PLAINTIFF'S EXHIBIT

UC-2836

UC 1.13-2

INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION

P. O. BOX 1949, GRAND JUNCTION, COLORADO 81501

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

Date November 4, 1974

Originating Dept. Safety

Answering letter date

Copy to Messrs. J. F. Emerson
R. J. Kronkhyte
W. C. Thurber
H. F. Reichard

Subject Management Safety Audit - King City October 16, 17, 1974

Dear Larry:

The audit team was most impressed with the good safety work that had been done since the last audit ten months ago. Most of the recommendations made in 1973 have been augmented. The safety record is without blemish this year and in our interviews of personnel we were most pleased with the attitude displayed throughout the entire organization. Furthermore the plant was in as good appearance housekeeping and safetywise as we have ever seen it. We were particularly impressed with the improvement in the maintenance area appearance.

We will review the points on last year's audit following the same numbering system used previously as follows:

I.A.1. Plant safety policy. This has been revised, has been posted and reviewed with all supervisors. All that remains to be done is have it signed by the manager and included in the forthcoming safety rule book.

I.C.1. Central Steering Committee. This committee is functioning, meeting approximately every two months. Records are kept. Although it may not appear to be significantly different from the informal system previously used, the audit team believes the more formalized approach has definite advantages in assuring that the work gets done, action is taken, people are properly informed, etc. It certainly is of value to the Divisional Safety Director in keeping abreast of action at the plant.

I.D.1. Annual safety program. The annual program has been developed including suggested changes from last year and appears to be serving its purpose very well. The only question noted was in one or two discussions the supervisors indicated they would like a little more help in planning, and preparing their monthly safety meetings and there was a general feeling that a few more safety films would be welcomed in the safety meeting application.

I.D.3. Program communication. The recommendation that the asbestos health information be distributed has been accomplished and via two special approaches this year re-enforced by management's presentations, apparently with excellent results on the part of those attending the program.

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I.E.1.a. New employee training. Last year's recommendations regarding establishing a safety shoe stock has been accomplished. The only related recommendation is to raise the shoe allowance to cover the average cost of a pair of shoes. The other recommendation from last year was to establish a testing of safety knowledge before probationary period ends. Tests have been developed and will be implemented into the program in the immediate future.

I.E.3. Personal contacts. This has been given special attention and appears to be going well; however, interviews would indicate that personal contacts are largely corrective or instructional. Our only suggestion is that the supervisors expand contacts to generate open exchange of safety ideas and develop a two-way communication potential to the maximum.

I.E.2.e. Safety meetings. These appear to be doing well except as noted above in I.D.1. We were particularly impressed with the development of the reporting form which includes safety meeting information, personal contacts and supervisor observation reporting for each crew.

I.E.4. Job observation. This program has been reemphasized and appears to be going successfully. A review of the minutes and a discussion with the individuals would indicate that contacts are being made; however, there seemed to be an indication that supervisors may not follow up an observation with a contact unless there is some deficiency in the contact. They should be guided to assure that they do have a contact to review the job procedure with the employee after each observation.

I.F.5. Safety rules. The rules have been reviewed and revised and are ready for printing. Hopefully this will be accomplished in the immediate future. Following printing, reissue and rediscussion with all employees is planned.

I.J.1. Job safety analysis. We were pleased to find that each supervisor had been assigned specific job safety analysis to work on during the balance of 1974 and that this work is being done with the exception of the maintenance area. Maintenance is where it needs to be stressed the most. One general suggestion is that the supervisors involve as many hourly employees as possible in the review of the job procedure before the JSA is finalized.

I.J.6. Major hazard survey. A review of the major hazards has been done and defined in writing. This will serve as a basis for the UCC major hazard survey form should it be called for sometime in the future. The problems are known; only the format remains to be followed if and when necessary.

I.K.3.b. Medical. Improved medical relationship has been developed primarily through Dr. Welsh's visitation with the local clinic.

I.L.1. Safety suggestion. The normal way that safety suggestions are encouraged is through personal contacts and job observations. It may be desirable to conduct a special safety contest sometime in the future.

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I.N.3. Disciplinary policy. This has now been written and reviewed with all supervisors.

I.P.1. Driver's certification. Drivers license numbers have been obtained and the new Clark Company's training program is being reviewed for initiation in our forklift training. Pertinent parts of this should be considered for other types of mobile equipment such as front end loaders, etc., and the proper syllabus covering various types of mobile equipment developed therefrom.

I.Q. Off-the-job program. Although this program was not mentioned in last year's audit recent Corporate emphasis on off-the-job accident records and concerns have provided encouragement to stimulate off-the-job safety wherever possible. Of particular importance to the Corporation is emphasis on traffic safety such as defensive driving training, etc.

II.C.2.a. Dust control. Significant progress has been made in dust control through new and improved facilities and increased sampling techniques.

II.C.2.c. Noise. No engineering study has occurred since the last audit. An initial step will be to provide King City with the noise exposiometer (mailed 10-21-74). This will permit personal monitoring to determine full shift noise exposure level estimates on the individual jobs. Following this it will be easier to determine which areas may need engineering efforts directed toward them.

II.C.3. Noise standards. Apparently I erred in believing that the noise standards in California were lower than OSHA. If we meet the 90 decibel 8-hour standard (until OSHA standards are changed) this should be adequate.

III.A.1.a. Hazardous materials. Barricading and separating of hazardous material tanks, etc., has been accomplished.

III.C.5. Condition of buildings. Certain recognized hazards still remain including steep stairs, slippery floors and minimum space for movement in some locations. Slippery floors continue to be a problem that concerns many people and maximum utilization of roll roofing for other anti-slip material is essential along with frequent cleaning, etc.

III.E. Fire water reserve. Though not covered in last year's audit report it was discussed. We feel that the bottom of the fire water tank should be converted into a reserve for fire water only with proper valving controls, etc.

IV.A.2. Safe work procedures. The use of safe work permits has been defined in a list and included in the new safety rules forthcoming soon.

IV.E.9. Tools and equipment. Inspection of hand tools is not yet accomplished; however a list for inspection has been developed.

V.A. Order and housekeeping. The general housekeeping of the mill was excellent. The maintenance are was greatly improved over the past as was the bagging palletizing area.

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V.E. The most outstanding feature. Again, this was difficult but we felt the general attitude of all people we talked to showed nothing but strong support and appreciation for the safety program and we were greatly influenced by this reaction.

In summary, most of last year's items have been accomplished or are in the process of being accomplished. Physical conditions are much improved, areas of some concern outside of those covered in the audit questionnaire are basically oriented toward the asbestos dust problem. As a correlary action in connection with the audit a review was made of the dust sampling program with Dr. Welsh and Paul McDaniel; the audit team, and plant management group. Out of this discussion came the general agreement that the mill will be reviewed and put into approximately seven categories with monthly sampling including every month the bagging/palletizer area and three of the other categories. Operators in those groups will be given personal monitor sampling approximately 8 one-half hour samples during the course of a shift. This will provide meaningful information for estimates of full shift exposure. In conjunction with this will be, at least on a 6-month basis, area samples made of the other portions of the mill not covered by the personal monitors in the approximate seven critical areas. After this information has been developed for approximately six months a review will be made to ascertain what changes may be needed and to determine how we can best computerize this information so that we can readily have available individual exposure time weighted averages for all personnel.

In addition Dr. Welsh has asked for a mortality study on all King City employees with more than one year of service going back to plant start up and continuing in the future.

The audit team was most appreciative of the cooperation extended to all visitors and again let us congratulate you on the outstanding improvement achieved in the King City plant from the safety viewpoint last year.

E. A. Piersall

H. F. Reichard

W. C. Thurber

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