D R A F T

PLAINTIFF'S EXHIBIT
UC-2825

METALS DIVISION

To (Name) Mr. F. H. Larrison
Division Metals
Location King City, California

Date October , 1975

Originating Dept. Safety

Answering letter date

Copy to Messrs. J. F. Emerson
R. E. Hayes
R. J. Kronkhyte
W. C. Thurber

Subject Safety Audit - King City Operation October 15-16, 1975

Dear Larry:

This audit was directed primarily at evaluation of key situations with a supplemental review of the total program plus personal contacts with a sampling of the workers. The key situations are well controlled in your operation with a minimum of recommendations noted. These will become the basis of an action plan approach as part of the 1976 Safety Program (if not accommodated sooner).

Key Situations, recommendations

1. Falls - our minimum standards are met. Slippery floors continue to be a problem but acid etching, roughened concrete and non-skid surfaces are being expanded throughout the mill.

2. Mobile Equipment - Equipment inspection and our minimum standards are met except some training and lights standards.

   Recommendation - a) Develop a training outline or syllabus for use by supervisor or trainer for each type of equipment. This will provide assurance that all necessary components are covered irrespective of who may do the training.

   b) Review use of equipment in night operation and provide forward/reverse lights for all night used equipment.

Electrical - Only recommendation is; established annual visual check of grounding equipment and follow up with instrument testing if indicated.

Note: Piersall will review jog switch vs single starting point and advise you later regarding applicability.

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ACL Doc 17691 · Page 1 of 3 asbestosclaims.law/library/17691/1

Moving Machinery - OK

Lifting Equipment - Only non-powered lifting equipment is provided. Recomendation - provide written instruction specifying what and how employees are to inspect before use on a daily basis (monthly inspection is adequate).

Gas and Volatiles - Recommendation: Although the propane storage and use area is signed as a safe work permit area it is not clear just what equipment and/or situations require permits. This should be specified.

Confined Spaces - The only minimum standards not accommodated pertain to use of gases. Recommendation; establish (in writing) requirements that a) gas cylinders not be taken into confined spaces, and b) oxygen/acetylene hoses be tested for leakage before being taken into confined spaces.

Rolling Stock (RR) - Recommendation; mark all car parking locations where "cornerning" situations could occur to assure adequate safety zone.

Chemicals - OK

Pressure Vessels - Recommendation: a) Establish inspection procedure for small air receivers, etc., not covered by Travellers Insurance Company, b) Establish test procedure for pop-off valves to assure they operate at proper pressure.

Note: Piersall will provide general information but California codes should be checked to determine state requirements if any.

Other Audit Comments

1. All recommendations on last years audit have been done or are underway.

2. Personnel contact reestablished a continuing recognition and appreciation by the employees of a well balanced and effective safety and health program. A few comments were made that merit consideration for action including:

   a) Occassional joint maintenance/operation safety meetings.

   b) Introduce new employees throughout the plant so others can feel comfortable in contacting them.

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ACL Doc 17691 · Page 2 of 3 asbestosclaims.law/library/17691/2

c) Relocate welding bottles currently in the maintenance shop to alleviate crowding and proximity to flame source.

d) Be more firm in rule enforcement (i.e. no exceptions permitted).

e) Get more discussion in safety meeting. People like the increased use of films but feel there is room for more 2-way communication.

f) Consider a special safety suggestion program.

g) Minimize length of ladder to live bottom bin.

h) Continue and extend efforts to control slippery floor conditions.

Inspection Items

1. Dock board at RR car was not latched. This should be reemphasized periodically and checked daily by the supervisor.

2. Gasoline can should not be stored in tool shed (confined area).

3. Time delay on conveyor pre-start alarm is only 5 seconds. This should be extended to give persons more time to recognize signal and move to a clear position if necessary.

4. Several electrical conduit connections were broken in the area of the RG244 Reis mill.

We appreciate the preparation made for this audit and the excellent cooperation given us by all personnel.

R. E. Hayes

E. A. Piersall

W. C. Thurber

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ACL Doc 17691 · Page 3 of 3 asbestosclaims.law/library/17691/3