

CHEMICALS



INTEROFFICE / LAKE CHARLES

TO E. J. Tullier

DATE January 23, 1976

FROM B. W. Walker *BW*

SUBJECT OSHA Compliance

I conducted a mock OSHA inspection in the Liquefaction and Brine Treatment areas on January 22, 1976. This is a continuance of the inspections which will cover all of Production "A" facilities. These inspections were requested by R. F. Kaspar to determine the compliance status in his area of responsibility.

The most significant items noted involved inadequate guarding of platforms in the scale tank area. Another problem is the guards on pump couplings. House-keeping was also a problem, especially in the Ammonia Compressor Building. I should also point out that ammonia was present in the atmosphere inside the building to the extent that it was irritating to the eyes and upper respiratory system. We should begin efforts to control the ammonia in the atmosphere prior to the issuance of a standard by OSHA. At present, NIOSH has issued a proposed criteria document on ammonia and past precedent dictates that OSHA will follow suit with a proposed standard.

The violations listed on the accompanying pages should be corrected as soon as possible. A report outlining the corrective action taken should be sent to me after the corrections have been made.

/bc

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| BB 0000 293 |

LIQUEFACTION - BRINE TREATMENT

<u>STANDARD</u>	<u>ITEM</u>
1910.309(a) (NEC 110-22)	1. Electrical panel boxes on the south wall, inside the Compressor Building Starter House, are not marked as to the contents.
1910.309(a) (NEC 250-5)	1. Electric wall outlet is not grounded properly (reversed polarity), on the north wall of the Compressor Building Starter House. 2. Electric wall outlet in the Liquefaction Foreman's office has an open ground.
1910.309(a) (NEC 400-4)	1. Temporary wiring in piperack near walkway to the Chlorine Tank Car Loading Rack.
1910.22(a) (1)	1. Poor housekeeping on ground level near and around delivery station #7. 2. Poor housekeeping inside south end of Ammonia Compressor Building. 3. Poor housekeeping at east wall inside Ammonia Compressor Building, near telephone.
1910.23(a) (9)	1. Open grating under Chillers, near scale tanks.
1910.23(e)	1. No toeboards on platform at the east end of Vilter Condensers. 2. No toeboards on east side of Sulphuric Acid Storage Tank platforms. 3. No toeboards on short platform, off stairs leading to top of vertical condensers. 4. Damaged midrail on stairs leading to top of vertical condensers. 5. No handrails, midrails, or toeboards on platforms around scale tanks.
1910.27(d) (2)	1. Fixed ladder above allowable length without an intermediate platform on the DS tank.

1910.28(a)(3)

1. No midrail on temporary wood platform in piperack above ammonia compressors.

1910.134(f)(5)(i)

1. Emergency respirator box unmarked at north scale tanks. (Two others in area were lightly marked.)

1910.157(a)(3)

1. Fire extinguisher #315 obstructed by pipe. Located near acid pumps inside Ammonia Compressor Building.

1910.157(a)(5)

1. Fire extinguisher sitting on floor of platform above York Secondary Compressor.

1910.219(d)

1. Open guard on oil pump, north side of York Secondary Compressor, near acid storage tank.

2. Inadequate guard on belt and pulley on Freon Pump-Out Compressor.

1910.219(i)

1. Inadequate coupling guards on Ash Liquor Pumps (Ckt. 810 & 703)

2. Inadequate coupling guards on finished brine pumps.

General Duty Clause

1. Open drum of 1,1,1 Trichloroethane with siphon hose in bung opening. Indicates that employees are transferring the liquid with a siphon.

2. Chainfall on second level above York Secondary Compressor with improper inspection code. Chains are rusting.