the caustic chlorine maintenance shop where asbestos diaphragm deposition was done. There were asbestos accumulations on walls, ceiling, and equipment.	Immediately	\$0
3 29 CFR 1910.1001(h)(2): Asbestos waste, scrap, debris, bags, containers equipment, and asbestos-contaminated clothing, consigned for disposal, which may produce airborne levels of asbestos fibers in excess of prescribed limits was not collected and disposed of in sealed impermeable bags or other closed, impermeable containers: (a) Open anode dumpster west of the caustic chlorine maintenance shop where carbon electrodes contaminated with asbestos are discarded.	Immediately	\$0
4 29 CFR 1910.1017(h)(1)(ii): Employee(s) engaged in hazardous operations, including entry of vessels to clean polyvinyl chloride residue from vessel walls, were not provided with and required to wear protective garments to prevent skin contact with liquid vinyl chloride or polyvinyl	Immediately	\$0

* AREA DIRECTOR

J. E. Powell

On Last
Page

NOTICE TO EMPLOYEES - The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION - The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

**TOTAL PENALTY
FOR THIS
CITATION**
Make check or Money
Order Payable to
"DOL OSHA"
Indicate OSHA No.
on Remittance

CITATION and NOTIFICATION OF PENALTY

2156 Wooddale Boulevard
Hoover Annex Building, Suite 200
Baton Rouge, Louisiana 70806

Original To:

TYPE OF VIOLATION (See Regulation No. 1)	CITATION NO.
OTHER	2

Ethyl Corporation
P. O. Box 341
Baton Rouge, LA 70821

CC: Attn: Mr. W. C. Strader,
Resident Manager
Ethyl Corporation
Ethyl Tower, 451 Florida Blvd.
Baton Rouge, Louisiana 70801

Attn: Mr. F. D. Gottwald, Jr., Pres.

ISSUANCE DATE	OSHA NUMBER	
11/22/76	L1628	243
REGION	AREA	PAGE
06	0150	2 of 2

INSPECTION DATE:
8/25-9/23/76

INSPECTION SITE:
Gulf States Road
Baton Rouge, Louisiana

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES ARE DUE WITHIN 15 DAYS OF RECEIPT OF THIS NOTIFICATION UNLESS CONTESTED (See enclosed Booklet)

This Section May Be Detached Before Posting

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER	STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
	chloride residue from vessel walls: (a) Reactor A-19 in the PVC area being cleaned by an operator not wearing gloves and with his sleeves rolled up.		

AREA DIRECTOR
J. E. Powell

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION — The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

\$0
TOTAL PENALTY FOR THIS CITATION
Make check or Money Order Payable to "DOL OSHA"
Indicate OSHA on Remittance

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

CITATION and NOTIFICATION OF PENALTY

2156 Wooddale Boulevard
Hoover Annex Building, Suite 200
Baton Rouge, Louisiana 70806 Original To:

REPEAT 1 Ethyl Corporation
P. O. Box 341
Baton Rouge, LA 70821

Attn: Mr. W. C. Strader,
Resident Manager

CC:

Ethyl Corporation
Ethyl Tower, 451 Florida Blvd.
Baton Rouge, Louisiana 70801

Attn: Mr. F. D. Gottwald, Jr., Pres.

ISSUANCE DATE	OSHA NUMBER	
11/22/76	L1628	243
REGION	AREA	PAGE
06	0150	1 OF 1

INSPECTION DATE:
8/25-9/23/76

INSPECTION SITE:
Gulf States Road
Baton Rouge, Louisiana

THE LAW REQUIRES that a copy of this Citation be posted immediately in a prominent place at or near the location of the violation(s) cited below. The Citation must remain posted until the violations cited below have been corrected, or for 3 working days (excluding weekends and Federal holidays) whichever is longer.

PENALTIES
ARE DUE
WITHIN 15
DAYS OF
RECEIPT
OF THIS
NOTIFICATION
UNLESS
CONTESTED
(See enclosed
Booklet)

This Section May
Be Detached
Before Posting

This citation describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed below are based on these violations. You must correct the violations referred to in this citation by the dates listed below and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this citation and penalty you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. (See the enclosed booklet which outlines your responsibilities and courses of action and should be read in conjunction with this form.)

ITEM NUMBER STANDARD, REGULATION OR SECTION OF THE ACT VIOLATED: DESCRIPTION	DATE BY WHICH VIOLATION MUST BE CORRECTED	PENALTY
The violations described in this citation are alleged to have occurred on or about the day the inspection was made unless otherwise indicated within the description given below. 1 29 CFR 1910.1000(a)(2): Employee(s) were exposed to material(s) in excess of the 8-hour time weighted average limit(s) listed for the particular material(s) in table Z-1 of subpart Z of 29 CFR part 1910: 29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to reduce employee exposure(s) to within the limits for materials listed in tables Z-1, Z-2, and Z-3 of subpart Z of 29 CFR part 1910: 29 CFR 1910.134(a)(2): The employer did not provide the respirators which were applicable and suitable for the purpose intended: (a) Tetraethyl and/or tetramethyl lead on the fifth floor, "C" building. (b) Tetraethyl and/or tetramethyl lead on the first floor, "C" building. 1 - EFFECTIVE RESPIRATORY PROTECTION SHALL BE PROVIDED AND USED BY EMPLOYEES(S) AS AN INTERIM PROTECTIVE MEASURE. 2 - A WRITTEN, DETAILED SCHEDULE OF ABATEMENT, CONSISTENT WITH THE COMPLETE ABATEMENT (FINAL) DATE SHALL BE SUBMITTED TO THE AREA DIRECTOR. THIS SCHEDULE SHALL INCLUDE TARGET DATES FOR SUCH ITEMS AS: HIRING OF IDENTIFIED ENGINEERING CONSULTANTS; COMPLETION OF ENGINEERING STUDIES AND PRELIMINARY SURVEYS; DISCUSSIONS WITH OSHA AND DECISION ON OPTIMALLY FEASIBLE ABATEMENT PROGRAM TO BE IMPLEMENTED; ORDERING OF EQUIPMENT AND MATERIALS AND COMPLETION OF DESIGN PHASE; SELECTION OF CONTRACTOR; SUBMISSION OF REGULAR PROGRESS REPORTS. 3 - FEASIBLE ENGINEERING CONTROLS AND/OR ADMINISTRATIVE CONTROLS IF NO ENGINEERING CONTROLS ARE FEASIBLE SHALL BE DETERMINED. 4 - ABATEMENT SHALL BE COMPLETED AT WHICH TIME FEASIBLE ENGINEERING AND/OR ADMINISTRATIVE CONTROLS SHALL BE IMPLEMENTED AND EMPLOYEES SHALL NOT BE SUBJECT TO EXPOSURES EXCEEDING THOSE LISTED IN TABLES Z-1, Z-2 AND Z-3 OF SUBPART 2 OF 29 CFR 1910.	STEP ONE Immediately STEP TWO 12/16/76 STEP THREE 1/31/77 STEP FOUR 11/22/77	\$2,000
AREA DIRECTOR J. E. Powell		\$2,000

NOTICE TO EMPLOYEES — The law gives an employee or his representative the opportunity to object to any abatement date set for a violation if he believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this citation and penalty.

EMPLOYER RESPONSIBILITIES AND COURSES OF ACTION — The enclosed booklet outlines employer responsibilities and courses of action and should be read in conjunction with this notification.

EMPLOYER DISCRIMINATION UNLAWFUL — The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he has been discriminated against may file a complaint no later than 30 days after the discrimination with the U.S. Department of Labor Area Office at the address shown above.

TOTAL PENALTY
FOR THIS
CITATION
Make check or Money
Order Payable To
"DOL-OSHA"
Indicate OSHA No.
on Remittance