PLAINTIFF'S EXHIBIT

UC-2062

12/11/78

Dick

I don't like any part of this study. Use of OSHA form 103 (survey) data is full of holes – will discuss if you desire.

Another 'Unbiased History of the Civil War from the Southern Viewpoint'

Could be a trap.

Warren W. A. ROQUET

LAM 025358

ABS-031741

REFERENCE 09-SAF

SHELL OIL COMPANY

DATE DECEMBER 5, 1978

TO H. L. KUSNETZ

FROM J. L. RIVARD

SUBJECT CEP STUDY OF SAFETY AND HEALTH IN THE CHEMICAL INDUSTRY

Attached for your information is a proposal by a non-profit organization called The Council on Economic Priorities (CEP) to study "Occupational Safety and Health in the Chemical Industry". This proposal was forwarded by ORC.

Shell is not one of the target chemical companies. However, the companies selected include the top eight chemical firms (See page 4).

The study will examine three areas of performance:

1) Occupational injury and illnesses (available from OSHA logs)
2) Compliance with OSHA regulations (to be obtained from OSHA's inspection files)
3) Corporate programs to advance occupational safety and health (to be requested via a questionnaire)

This study will be strongly biased by 1) the union affiliation of the project director (See page 3), and 2) the advisory board (See page 22-23).

The study will require two years, at an approximate cost of $210M.

It appears that Shell has no direct involvement. However, the eight target companies will have to decide to what extent they will cooperate with part three of the study, which will request fairly complete information on a variety of programs.

Note that mental health care programs and health insurance benefits are included in part three of the study, as well as workers compensation and occupational medicine programs.

The CEP professes to be a non-profit organization which examines the social performance of U.S. Corporations (see inside front cover). I have asked Roy Sloan to find out more about the CEP.

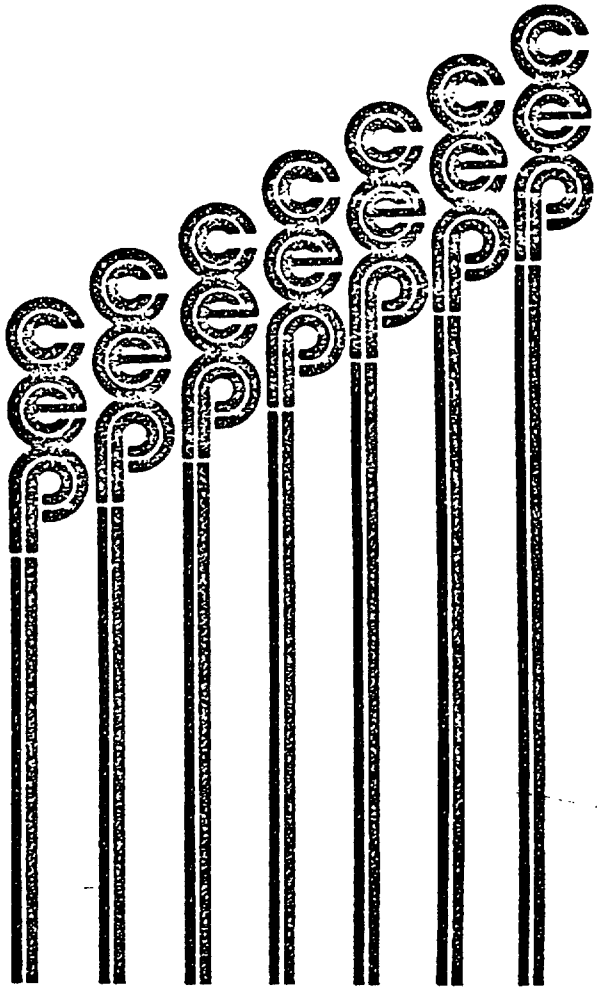
Attachment

cc: P. F. Deisler/R. D. Mullineaux
R. L. Brunner
R. H. Coe
R. E. Joyner
D. H. McClintic
H. J. McDermott
R. M. Sloan

LAM 025359

ABS-031742

THE COUNCIL ON ECONOMIC PRIORITIES



LAM 025360

ABS-031743

Union Carbide trial exhibit UC-2062: W. A. Roquet Note to Dick on the Council on Economic Priorities Chemical Ind...
ACL Doc 17084 · Page 4 of 46

What CEP Does

The Council on Economic Priorities (CEP) is a non-profit organization which examines the social performance of U.S. corporations. Through unbiased, in-depth studies, CEP investigates and compares the practices of companies in such areas as equal employment, environmental impact, consumer health and safety, foreign investment, political influence, and military production.

The purpose of Council studies is to make available to the public credible, objective information on corporate performance. The Council uses comparative standards to rank firms within an industry. It presents the data, and lets the facts speak for themselves. The Council's efforts to examine the full spectrum of corporate activity have resulted in detailed analyses of pricing structure in the pharmaceutical industry, environmental controls in steel manufacturing and oil refining, environmental practices of the pulp and paper industry and corporate participation in weapons manufacturing. All major studies are updated periodically.

CEP is a powerful and innovative force behind corporate self-evaluation, consumer activism, federal and local legisla-

LAM 025361
ABS-031

The Impact of CEP Studies

- After the release of *Power Plant Performance*, CEP's comparison of the efficiency and costs of nuclear and coal-fired power, the Federal Energy Administration decided to purchase our data base because such a complete compilation was not available from any other source.
- After a CEP researcher testified that planned construction of two nuclear power plants by the Long Island Lighting Company (LILCO) would be unprofitable LILCO postponed plant construction for two years and sold half its interest in the plants to another utility.
- After CEP's release of *Military Maneuvers*, an audit of possible conflict of interest situations arising when retired military personnel take jobs with defense contractors, the Joint Committee on Defense Production held hearings on the subject, and heard testimony from CEP's Executive Director; and a bill was passed in the House and introduced in the Senate to eliminate the possibility of such conflicts for federal employees.
- After CEP's release of *Environmental Steel*, which showed that environmental controls wouldn't result in rampant plant closings and mass layoffs, the United Steelworkers of America endorsed efforts to make steel companies employ modern equipment to control air and water pollution.
- After CEP's release of *Paper Profits Pollution in the Pulp and Paper Industry*, one paper company which had done an especially poor job of cleaning up replaced its chief executive with one who began to aggressively tackle its emissions problems; in an update two years later, most of the industry was found to have undertaken adequate control

Who Uses CEP Studies

The varied applications of Council research attract a diverse group of subscribers who utilize CEP studies to effect substantial changes in corporate and political policy.

Corporations themselves find CEP data invaluable for its comprehensive analyses of competitors' practices and use CEP indicators to measure their own performance internally.

Consume groups and legislators use Council findings as a springboard for activist campaigns and as an unimpeachable technical reference. Financial analysts interested in following corporate earnings rely on CEP for investment guidance. Investors who are sensitive to the social responsibilities of corporations depend on CEP research, especially CEP's annual reporting on social-issue shareholder actions, for accurate social analyses of the companies in which they hold stock.

The Council continues to respond to the public's need for facts and figures about the social performance of U.S. corporations by making its studies available on a subscription basis. Subscribers receive copies of all CEP studies and reports and a newsletter which summarizes CEP activities. All subscribers are invited to attend private briefing sessions on each study, hosted by CEP president Alice Tepper Marlin and the study's

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(Continued from p. ng panel)

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OCCUPATIONAL SAFETY AND HEALTH IN THE CHEMICAL INDUSTRY

The Goal of the Study

The proposed study will attempt to assess corporate performance on occupational safety and health issues in the eight largest chemical companies in the United States.

The Need for the Study

The true dimensions of occupational injuries and illnesses can at present only be estimated.

The National Safety Council estimates that in 1977, approximately 13,000 workers lost their lives and 2,300,000 were disabled in work-related accidents.

Statistical evidence for occupational disease is considerably more difficult to obtain, but the Department of Health, Education and Welfare estimates that 390,000 new cases of occupationally related diseases are diagnosed each year, and that the death toll for occupational disease is approximately 100,000 people annually.

Of particular concern are multiple exposures to chemicals that may initiate or promote cancer, the second leading cause of death in the United States today. In 1977, approximately 370,000 Americans died of cancer, and an additional 675,000 were diagnosed with the disease. In a recently released study by the National Cancer Institute and the National Institute of Environmental Health Sciences, it was reported that occupational exposures to cancer causing chemicals may account for at least 20% of all cancers and that this estimate "may even be conservative."

Few, if any, publicly available studies on corporate performance have been concerned with the occupational safety and health of the workers employed by the corporation. Furthermore, both government reports and private studies do not disclose the identity of companies that participate in occupational safety and health surveys.

A comparative analysis of corporate occupational safety and health performance that identifies the participating companies would therefore be a most useful addition to the literature of both industrial occupational safety and health and corporate social responsibility.

CEP chose to study the chemical industry because it is an industry fraught with hazards both to human health and the environment. The chemical industry is highly diversified and complex, and offers the opportunity to study many different types of occupational safety and health hazards.

Criteria for the Assessment of Occupational Safety and Health Performance

The study will investigate:

1. Occupational injury and illness diagnosis and recording by plant as required by the Occupational Safety and Health Administration (OSHA).

2. Corporate compliance with regulations promulgated by OSHA;

(over)

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3. Corporate promgrams to advance occupational safety and health in the plants, including: capital investments, occupational medicine, industrial hygiene and health insurance benefits.

The Information and Data Base

Work Related Injury and Illness

The information base for the analysis of corporate injury and illness experience will be the reports of work related injuries and illnesses (OSHA Forms 100, 101, and 102) since 1972. For 1978, the OSHA 200 Form (consolidated from the OSHA 100 and 102 Forms), and the OSHA 101 Forms will be used. These completed forms are required to be kept at each facility, and under the provisions of a newly promulgated OSHA rule, are available to workers at the plant upon request or to a duly authorized representative.

Corporate OSHA Compliance

Corporate compliance with OSHA regulations will be determined from an analysis of the inspection case files for all facilities owned and operated by the eight companies that have been inspected by OSHA since 1972 which was the first full year of OSHA compliance activity. Data developed from the inspection case files will be made available by OSHA's Office of Management Data and Statistical Analysis.

Corporate Occupational Safety and Health Programs

Information on corporate programs in occupational safety and health will be requested directly of the eight companies in the form of a questionnaire developed especially by CEP for the study.

Composite Ranking for Corporate Effectiveness in Occupational Safety and Health

A composite ranking for corporate effectiveness in occupational safety and health will be attempted. This ranking will be the result of ratings developed for each of the principal areas of investigation: the company's injury and illness experience, the OSHA compliance record, and for rates developed for corporate occupational safety and health programs.

The Companies to be Studied

The companies that will be studied are (listed in order of annual sales for 1977):

- o E.I. DuPont de Nemours and Company
- o Union Carbide Corporation
- o The Dow Chemical Company
- o Monsanto Company
- o W.R. Grace & Company

more...

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The Companies to be Studied (cont.)

- o Allied Chemical Corporation
- o American Cyanamid Company
- o Celanese Corporation

Funding Requirements

The proposed study will require two years to complete. Its entire cost will be $212,951.

The Author

The author and project director of the proposed study will be Matt Meyers. Mr. Meyers received his Bachelor of Arts degree from Princeton University in 1970 where he majored at the Woodrow Wilson School for Public and International Affairs. He earned his Masters degree in Public Health from the Columbia University School of Public Health, majoring in Environmental Health Sciences with a specialty in Occupational Safety and Health.

Mr. Meyers has worked as Assistant Administrator of the Local 259 United Automobile Workers Union (U.A.W.) Health and Pension Funds where he helped to establish an occupational safety and health program, and was editor of the local union newspaper. He has also served as Field Representative of the Textile Workers Union Health Plan.

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A PROPOSAL

TO STUDY OCCUPATIONAL SAFETY AND HEALTH IN THE CHEMICAL INDUSTRY

Revised

September 1978

LAM 025366

by

Matt Meyers

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List of Exhibits

Exhibit 1
OSHA 100 Form: Log of Occupational Injuries and Illnesses 12a

Exhibit 2
OSHA 101 Form: Supplementary Record of Occupational Injuries and Illnesses 13a

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OSHA 102 Form: Annual Summary of Occupational Injuries and Illnesses 13b

Exhibit 4
OSHA 200 Form: Log and Summary of Occupational Injuries and Illnesses 14a

Exhibit 5
OSHA 1 Form: Safety and Health or Accident Inspection Report 16a

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Goal of the Study

The goal of the study is to assess corporate performance for occupational safety and health in the eight largest corporations in the United States chemical industry.

The Need for the Study: The Public Interest in Corporate Occupational Safety and Health Information

The true dimensions of occupational injuries and illnesses can at present only be estimated.

The National Safety Council estimates that in 1977, approximately 13,000 workers lost their lives and 2,300,000 were disabled in work-related accidents.

Statistical evidence for occupational disease is considerably more difficult to obtain, but the Department of Health, Education and Welfare estimates that 390,000 new cases of occupationally related diseases are diagnosed each year, and that the death toll for occupational disease is approximately 100,000 people annually.

Of particular concern are multiple exposures to chemicals that may initiate or promote cancer, the second leading cause of death in the United States today. In 1977, approximately 370,000 Americans died of cancer, and an additional 675,000 were diagnosed with the disease. In a recently released study by the National Cancer Institute and the National Institute of Environmental Health Sciences, it was reported that occupational exposures to cancer causing chemicals may account for at least 20% of all cancers and that this estimate "may even be conservative."

Few, if any, publicly available studies on corporate social performance have been concerned with the occupational safety and health of the workers employed by the corporation. Furthermore, both government reports and

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private studies in occupational safety and health typically do not disclose the identity of the companies that have been surveyed.

For example, the Bureau of Labor Statistics' annual report on Occupational Injuries and Illnesses in the United States, and the National Safety Council's annual Accident Facts as a matter of policy do not disclose the names of their sample companies, but organize their information according to type of industry, size of the firm, (number of employees), and region.

CEP believes that the public has the need and the right to know the OSHA compliance record of a firm, the human costs of production (injuries and illnesses), and corporate programs to minimize the human and economic costs associated with occupational injuries and illnesses.

Given the almost continuous controversy surrounding OSHA, a study of its enforcement activities regarding particular firms would enhance the public's knowledge not only of corporate performance in this field, but also how OSHA has functioned, and what results the agency's activities have had on occupational safety and health in these firms.

Data on corporate occupational safety and health performance would be of greatest relevance to the working public employed by the eight companies, for although they are exposed most intimately to the hazards of their working environments, they typically lack information regarding working conditions, work-related injuries and illnesses, and OSHA compliance activities.

In addition, such information may also be useful to consumers who may choose to use these corporate profiles to help them decide which products to buy, and therefore which companies to support.

Similarly, stockholders may find corporate safety and health data

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useful input in their analysis of the true costs of production and the efficiency of a firm. In particular, trustees of trade union and other large pension fund portfolios might use corporate occupational safety and health data as input in their investment decisions.

Managers of the eight companies, trade union officers, staff, and safety and health specialists, may find the proposed study useful in the assessment of their safety and health record, as compared with the other companies of the study. This comparative assessment may help to stimulate greater efforts in the field.

- Finally, public interest groups will find the proposed study useful in developing coordinated strategies to combat chemical pollution both inside and outside the work place.

CEP has long been interested in studying the chemical industry, an industry fraught with hazards both to human health and the environment. The chemical industry is highly complex and diversified. The hazards of industrial enterprise (i.e., machine accidents, falling objects, noise, electrical hazards, etc.) are compounded by the increased risks of fire and explosion of flammable chemicals, and by multiple exposures to chemicals having toxic effects.

It was decided that the largest firms in the industry would be studied because: 1) OSHA inspections tend to occur more frequently in larger firms and therefore the data base would be larger; 2) injury and illness records would likely be more complete and accurate than for smaller firms; 3) their diversity of products and processes would enable CEP to analyze a wide variety of working environments and hazards; 4) as leaders in their industry, they have the resources and capabilities to implement "state of the art" practices in pollution control and safety and health recording and reporting; and 5) a study of large, nationally known

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companies would be of greater interest to the general public and would likely gain the attention of larger numbers of people, than a study of smaller firms.

Companies to be Studied

The companies that will be studied are (listed in order of annual sales for 1977):

- E.I. DuPont De Nemours and Company
- Union Carbide Corporation
- The Dow Chemical Company
- Monsanto Company
- W.R. Grace & Co.
- Allied Chemical Corporation
- American Cyanamid Company
- Celanese Corporation

The study will be based upon facilities owned and operated by these eight companies within the United States, that are under the jurisdiction either of the Occupational Safety and Health Administration (OSHA) of the United States Department of Labor, or State Occupational Safety and Health Plans, authorized by OSHA under the provisions of the Occupational Safety and Health Act (OSHAct) of 1970.

Organization of the Study

The study will be divided into chapters that are summarized below:

Chapter I. Introduction and Background

The history and growth of the eight chemical companies, their plant locations, products, economic and financial information, and worker demographics will be described.

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Chapter II. Work Related Injuries and Illnesses (1972-1978)

The OSHAct requires that occupational injuries and illnesses be logged and summarized annually for each plant. Under a newly promulgated rule, workers are guaranteed access to both the log and summary. CEP will attempt to gather these logs and annual summaries for all plants owned and operated by the eight companies, so that complete injury and illness profiles can be obtained.

Chapter III. The OSHA Compliance Record (1972-1978)

An analysis of information contained in the OSHA inspection case files for those facilities owned and operated by the eight companies, that have been inspected by OSHA since 1972, (the first full year of OSHA inspections), will be performed.

Chapter IV. Corporate Occupational Safety and Health Programs (1972-1978)

Important aspects of corporate occupational safety and health programs will be evaluated. These programs will be: capital investments for occupational safety and health (engineering controls); workers' compensation awards and premiums paid; occupational medicine and mental health care services; industrial hygiene; workers' rights; and health insurance benefits.

Chapter V. Corporate Cooperation

Corporate cooperation with the CEP study will be described and rated.

Chapter VI. Evaluation of Results

The proposed study will attempt to rank the eight corporations for effectiveness in occupational safety and health. This ranking will be based upon ratings developed for the three principal areas of investigation: 1) work related injuries

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and illnesses; 2) OSHA compliance; and 3) corporate programs in occupational safety and health.

Chapter VII. Policy and Program Proposals

Where research has uncovered areas for improvement, the study will recommend policy and program changes that might result in increased occupational safety and health in the eight companies.

Definition of Occupational Safety and Health

Occupational safety and health is a positive state of well-being for people at work.

A Joint Committee of the International Labor Office and the World Health Organization provides the following definition:

> "...the promotion and maintenance of the highest degree of physical, mental and social well-being of workers in all occupations; the prevention among workers of departures from health caused by their working conditions; the protection of workers in their employment from risks resulting from factors adverse to health; the placing and maintenance of the worker in an occupational environment adapted to his (or her) physiological and psychological condition." (1)

An effective occupational safety and health program is one that results in a working environment that is free from known hazards (at a given point in time and scientific understanding), and thereby maintains health by reducing work related injuries and illnesses to the greatest extent possible.

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OSHA: A Brief Background

The OSHAct of 1970

The Occupational Safety and Health Act became law on December 29, 1970 (Public Law 91-596), to "assure safe and healthful working conditions for working men and women" employed in businesses affecting interstate commerce. Approximately 56 million workers employed in an estimated five million work places are covered by the Act.

The law was passed in response to the growing awareness in the 1960s that both environmental conditions and the health of working people needed more rigorous protection in the nation's work places, than the individual states had been able to achieve. Thus, a federal health and safety law was passed to "preserve our human resources," and to attain the "highest degree of health and safety for the employee."

Section 5 of the Act is of particular importance. Known as the "General Duty Clause," it requires that employers provide places of employment that are "free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees," and comply with the occupational safety and health standards, rules, regulations and orders duly promulgated pursuant to the Act.

The OSHAct established three federal agencies to administer and enforce the law. The Occupational Safety and Health Administration (OSHA) was created within the United States Department of Labor with the responsibility of administering the provisions of the Act, establishing mandatory safety and health standards, and enforcing these standards through the inspection process.*

---

*The effect of the recent Supreme Court ruling in the Barlow case, requiring that OSHA inspectors obtain warrants if refused entrance by an employer, will be monitored by CEP during the course of the study.

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The National Institute of Occupational Safety and Health (NIOSH), located in the Department of Health, Education and Welfare was formed from the former Bureau of Occupational Safety and Health. NIOSH is the research agency responsible for developing and recommending occupational safety and health standards (criteria documents), conducting on-site health hazard evaluations, and promoting occupational safety and health education, training and research.

The third agency established by the OSHAct is the Occupational Safety and Health Review Commission which is an independent, quasi-judicial review board, consisting of three members appointed to six year terms by the President. The Review Commission is responsible for ruling upon all enforcement activities of OSHA that have been challenged. Judicial review of the Commission's rulings can be made in the federal courts of appeals.

State Plans

The Act requires that OSHA encourage the individual states to develop and operate their own safety and health programs which must be "at least as effective" as the federal program.

Presently there are 23 states and Puerto Rico that have functioning state plans. All are funded by OSHA at 50%. States with functioning state plans approved by OSHA are listed below, in order of their approval dates:

States	Date of Approval
So. Carolina	11/30/72
Oregon	12/22/72
Utah	1/4/73
Washington	1/19/73
No. Carolina	1/26/73
California	4/24/73
Minnesota	5/29/73
Maryland	6/28/73
Tennessee	6/29/73
Iowa	7/12/73

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States	Date of Approval
Kentucky	7/23/73
Alaska	7/31/73
Virgin Islands	8/31/73
Michigan	9/25/73
Vermont	10/1/73
Connecticut	12/28/73
Hawaii	12/28/73
Nevada	12/28/73
Indiana	2/25/74
Wyoming	4/25/74
Arizona	10/29/74
New Mexico	12/4/75
Virginia	9/23/76
Puerto Rico	8/15/77
TOTALS 24	

OSHA Standards

The primary function of OSHA is to promulgate and enforce occupational safety and health standards for working environments under its jurisdiction.

In the spring of 1971, OSHA promulgated its initial package of standards, consisting of already existing federal standards and "national consensus standards" that had been developed by such organizations as the National Fire Protection Association, and the American National Standards Institute.

OSHA standards are divided into three major categories: those for General Industry, Maritime, and Construction. The proposed study will be concerned mainly with standards that have been developed for General Industry, (29 CFR 1910).

OSHA Inspections

OSHA inspections are characterized by the type of event or phenomena that initiates the inspection. There are, accordingly, six types of OSHA inspections that are listed below in order of inspection priority:

1. Imminent Danger. This situation is given top inspection priority by OSHA and is defined as a condition where there is reasonable certainty that a hazard with the potential to cause death or serious physical harm is likely to occur before normal enforcement procedures can be completed.

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2. Fatality/Catastrophe. Second priority is given to investigations of incidents resulting in one or more fatalities, or where five or more workers have been hospitalized for twenty-four hours or more. Fatalities/catastrophes must be reported to the OSHA area office within 48 hours of their occurrence.

3. Investigation of Complaints. The Act gives all employees (who are covered by the provisions of the Act) the right to request an OSHA inspection if they believe that an OSHA standard is being violated.

4. Special Emphasis Programs (SEP). Inspections under the SEP focus on particular high hazard industries, occupations or toxic substances.

5. Regional Programmed Inspections. These are initiated by regional OSHA staff, based upon analysis of regional injury and illness rates in particular facilities that create a need for greater enforcement activity.

6. Follow-up Inspections. Facilities cited for serious violations are re-inspected to determine whether these violations have been corrected.

OSHA Violations

After the compliance officer has completed his or her investigation, the case is filed at the OSHA area office, where the area director reviews the inspection record and determines whether violations exist, and what citations, if any, will be issued. In some circumstances, the compliance officer has the authority to issue citations upon completion of the inspection and the closing conference.

There are six types of OSHA violations that may be cited:

1. Imminent Danger. This is a violation for a situation described above, where there is reasonable certainty that death or serious harm will occur before the normal enforcement procedures can be completed.

2. Serious. A serious violation is one that directly and adversely affects a worker in a way where there is "substantial probability that death or serious physical harm could result..." (2) The OSHA Field Operations Manual defines "serious physical harm" as a "permanent, prolonged, or temporary impairment of the body in which part of the body is functionally useless, or is substantially reduced in efficiency on or off the job." (3)
Serious injuries would require treatment by a physician and include amputations, fractures, deep lacerations requiring extensive suturing, disabling burns or concussions. Serious illnesses are defined

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as those that could "shorten life or significantly reduce physical or mental efficiency," such as cancer, silicosis, asbestosis, poisoning, and visual or hearing impairment. (4)

3. Other Than Serious Violation. This is a violation that directly threatens a worker's health or safety but in a way that would probably not result in serious injury or illness.

4. De minimus. De minimus violations have no direct effect or immediate relationship to safety or health. No penalties are imposed, nor are there any abatement requirements. These type of violations refer typically to violations of specifications i.e., the size of lettering for posting requirements and the like.

5. Willful. A willful violation is one where there is evidence that the employer committed an intentional and knowing violation of the Act, or, although not knowingly violating the Act, was aware that a hazardous condition existed but made no reasonable effort to correct it.

6. Repeated. A repeated violation may be cited whereupon re-inspection another violation for a previously cited standard, regulation, rule or order has been found.

Gravity of a Violation

The gravity of a violation is an assessment used in determining the severity of the injury or illness that could result from the alleged violation, and the degree of probability that the injury or illness will occur. Gravity assessment is made by the compliance officer and is used in the determination of penalties for the violations cited.

Penalties

Penalties are initially determined by the gravity of the violation (gravity based penalty), and may then be adjusted downward for such factors as the previous compliance record, size of the business, and demonstrated good faith of the employer in correcting previously cited violations.

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Criteria for the Assessment of Corporate Occupational Safety and Health Performance

- Work Related Injuries and Illnesses
- The OSHA Compliance Record
- Corporate Programs in Occupational Safety and Health

I. Work Related Injuries and Illnesses

The first criterion that will be used to assess corporate performance in occupational safety and health will be the frequency and severity of work related injuries and illnesses in the plants owned and operated by the corporations.

Data Base

Section 8(c) of the OSHAct requires that each employer maintain records of and make periodic reports for all deaths, and injuries and illnesses that are determined to be occupationally related, and that require more treatment than first aid.

OSHA has promulgated rules to implement Section 8(c) requiring that all employers covered by the Act that employ 11 or more workers, must maintain a log for all occupationally related deaths, injuries and illnesses as they occur (OSHA 100 Form), a detailed account of each work related injury or illness (OSHA 101 Form), and an annual summary of work related deaths, injuries and illnesses (OSHA 102 Form). Effective this year, the OSHA 100 and 102 forms have been consolidated in a single, OSHA 200 form, "Log and Summary of Occupational Injuries and Illnesses." In terms of internal recording requirements, there is no loss of available data in the consolidation from the OSHA 100, 102 forms, to the OSHA 200 system.

Employers who do not keep records as required by the Act and OSHA regulations are subject to citations and penalties.

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Exhibit 1

OSHA NO. 100

Form Approved
OMB No. 44R 1453

RECORDABLE CASES You are required to record information about every occupational death, every nonfatal occupational illness, and those nonfatal occupational injuries which involve one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment (other than first aid).
More complete definitions appear on the other side of this form.

LOG OF OCCUPATIONAL INJURIES AND ILLNESSES

					Description of Injury or Illness		Extent of and Outcome of Cases					
								Lost Workday Cases				
									Lost Workdays			
Case or File Number	Date of Injury or Onset of Illness	Employee's Name (First name or initial, middle initial, last name)	Occupation (Enter regular job title, not activity employee was performing when injured or at onset of illness.)	Department (Enter department in which the employee is regularly employed.)	Nature of Injury or Illness and Part(s) of Body Affected (Typical entries for this column might be: Amputation of 1st joint right forefinger; Strain of lower back; Contact dermatitis on both hands; Electrocution—body)	Injury or Illness Code (See codes at bottom of page.)	Deaths (Enter date of death.)	Enter a check if case involved lost workdays.	Enter number of days AWAY FROM WORK due to injury or illness.	Enter number of days of RESTRICTED WORK ACTIVITY due to injury or illness.	Nonfatal Cases Without Lost Workdays (Enter a check if no entry was made in columns 8 or 9 but the case is recordable, as defined above.)	Termination or Permanent Transfer (Enter a check if the entry in columns 9 or 10 represented a termination or permanent transfer.)
(1)	Mo./day/yr. (2)	(3)	(4)	(5)	(6)	(7)	Mo./day/yr. (8)	(9)	(9A)	(9B)	(10)	(11)

Company Name __________
Establishment Name __________
Establishment Address __________

NOTE: This is NOT a report form. Keep it in the establishment for 5 years.

Injury Code
10 All occupational injuries
Illness Codes
21 Occupational skin diseases or disorders
22 Dust diseases of the lungs (pneumoconioses)
23 Respiratory conditions due to toxic agents
24 Poisoning (systemic effects of toxic materials)
25 Disorders due to physical agents (other than toxic materials)
26 Disorders associated with repeated trauma
29 All other occupational illnesses

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The OSHA 100 form, the log of recordable injuries and illnesses, required that the following data items be recorded: (1) date of injury or illness; (2) name of employee; (3) department; (4) nature of illness or injury; (5) illness or injury code; (6) death; (7) lost workdays; (8) days of restricted activity; (9) cases without lost workdays; (10) terminations or permanent transfers.

The OSHA 101 Form (Exhibit 2) Supplementary Record of Occupational Injuries and Illnesses

The OSHA 101 form is a supplementary record of the occupational injuries and illnesses recorded on the OSHA 100 and 102 forms. Form 101 provides a more detailed account on the circumstances of the injury and illness including: the employee's name, sex, age, occupation and department; the activity of the employee at the time of the accident or exposure; the events of the injury or illness; the description of the injury or illness; and the object or substance causing the injury or illness.

The OSHA 102 Form (Exhibit 3) Annual Summary of Occupational Injuries and Illnesses

The OSHA 102 form, the annual summary, contains the following information for each injury and illness category: (1) total cases; (2) total deaths; (3) total lost day cases; (4) cases involving days away from work; (5) number of days away from work; (6) days of restricted work activity; (7) nonfatal cases without lost workdays; (8) terminations or permanent transfers.

The above reports must be kept at each establishment for a minimum of five years. The annual summaries must be prepared no later than February 1st, and posted for at least one month from February 1st to March 1st.

Under a newly promulgated rule, to take effect in September 1978, workers are now guaranteed access to both the log and summary upon request, and may designate in writing that the log and summary be made available

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Exhibit 2

OSHA No. 101
Case or File No. _____

Form approved
OMB No. 44R 1453

Supplementary Record of Occupational Injuries and Illnesses

EMPLOYER

1. Name _____

2. Mail address _____
(No. and street) (City or town) (State)

3. Location, if different from mail address _____

INJURED OR ILL EMPLOYEE

4. Name _____ Social Security No. _____
(First name) (Middle name) (Last name)

5. Home address _____
(No. and street) (City or town) (State)

6. Age _____ 7. Sex: Male_____ Female_____ (Check one)

8. Occupation _____
(Enter regular job title, *not* the specific activity he was performing at time of injury.)

9. Department _____
(Enter name of department or division in which the injured person is regularly employed, even though he may have been temporarily working in another department at the time of injury.)

THE ACCIDENT OR EXPOSURE TO OCCUPATIONAL ILLNESS

10. Place of accident or exposure _____
(No. and street) (City or town) (State)
If accident or exposure occurred on employer's premises, give address of plant or establishment in which it occurred. Do not indicate department or division within the plant or establishment. If accident occurred outside employer's premises at an identifiable address, give that address. If it occurred on a public highway or at any other place which cannot be identified by number and street, please provide place references locating the place of injury as accurately as possible.

11. Was place of accident or exposure on employer's premises? _____ (Yes or No)

12. What was the employee doing when injured? _____
(Be specific. If he was using tools or equipment or handling material, name them and tell what he was doing with them.)

13. How did the accident occur? _____
(Describe fully the events which resulted in the injury or occupational illness. Tell what happened and how it happened. Name any objects or substances involved and tell how they were involved. Give full details on all factors which led or contributed to the accident. Use separate sheet for additional space.)

OCCUPATIONAL INJURY OR OCCUPATIONAL ILLNESS

14. Describe the injury or illness in detail and indicate the part of body affected. _____
(e.g.: amputation of right index finger at second joint; fracture of ribs; lead poisoning; dermatitis of left hand, etc.)

15. Name the object or substance which directly injured the employee. (For example, the machine or thing he struck against or which struck him; the vapor or poison he inhaled or swallowed; the chemical or radiation which irritated his skin; or in cases of strains, hernias, etc., the thing he was lifting, pulling, etc.)

16. Date of injury or initial diagnosis of occupational illness _____
(Date)

17. Did employee die? _____ (Yes or No)

OTHER

18. Name and address of physician _____

19. If hospitalized, name and address of hospital _____

Date of report _____ Prepared by _____
Official position _____

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Exhibit 3

OSHA No. 102

Complete no later than one month after close of calendar year. See back of this form for posting requirements and instructions.

Form Approved
OMB No. 44R 1453

SUMMARY OF OCCUPATIONAL INJURIES AND ILLNESSES FOR CALENDAR YEAR 19__

Use previous edition of this form for summarizing your 1974 cases. This edition is for summarizing your cases for 1975 and subsequent years.

Establishment:
NAME _____
ADDRESS _____

INJURY AND ILLNESS CATEGORY	CODE	TOTAL CASES	DEATHS	LOST WORKDAY CASES				NONFATAL CASES WITHOUT LOST WORKDAYS	TERMINATIONS OR PERMANENT TRANSFERS
				Total Lost Workday Cases	Cases Involving Days Away From Work	Days Away From Work	Days of Restricted Work Activity		
CATEGORY		Number of entries in Col. 7 of the log. (1)	Number of entries in Col. 8 of the log. (2)	Number of checks in Col. 9 of the log. (3)	Number of entries in Col. 9A of the log. (4)	Sum of entries in Col. 9A of the log. (5)	Sum of entries in Col. 9B of the log. (6)	Number of checks in Col. 10 of the log. (7)	Number of checks in Col. 11 of the log. (8)
OCCUPATIONAL INJURIES	10								
OCCUPATIONAL ILLNESSES: Occupational Skin Diseases or Disorders	21								
OCCUPATIONAL ILLNESSES: Dust Diseases of the Lungs	22								
OCCUPATIONAL ILLNESSES: Respiratory Conditions Due to Toxic Agents	23								
OCCUPATIONAL ILLNESSES: Poisoning (Systemic Effects of Toxic Materials)	24								
OCCUPATIONAL ILLNESSES: Disorders Due to Physical Agents	25								
OCCUPATIONAL ILLNESSES: Disorders Associated With Repeated Trauma	26								
OCCUPATIONAL ILLNESSES: All Other Occupational Illnesses	29								
OCCUPATIONAL ILLNESSES: TOTAL—OCCUPATIONAL ILLNESSES (Sum of codes 21 through code 29)	30								
TOTAL—OCCUPATIONAL INJURIES AND ILLNESSES (Sum of code 10 and code 30)	31								

This is NOT a report form. Keep it in the establishment for 5 years.

I certify that this Summary of Occupational Injuries and Illnesses is true and complete, to the best of my knowledge.

Signature _____
Title _____
Date _____

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to a duly authorized representative.

Section 24 of the Act requires that the Secretary of Labor "develop, and maintain an effective program of collection, compilation, and analysis of occupational safety and health statistics."

The major responsibility for this statistical activity has been delegated to the Bureau of Labor Statistics of the Department of Labor. The BLS survey uses the OSHA reporting system in their annual survey of selected employers. BLS compiles and analyzes about 300,000 employer reports (OSHA 200S Form) as its data base for the projection of industry-wide injury and illness rates. BLS organizes their annual injury and illness reports by type of industry, number of employees (size of firm), and region.

There are some significant deficiencies in the OSHA-BLS reporting system. As mentioned earlier, the data does not identify the participating companies. The system relies almost exclusively on employer and employee diagnosis and recording of injuries and illnesses, and therefore cannot be considered an accurate accounting of all occupationally related injuries or illnesses. This is especially true for occupational illnesses that are difficult to ascribe to particular environmental factors in the work place and often have long latency periods between the time of exposure and the onset of the disease. The OSHA-BLS reporting system is considered far more accurate for occupational injuries, especially those of a more severe nature.

Despite the inadequacies of the OSHA-BLS reporting system, CEP believes that collection and analysis of these data on a corporate basis will be a useful enterprise. Although the data cannot be used as a completely accurate measurement of the number injured or made ill by factors in the work place, the CEP study will make available previously unpublished

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U.S. Department of Labor

Bureau of Labor Statistics
Log and Summary of Occupational Injuries and Illnesses

Exhibit 4

for Calendar Year 19____

Form Approved
O.M.B. No. 44R-1453

POST ONLY THIS PORTION OF THE LAST PAGE NO LATER THAN FEBRUARY 1.

14 INJURIES

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data indicating the state of the art for occupational injury and illness recording by these large corporations.

Method

CEP will attempt to compile the OSHA 100, 101 and 102 forms (for 1978, the OSHA 101 and 200 forms will be used) for each establishment owned and operated by the eight companies to determine the nature and causes of the most frequently reported injuries and illnesses.

In addition, the injury and illness information will be organized annually since 1972 to develop corporate injury and illness rates including:

- Incidence of Injury (Frequency)

  Number of reported injuries/1,000,000 hours worked

- Incidence of Illness (Frequency)

  Number of reported illnesses/1,000,000 hours worked

- Severity of Injury

  Average number of lost workdays for an injury
  Total number of lost workdays for all injuries

- Severity of Illness

  Average number of lost workdays for illness
  Total number of lost workdays for all illnesses

Corporate injury and illness rates will be compiled from the data obtained for the individual facilities. These rates will be ordered to rank the corporate experience.

II. Corporate OSHA Compliance, 1972-1978

The second criterion to be used in making assessments of corporate safety and health performance will be corporate compliance with the standards, regulations, and clauses promulgated in accordance with the Occupational Safety and Health Act of 1970.

This compliance profile will be based upon information contained in the inspection case files for all facilities owned and operated by the

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eight companies that have been inspected by the Occupational Safety and Health Administration or by state plans.

Data Base

The data and information base for this part of the study will be the case files for all facilities which have been inspected by OSHA, and which are owned and operated by the eight chemical companies.

Much of the information contained in the OSHA inspection files are transmitted to the Washington, D.C. OSHA headquarters in the new Labor Department building, where it is computerized in the OSHA Office of Management Systems and Data Analysis. This data system is called the Management Information System (MIS).

Information that is retrievable as data from MIS is derived from the OSHA 1 form (Exhibit 5) that is completed by the OSHA compliance officer during the inspection. These data include: (1) the name of the company; (2) the plant(s) inspected; (3) the standard industrial coding for primary process of the inspected plant(s); (4) the type of inspection(s); (5) the total number of inspections resulting in violations for a company in a given year; (6) the date(s) of inspection(s); (7) the type(s) of environmental sampling performed; (8) the health violation(s) as a per cent above the permissible exposure level for toxic substances regulated by OSHA; (9) the type(s) of violation(s) cited; (10) the regulation, standard, rule, order or clause in violation; (11) the penalties cited; (12) abatement periods and requirements; (13) the final disposition(s); (14) the number of job related injuries and illnesses and fatalities for each facility inspected; and (15) the lost workdays due to injuries and illnesses in an inspected facility by year.

This data will be supplemented by information contained in the inspection case files that are not transmitted and computerized in Washington,

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for each company.

The following corporate programs will be discussed:

- Capital Investments for Occupational Safety and Health (engineering controls)
- Workers' Compensation
- Occupational Medicine
- Mental Health Services
- Industrial Hygiene
- Workers' Rights
- Health Insurance Benefits

The information for this chapter of the study will be requested directly of the companies in a questionnaire.

Capital Investments

CEP will attempt to measure the costs for engineering controls employed by the companies since 1972, that can be identified as capital investments for occupational safety and health.

Capital investments for occupational safety and health will be defined as investments for: (1) design modifications that enclose or isolate hazardous processes; (2) new machinery that abates pollutants in the work place (including noise), or that are safer than the replaced machinery; and (3) modifications of machinery in order to reduce exposures.

Workers' Compensation

Information such as the company's experience rating, periodic rating modifications, and premiums and benefits paid will be used in assessing compensable injury and illness experience for each company.

Occupational Medicine

Some determinants in assessing the effectiveness of corporate occupational medicine programs will be the comprehensiveness of the pre-

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but are retained in the area office. This information includes: (1) the number of workers exposed (or at risk) to a violation(s); (2) the gravity assessment of the violation(s); (3) the coded and descriptive evaluations by the compliance officer of the occupational safety and health program of the inspected facility; (4) photographs of the alleged violation(s); (5) drawings or plans of the facility; (6) all correspondence regarding the inspection(s); and (7) the completed OSHA forms used to organize the information obtained during the inspection.

Method

The information contained in the OSHA data base and inspection files will be used to develop a profile of the corporate compliance record since 1972.

Compliance rates will be developed that may include:

- Average gravity assessment for each violation
- Number of violations cited for each year
- The most frequently cited violations
- Number of workers exposed to violations each year
- OSHA penalties paid per violation, and cumulatively each year

The companies will then be ranked according to the results obtained from the ordering of their compliance rates.

III. Corporate Programs

This chapter of the CEP study will be a discussion of the programs employed by the chemical companies to achieve occupational safety and health in their various work places.

Quantification and rating of these programs will be attempted where appropriate and correlated with the results obtained in the previous chapters on the OSHA compliance record and the injury and illness rates

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Exhibit 5

Occupational Safety and Health Administration — U.S. Department of Labor

Safety and Health or Accident Inspection Report

1. Area | 2. Region | 3. CSHO No. | 4. Report No. | 5. CSHO Job Title

6. Inspection Dates — From: Month Day Year — To: Month Day Year | 7. SIC

8. Establishment Name (Print legal name)

9. Site Location

10. City | 11. State | 12. Zip Code | 13. City Code | 14. St. Code | 15. Cnty. Code

16. Name of Controlling Corporation, Partner or Sole Owner | 17. Telephone Number

18. Citation Mailing Address If Different From Above

19. Type of Inspection: Accident ☐ Complaint ☐ General Schedule ☐ Follow-up ☐

20. Special Programs: TIP ☐ THHP ☐ Other Health ☐ Special Emphasis ☐ Other ☐

21. If a previous OSHA inspection has been made in this establishment enter the id of the First OSHA inspection: Region | Area | CSHO Number | Report Number FY/00

22. Check this box if OSHA Training Received by Establishment ☐

23. Number of Employees: Employed in Establishment | Covered by Inspection | Controlled by Employer: 0-19 ☐ 20-99 ☐ Over 99 ☐

24. Advance Notice (Check One): ☐ Given; no adverse effect ☐ Adverse effect (CSHO) ☐ Adverse effect (Employee)

25. Check this box if an employee representative exercised walk around privileges during this inspection ☐

26. Number Safety or Health Hazards Not Covered by a Standard

27. Inspection Status Block: Citations Will Be Issued Yes ☐ No ☐; Date Case Completed Month Day Year; ☐ Abatements Completed; ☐ Penalties Paid; Follow-Up Inspection id: CSHO No | Report No

28. Enter Related Complaint Log Numbers

29. Enter "total-occupational injuries and illnesses" from the OSHA 102

Cal Yr.	Total Cases	Deaths	Lost Workday Cases: Total Lost Workday Cases	Cases Involving Days Away From Work	Days Away From Work	Days of Restricted Work Activity	Nonfatal Cases Without Lost Workdays	Termina-tions or Permanent Transfers

30. Enter cross reference codes if desired for this inspection:

Accident Data

31. OSHA-36 Prelim. Report No. | 32. Date of Accident: Month Day Year | 33. No. Deaths | 34. Hospitalized Injuries | 35. Non-hospitalized Injuries

36. Injured/Deceased

Line No	Name	Disp Code	Nature of Inj	Part of Body	Source of Inj	Event Type	Contr. Envir. Factor	Contr. Human Factor	Task Assn.	Hazardous Substance
01										
02										
03										
04										
05										

37. CSHO's Signature | 38. Area Director's Signature

Area Office

OSHA-1

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employment and periodic medical examinations, particularly the occupational history; recording of known previous exposures to toxic substances for use in determining job suitability; and the quality of emergency facilities and disaster preparedness.

Mental Health Care Services

The proposed CEP study will look into the availability and quality of mental health care for chemical workers. Mental health care is an integral part of occupational safety and health, particularly in the chemical industry where exposures can often produce symptoms affecting consciousness and the nervous system:

> "Workers subjected to the stresses of noise, vibration, solvents, speed-ups or over-bearing supervisors can become occupational casualties just as much as if they inhaled dust or were exposed to toxic chemicals." (5)

Industrial Hygiene

It is essential that corporations provide their employees with comprehensive monitoring of the continuously changing work environment to ascertain risk so that abatement programs can be implemented. The proposed study will describe corporate industrial hygiene programs in the eight companies, as well as industrial hygiene staffing patterns and qualifications. Assessment of corporate industrial hygiene and occupational medicine programs will be based in part on the "Standards, Interpretation, and Audit Criteria for Performance of Occupational Health Programs," developed by the American Industrial Hygiene Association.

Workers' Rights

For the purpose of this study, workers' rights will be broadly defined in two major categories: worker information and worker participation in occupational safety and health.

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A. Worker Information

Chemical production workers are those most vulnerable to the risks of accident or illness due to exposure to chemicals, and, therefore, are in greatest need of accurate and complete information regarding the hazards associated with their work.

Corporate management is responsible for providing this information. This area of corporate responsibility will be closely studied by CEP. The following will be investigated:

- o Availability of Safety and Health Data and Labeling

  The generic name for all chemicals used, processed or manufactured in a facility, the hazardous properties of the chemical, its proper use and handling, emergency first aid in the event of accidental exposure, should all be readily available to workers.

- o Safety and Health Training and Education

  Training and educational programs will be surveyed, particularly to assess the amount of information and skills workers are given to monitor their workplaces for hazards, and their own personal health.

B. Worker Participation

Without an active and informed involvement of workers, occupational safety and health programs will not significantly affect the incidence or severity of injury or disease.

CEP will look into the following areas of worker participation:

- o Risk Assessment. CEP will investigate the manner and degree to which workers are able to participate with management in defining risks to safety and health.

- o Trade Union Activity. An analysis will be performed of the role of the principal trade unions of the industry (Oil, Chemical and Atomic Workers Union, International Chemical Workers Union, and District Unions affiliated with the United Steel Workers International Union, and the United Mine Workers Union), and their effect upon workers' safety and health in the plant.

- o Safety and Health Committees. The performance and effectiveness of safety and health committees will be assessed.

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Health Insurance Benefits

Health benefits plans offered either by the company directly or as part of a jointly administered health plan with a trade union will be analyzed for their comprehensiveness of coverage, cost effectiveness (benefits purchased for each premium dollar), and direct costs to workers in the form of deductibles, co-insurance or contributions for family coverage.

Method

Where data obtained from the eight companies is complete and comparable, the proposed study will develop appropriate rates for a particular corporate program, e.g., number of chemicals for which safety data sheets and complete labels are made available to the work force compared with the total number of chemicals used, processed or manufactured in a particular facility.

These rates will then be organized so that corporate performance can be determined and a ranking obtained.

Composite Ranking for Corporate Effectiveness in Occupational Safety and Health

A composite ranking for corporate effectiveness in occupational safety and health will be attempted. This ranking will be the result of ratings developed for the company's injury and illness experience, OSHA compliance record and rates developed for corporate occupational safety and health programs.

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Work Plan

Task	Duration	Estimated Dates
Data Collection	12 months	October 1978 to October 1979
Data Analysis	3 months	November 1979 to January 1979
Writing	6 months	February 1980 to July 1980
Production	3 months	August 1980 to October 1980

Publication date: November 1980.

Advisory Board

To guide the study and to insure its accuracy and objectiveness, an advisory board will be developed, consisting of people with competence in government, labor, management, as well as chemistry and chemical engineering, toxicology, occupational medicine, industrial hygiene, epidemiology, occupational nursing, environmental health, mental health care, and public interest advocacy. To date the following individuals have agreed to serve as advisors to the proposed study. (Their organizational affiliations and titles are used here for identification purposes only.):

Name	Title and Affiliation
Lawrence J. Ahern	Director, Safety and Health, International Chemical Workers Union, Akron, Ohio
Mary Louise Brown, R.N.	Regional Consultant for Occupational Safety and Health, National Institute for Occupational Safety and Health, New York City
Roy Deitchman	Industrial Hygienist, Bell System Services Group Bell Telephone Laboratories Murray Hill, New Jersey

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Name	Title and Affiliation
Catherine Jenkins, Ph.D.	Dye Chemist, Information Center Director, Art Hazards Project, New York City
Anthony Mazzocchi	Vice President, Oil, Chemical and Atomic Workers International Union, Denver, Colorado
Michael McCann, Ph.D.	Director, Center for Occupational Hazards, Inc., New York City
Ann Dore McLaughlin	Public Policy Counselor, Partner, McLaughlin & Company, Washington, D.C.
Irving Selikoff, M.D.	Director, Environmental Sciences Laboratory, Mount Sinai School of Medicine, New York City
Jeanne Stellman, Ph.D.	Chief, Division of Occupational Health and Toxicology, American Health Foundation, New York City
Peter Van Schaick, Esq.	United States Department of Labor, Regional Solicitor's Office, New York City

Additional advisors have been invited to participate in the project and are expected to be added to the board after they have had an opportunity to review the proposal and have agreed to serve.

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Biography of Project Director

The proposed study of the chemical industry will be directed by Matt Meyers.

Mr. Meyers received his Bachelor of Arts degree from Princeton University in 1970, where he majored at the Woodrow Wilson School for Public and International Affairs.

He earned his Master's degree in Public Health from the Columbia University School of Public Health, majoring in Environmental Health Sciences with a specialty in Occupational Safety and Health.

Mr. Meyers has worked as Assistant Administrator of the Local 259 United Automobile Workers Union (U.A.W.) Health and Pension Funds, where he helped establish an occupational safety and health program, and was editor of the local union newspaper. He has also served as Field Representative of the Textile Workers Union Health Plan.

His written works include: "Coke Oven Emissions and Occupational Exposures to Benzo(a)pyrene," "The Joint Board of Sanitary Control: Occupational Health in the Women's Garment Industry, 1910-1926," and Where There's Smoke, a photographic essay on industrial workers and their occupational environments.

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Budget

CEP Occupational Safety and Health
Study of the Chemical Industry
(Two year project)

Staff salaries and benefits	Amount
Research Staff	
Project Director	$40,000
Research Associate	$35,000
Consultants	$ 5,000
Student Interns	$ 5,200
Secretary/typist	$20,000
Executive staff support	$14,400
Administrative staff support	$12,000
Benefits (11% of above), excluding consultants and interns	$13,574
SUBTOTAL	$145,174
Professional Services - Audit, Legal, P.R.	$3,000
Administrative and office expenses	
Telephone	$ 6,000
Rent	$ 4,000
Utilities, maintenance	$ 1,600
Postage, general usage	$ 3,000
Equipment	$ 1,800
Office supplies, printing	$ 3,500
Data processing	$ 2,000
Library	$ 1,400
Travel	$ 6,000
Miscellaneous	$ 1,000
SUBTOTAL	$ 30,300
Publishing	
Newsletter summaries (2)	$ 1,800
Study or reports	$10,000
Promotion (direct mail)	$ 500
Press, information dissemination	$ 1,000
SUBTOTAL	$ 13,300
Reserve for contingencies (10%)	$ 19,177
TOTAL	$212,951

*Yearly total budget: $106,475

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W.R. Grace & Co.

Monsanto Company

Union Carbide Corporation

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