PLAINTIFF'S EXHIBIT

UC-3350

UNION CARBIDE

INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION

P. O. BOX 1049, GRAND JUNCTION, COLORADO 81501

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

Date January 29, 1974

Originating Dept. Safety

Answering letter date

Subject Management Safety Audit
King City 12-10-73

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

Dear Larry:

The audit team appreciated the effort done by you and your staff in developing all the audit material and aiding us in reviewing this information as it related to your operation. Unfortunately the King City operation's safety record was marred in 1973 by one disability and another serious injury. The proposed plant expansion will add to the work force increasing the difficulty in assuring maximum safety knowledge and application on the part of all people; it will require greater effort. We feel that the basic program as outlined, plus the modifications as referred to in this report, should do a good job of preventing injuries and illnesses at your location. We are pleased to note that subsequent to the audit and prior to this report you have already accomodated a number of things that were discussed during the audit.

Following comments represent the consensus opinion of the audit team. The numbering system is the one that is used in the audit outline. Only items involving some recommendation or comment are listed.

I.A.1. Plant safety policy. This has been written and is used in the annual program. We have two suggestions; one, that it be signed by the manager to personalize this document with his own commitment and secondly, that the safety philosophy expressed in the UCC policy and reflected in John Emerson's charter be incorporated.

I.C.1. Central Steering Committee. The function of the Steering Committee has been performed on an informal and unscheduled basis; however, we feel the Safety Committee is so important that it should be formalized with regular meetings using a defined agenda and with follow-up reporting to comply with Divisional policy. It is noted that this has been started in the month of December.

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I.D.1. Annual safety program. The 1974 program outline was included in the audit material. We ask that two things be added; 1) the personal contact program be more clearly defined in the program schedule and, 2) that supervisory responsibility for various safety meetings be established and defined in the program.

I.D.3. Program communications. It was suggested that asbestos health information be distributed as part of the annual program. Mr. Thurber will follow up and get approved material for distribution.

I.E.1.a. New employee training. 1) We noted that employees may work for extended periods of time before safety shoes are available. Therefore it is recommended that a small stock of a basic type shoe be on hand for sale to the employees immediately upon hiring. 2) We also noted that there is no current procedure for testing or assuring that new employees fully understand the safety requirements before their probationary period ends. Some such review can be used effectively.

I.E.3. Personal contacts. An informal, unrecorded system of contacts exists. Reportedly it is directed primarily at giving employees tips or brief instructions on how to do specific job functions. The 1974 M & M safety program asks that special emphasis be given to depthful safety contacts directed toward 2-way communication, recorded information relayed to management regarding employee suggestions or concerns and response back to employees describing action to accomodate their suggestions.

I.E.2.e. Safety meetings. These are reported on a form; however, it does not serve as a feedback report, only a verification. Feedback information to management should be incorporated in this report.

I.E.4. Job observation. This program was in effect but currently is not being utilized. We suggest that it could be structured to be used in conjunction with other activities so that it does not phase out of existance and that the benefits accruing from job observation are gained periodically.

I.F.5. Safety rules. The current safety rules have been in existance for four years and it is time for them to be revised and reissued. When reissued in printed form they can be the basis for a very effective review of all rules and techniques both through safety meetings and personal contacts.

I.J.1. Job safety analysis. This program is in effect and all circuit operational jobs are covered; however, maintenance jobs have not been accomplished. A list should be defined establishing the priority of what is to be done and how and personnel assigned to a long term project of developing JSA's on those jobs that are so described. To achieve maximum use potential the JSA write-ups should be placed in the operating manuals.



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I.J.6. Major hazard survey. A new major hazard survey must be conducted in the forthcoming year. I will obtain a copy of the UCC major hazard survey outline and send it to you.

I.K.3.b. Medical. We have had problems getting in contact with the local doctors to get personal knowledge of condition of people hurt in accidents and to express our needs in light of work and work restrictions. I will contact Dr. Welch and see if he can arrange a visit with the medical clinic in King City to try to clarify our position in this matter.

I.L.1. Safety suggestions. No formal program exists although shifters are in close contact with men and credit is given for suggestions when they are formally received. We suggest that although you may not need a formal suggestion program every effort should be made to stimulate employees to give suggestions and to assure that they are well received a positive feedback arrangement is functional.

I.N.3. Discipline policy. The disciplinary policy is not in writing. Although there is general understanding in supervisory levels a written policy will help clarify and consolidate this important procedure and should therefore be provided.

I.P.1. Driver certification. 1) Although certification lists exists for operators of each type of equipment no record is made of driver's licenses. This is something you might wish to consider, especially for those who may have need to leave the plant area in company vehicles. 2) The training of drivers of mobile equipment does not have a formalized plan which can be followed. A written program or syllabus is desirable to assure that all points are covered with new drivers no matter who may be called upon to do the training.

II.C.2.a. Dust control. Excellent progress has been made to date in controlling exposure to asbestos dust. TLV will be reduced in two years and even greater emphasis will be placed on control.

II.C.2.c. Noise. Some progress has been made in reducing noise levels in the plant. We suggest scheduling an engineering study at a convenient time to ascertain what additional controls may be feasible from the engineering viewpoint.

II.C.3. Noise standards. The state industrial standard for noise in California is lower than other states. This should be checked to ascertain where the plant stands in relationship to California requirements. I believe this is in the Industrial Safety Orders.



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III.A.1.a. Hazardous materials. Gas, propane and diesel are stored close together. The supply line for natural gas is not adequately protected and the barricade between the propane tanks and vehicle runway is not satisfactory. This area should be considered for a safe work permit requirement.

III.C.5. Condition of buildings. Steep stairs and slippery floors are two problems. Slip resistant material such as the rolled roofing could be extended on slippery floors and stick-on treads may be possible on some of the stairways to minimize slipping.

IV.A.2. Safe work procedures. We suggest that those jobs that require Safe Work Permits or procedures be defined in the forthcoming edition of the rule book as well as being posted to assure that all personnel fully understand what they are.

IV.E.9. Tools and equipment. The maintenance supervisor is expected to check hand tools, etc., but this should be scheduled on a periodic basis.

V.A. Order and housekeeping. The rating of fair to good is given overall and housekeeping in some parts of the mill was excellent but in other areas particularly in maintenance and vehicle storage areas it was not up to our standard.

V.E. Most outstanding feature of the program. The overall safety program is well documented as supported by the material given the audit team. In some ways you are way ahead of the pack. You have defined a disaster plan, you have an effective release procedure which appears to be functioning properly. There is an established list of chemicals and related hazards and the inspection procedures are well established. Other points noted were excellent organization in the handling and storage of product. There appeared to be a high level of interest and concern by the hourly people for their safety as it relates to the operation. The supervisors appeared consciencious and concerned regarding their safety responsibilities.

C. Areas most in need of improvement. Most of the items reported in the audit dealt with improvements or less than vital concerns; however, such things as separation of fuel supplies and a review of other major hazard potential are probably the things needing most priority.

In summary it appeared that most of the more important safety requirements have been accomodated. A number of items listed herein when employed should add strength to the total safety picture at King City. We appreciate the efforts of all concerned in helping us better understand the safety organization. Items noted on the plant tour are listed on a separate page.

E.A. Piersall by bss

E.A. Piersall



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MANAGEMENT SAFETY AUDIT

Items noted on inspection of King City operations 12-10-73:

1. Housekeeping in the shop was poor.
2. Eyewashers in the shop should be equipped with two nozzles so that each eye can be washed simultaneously.
3. Electric shop, a pad was needed under the switches to provide proper insullation. Also the switch panels were partially blocked with stored equipment.
4. Ground fault interupters are provided but there is no local policies on when and how they should be used. This should be defined in writing.
5. Oxygen and acetylene bottle storage lacked the proper separators to keep the bottles apart.
6. Flashing lights on forklift trucks were inoperable in two instances.
7. Some of the forklift trucks lacked the proper interrupter switch on the seat or other deadman device to preclude activation from the ground.
8. The trackmobile light was not functioning.
9. Several instances of long hair were noted. Our new long hair policy will need to be applied with a few individuals.
10. Oxygen bottle was not secured adjacent to the dryer where maintenance work was underway.
11. We suggest that the ground fault interupter be prescribed on the entry permit form for those jobs where it should be used.
12. Better guard is needed around the propane tanks.
13. To insure that necessary warning lights are functional on mobile equipment a special inspection process should be established.
14. The housekeeping in the "air" building was poor in part. This involves approximately $60,000 inventory and housekeeping is our primary fire prevention method.
15. The entry of the metro gas line into property lacked proper protection of the piping and valve arrangement.
16. Landings to the vertical ladderway to the roof of the dryer area should have self closing gates.
17. Several drives underneath the presses should be equipped with guards.



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