

the machine is designed for the trimmings to fall under the machine for later removal. The particular time he came in, the trim was still under the machine because it is DANGEROUS to remove this trim while the machine is operating.

After the inspection Mr. Anderson stopped in the office and issued a Notice of Violations of which the first item was 1. Housekeeping (Clean up all waste material from the floor in the passageways and around the machines as often as necessary to maintain a safe work place.)

Section 11-2306. Insofar as the nature of the work will permit, the workplace shall be kept free of discarded material, refuse, debris, protruding or upturned nails, and other unnecessary materials or equipment which may cause persons to trip or fall.

With the interpretations that Inspector Anderson has made of the violations of the 1961 inspection, he could at his whim charge us and fine us for this violation any time he appears in the plant and we are trimming any printed pieces on the folding machine. We are completely at his mercy with no right of appeal as Mr. Green has stated except to go through a costly and time-consuming court case.

Item 2. Standard Railings (provide standard railings along the exposed edge of the storage platform).

Please note the inspector listed on his notice "storage" platform; I think that this is an example of a completely incorrect interpretation of the regulations, Section 11-2312 which reads as follows:

11-2312. Standard railings shall be provided along the exposed edges of all floor openings, wall openings, ramps, platforms, runways, or other workplaces, to prevent the falls of persons.

Standard railings shall be of the following, or equivalent, construction:

(a) Posts or uprights set not more than 8 feet apart, center to center.

(b) A top rail, the top of which is not less than 36 inches nor more than 42 inches above the floor or platform.

(c) An intermediate rail midway between the floor and the top rail.

The minimum dimensions of members of wood railings shall be: posts 2x4 inches; top rail 2x4 inches; intermediate rail, 1x6 inches.

From the language of this section, in or out of context, it states—platform, or other workplaces to prevent falls of persons. The distance from the top of our storage platform to the ceiling is 36" and obviously, no one could work, stand or walk there, much less work there. The storage platform was exactly that—and the inspector saw this, since there was about 30 cases of 48" fluorescent light tubes stored on it. I pointed this out to the inspector to no avail.

Item 5. Electrical (Effectively ground the non-current-carrying parts of the following items by the multi prong (3 or more) system or other method approved by the D.C. Electrical Code and the U.S.A.S.I. Code: 4 time clocks, 1 Davidson press, 1 water cooler, 1 light table. . . .

In item 5 of the Violations Notice of 1967, Mr. Anderson commands us to effectively ground a water cooler; we do not have a water cooler; we do have a water fountain which is positively grounded merely by having a water pipe directly connected to it. It seems the inspector does not know the difference between a free standing water cooler and a water fountain connected to the water and sewer system.

Inspector Anderson requested to see the fire extinguishers which were shown to him. His only inspection of them was to look at the label. We have a fire inspector who comes periodically and inspects the fire extinguishers; but his inspection is thorough, he tests the various moving parts and weighs them to see that they are fully charged. The Safety Divisions inspection seems to be perfunctory and superficial.

Item 6. Machine Guards (Install a cylinder guard on the Little Chief 20 press. Install guards covering the drive belts and pulleys on the following machines: 1 Ludlow machine, 1 Little Chief 20 press, 1 folder compressor and 1 Davidson press. All guards must be constructed out of 22 gage sheet metal or the equivalent and securely fastened in place. Install a small mesh guard over the delivery end of the chief 15 press.)

Section 11-2341. All power driven machinery shall be properly guarded. Effective point-of-operation guards shall be provided and used on all power-driven tools the use of which presents a recognized hazard to the operator or other workers. All guards shall be constructed in a substantial manner, and shall be effectively installed and maintained.

After the inspection in 1961, we immediately ordered a guard for our press from the Davidson Corporation; we received it about 1 month later and installed