

FOSECO, INC.



INTER-COMPANY AND INTER-DEPARTMENTAL CORRESPONDENCE

TO: All Cleveland Plant Personnel

FROM: M. S. Wood
Plant Manager

DATE: November 9, 1973

SUBJECT: Personal Protective
Equipment

The Occupational Safety and Health Act (OSHA) was enacted by Congress December 29, 1970. It's purpose is to assure as far as possible safe and healthful working conditions. OSHA can be considered the minimum standard for virtually every business in the United States.

The Occupational Safety and Health Act requires "Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact."

To insure compliance with the above standards and to make the Cleveland facility a safer place to work, the following procedures will apply to all plant personnel. Your cooperation is mandatory!

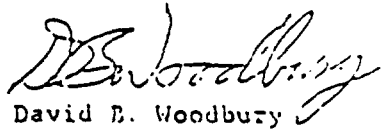
1. Hard hats are required throughout Cleveland manufacturing facilities.
Exceptions.....in cases where employees remain in a given work place and there are no recognizable hazards or hazardous activities in the vicinity. Employees leaving designated areas and general movement throughout the plant require hard hats.
2. Approved safety glasses are required in all departments at all times.
3. Safety shoes will be required in all departments at all times.
4. Respirators will be used at all times on pulping platforms, exothermic and flux material blend platforms, and bagging operations.
5. Earplugs will be used as required.

The objective of the Foseco safety program is to strive constantly to achieve a higher level of safety in all areas of the plant. This requires that all employees fully recognize and carry out their responsibility for their own safety and the safety of others. It goes without saying that safety on the job is not just the law - it's good sense.

FORBES, INC.

INTER-COMPANY AND INTER-DEPARTMENTAL CORRESPONDENCE

TO: ALL EMPLOYEES

FROM: David B. Woodbury 

DATE: Nov. 28, 1973

SUBJECT: Personal Protective
Equipment

As I'm sure you're aware, we have recently been visited by OSHA Compliance offices on two occasions. They have made it clear to us that the Company is responsible for enforcing it's Personal Protective Equipment program. They have also made it clear to us that employee compliance is required by Federal Law.

I am pleased by recent observation that many of you realize the importance of the protection provided by safety shoes, hard hats, safety glasses, and respirators. By wearing this equipment faithfully, you are guarding against the possibility of serious injury and loss of wages. Anyone who has suffered the pain of a broken bone or the loss of an eye can fully appreciate that the risks of not wearing personal protective equipment are foolish.

Beginning Dec. 1, 1973 employees who fail to wear their required personal protective equipment will be disciplined. Should discipline fail to impress upon employees the need for compliance, discharge may result. If you have any questions regarding your obligations of this program, see your supervisor immediately.

Let's everyone encourage the wearing of personal protective equipment. After all, those who don't wear safety equipment hurt themselves.

FOSECO, INC.

INTER-COMPANY AND INTER-DEPARTMENTAL CORRESPONDENCE

TO: ALL SUPERVISORS

FROM: David Woodbury
Mike Wood

cc: J. Ricketts
D. Lecian
J. Mohr

DATE: Nov. 28, 1973

SUBJECT: Personal Protective
Equipment

Enclosed is a copy of the memo that was attached to everyone's paycheck this week. We have been patient long enough in attempting to fulfil our requirement under OSHA. The increased participation in this program of education and enforcement is visible. You are to be complimented with an improvement in compliance on all three shifts.

Beginning Dec. 1, 1973 employees who have failed to respond to your urging will be given progressive discipline in an attempt to change their behavior to that of compliance with the Personal Protective Equipment program. That progressive discipline will be as follows:

1. Non-compliance after Dec. 1, 1973 - a written reprimand and the option of either attending a one hour safety lecture scheduled by the Company on their own time or a one day suspension without pay.
2. Next offense - a written reprimand and a three day suspension without pay.
3. Next offense - a written reprimand and a five day suspension without pay.
4. Next offense - discharge.

A suggested sample copy of the first written reprimand is attached. Modifications of this can be used for necessary future disciplinary action. Just a reminder that supervision has an obligation to offer and provide union representation regarding disciplinary action.

R. Swanson and J. Joyce have been appointed as responsible individuals to insure that all outside contractors conform to Foseco's safety rules and regulations including the requirement that all employees and individuals working in the factory wear personal protective equipment.

If you have any questions on the foregoing or any aspects of the program do not hesitate to contact me or Greg Thomas.

EMPLOYEE REPRIMAND NOTICE

S A M P L E

Name _____ Clock Number _____

Department _____ Date of Occurance _____

Nature of Violation After having been repeatedly advised of your obligations to wear personal protective equipment, you were observed on the above date performing your job without your . . . In so doing you not only violated Company safety rules but you also ran the risk of serious injury to yourself.

Since you are aware that the wearing of personal protective equipment is a condition of employment at Esceco, you are hereby suspended for one day without pay. This suspension will be set aside by your attendance at a Company safety lecture on your own time which you have volunteered to do. The Personnel Dept. will inform you where and when to report. (Employees who do not volunteer to attend the safety lecture will have the previous two sentences stricken from their write-up.)

Your immediate compliance with the wearing of personal protective equipment is necessary if you are to avoid more severe disciplinary action.

(Date)

(Supervisor's Signature)

Original: Personnel File
Copy to: Employee
Union