

CertainTeed	Date December 18, 1978	To Mr. W. W. Mertens	Location and mail code E. St. Louis #01
Subject PLANT VISIT - OCTOBER 2, 1978 O. Kittilstad and L. DiMaria	From <i>L. DiMaria</i> L. DiMaria/dav	Location and mail code VF CORP #4	

cc: S. E. Monoky - VF SMG #8

This will confirm our above captioned visit to your facility. We thank you for the courtesies extended us and apologize for the lag in time between the visit and this communication. We shall attempt to highlight the discussion we had regarding you local Safety Program.

Management Involvement

This aspect of a local Safety Program is absolutely essential if any program is to be successful. At the time of our visit, there really was not (in your opinion) a formal Safety & Health Program in existence at your facility.

With this thought in mind, you as Plant Manager must exercise and demonstrate leadership in having formulated for your facility a documented local Safety Program. You will want to assure that all responsibilities delegated by the Program are carried out at a high level of performance. It will mean that you will have to use your authority to assure that your staff is convinced that you have assigned safe operation a high priority and that unsafe operations are unacceptable.

The first line supervisors must be convinced that they are directly responsible for safe operations in their respective areas. They must be able to recognize this responsibility and accept it just as they do the other production aspects of their duties.

Your plant staff personnel such as Maintenance Foreman, Personnel/Office Manager and others should all be delegated specific responsibilities under various portions of your formulated local Safety Program.

The above limited concepts are based on the fact that all local management must be coordinated in a team effort under your direct leadership. The idea that the entire safety problem is delegated to a single person is to be absolutely avoided as such an approach tends to indicate that safe operations is a side issue and not related to the mainstream of local activity.

Management involvement in a local Safety Program is not to be construed as an add-on. It is an inseparable part of overall management efficiency and the formal Safety Program adopted at East St. Louis should reflect this philosophy.

PLAINTIFF'S EXHIBIT

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Program Visibility

By program visibility we refer to the view of the local Safety Program by the work force. A highly visible, formulated program will make every member of the plant population keenly aware of local management's insistence upon and involvement in safe operations. Since there is no formal program at present, the visibility factor is low and the positive motivation and improved safety attitude associated with it are not at the level they could be.

This does not mean that there is no visibility at your location since the local "Safety Committee" and the new hire handbook do give some visibility. What we are suggesting is the continual type of visibility that is present with an ongoing formal program involving all of the people at your facility.

Accident Investigation

The existing accident investigation procedure, as you explained, involves Jack Stewart working along with Tom Schaffer on his periodic visits to your facility. Again, there did not seem to be any documented formal procedure that you were aware of nor did there seem to be available any meaningful loss analysis to identify what type of basic causes may be responsible for the roughly one-third of your plant force being involved in a Workmen's Compensation claim annually.

It appears that the thrust of the existing informal procedure at your facility does not place the responsibility for accident investigation policy on the injured employees immediate supervisor and this is a concept that we agree with. We concur with this idea because making the front line supervisor solely responsible for accident investigation usually results in a self serving defensive exercise, especially when the supervisors own shortcomings plays a part in the basic cause of an accident.

However, since J. Stewart's visits are only on an average of once per month this means that many times too long a delay will occur between the accident and the investigation under the present system. We would therefore suggest that a plant staff member be assigned to work with the appropriate first line supervisor on all investigations as soon as possible after an incident occurs.

This should also be augmented by good analysis on both an individual case by case basis as well as on an overall basis to determine trending and pertinent data that is essential in controlling losses within the organization.

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You as Plant Manager, must demonstrate a sincere interest in all accident investigation efforts and reports. You should carefully review and sign off on all such reports and reject them when they are ill prepared and lacking in content.

Physical Hazards Elimination (Self Inspection)

At present there is a form of self inspection conducted at your facility which is usually made a part of the periodic committee meetings referred to earlier. Again this is a very informal system.

We would suggest that a formalized procedure be drawn up to incorporate a self inspection system on a monthly basis at your facility. The inspection could involve hourly workers, supervisors, staff specialists and even yourself. They should be integrated with safety committee activity and should always be documented in writing and meticulously followed up.

Employee Selection & Assignment

According to our discussion, there is a very low rate of turnover, somewhere in the area of three or four percent per year. Therefore a very stable workforce situation exists and very little new hiring takes place.

A good local Safety Program must develop an employment procedure that will select the best available trainable people who are capable of receiving and following directions and are physically capable of performing their assigned duties.

This means a high quality recruitment effort that involves verification of previous employment (with emphasis on absenteeism, work related injury experience and overall work habits). Selecting highly motivated and healthy employees capable of performing their duties in a safe efficient manner is a good start for your operation.

We only reviewed one file of a new hire, and that was the most recently hired person who had started approximately a month before our visit. This person's file did not reflect any verification or any of the documentation you felt existed for new hires. We therefore suggest that the hiring procedure be reviewed and formalized.

Employee Indoctrination and Training

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There is in existence a check sheet and employee handout combination

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which is used for indoctrination and training purposes for new hires. However, in the case of the new hire cited above, no such documentation existed.

Again we would recommend that you review this procedure and formalize it. An acceptable program must require that training be started as soon as the new employee steps onto the premises and must detail the indoctrination to explain the duties fully as well as an explanation of the local Safety Program.

The procedure should not stop with the employee's initial assignments but should make provisions for adequate training whenever reassignments occur. In addition, there should be provisions for continuing education on safe operation accomplished by supervisory contact, group discussions, periodic training films, posters, handouts and other methods.

The Safety Training conducted should not be considered a special type of training but be integrated into overall job training. All safety related training should be documented and made a part of the employees personnel record.

Regulations & Procedures

The previously mentioned company pamphlet issued to new hires contains "Company Rules" and are quite general in nature.

While touring the plant we did not note the existence of any posted Regulations & Procedures. It may be very worthwhile to develop and post specific regulations and procedures throughout the plant.

They should be clearly defined, practical and enforceable "Do and Don't" rules addressing areas requiring attention.

Personal Protective Equipment

The Safety & Health Checklist on the aforementioned handout makes reference to safety shoes and glasses. There is not, however, a formal procedure on these articles of personal protective equipment.

We would suggest a review of the hazards present within your operations and a determination made as to what are the total protective equipment needs. Based on these needs, a procedure should be developed on each requirement specifying such things as types of approved equipment, issuance, cleaning, inspection, repair, replacement and other pertinent considerations.

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Workmens Compensation Management

Any existing Workmen's Compensation control activities would be handled by T. Schaffer and J. Stewart. However, there has seldom been much in the way of communication between your operation and Aetna Insurance in the past. Since Fred S. James has become involved in the adjustment of your Workmen's Compensation activities you felt there had been some improvement.

Adequate claims management starts with adequate Medical management of the case by competent physicians who are familiar with your operations and include someone designated on your staff who will work in close cooperation with the claims adjustment agency and the treating physician.

The staff member functioning in such a capacity will become involved in initial claims processing, monitoring of claims and their estimates, and record keeping activities. We would be glad to supply you with an outline of the duties involved should you so desire.

Performance Measurement & Goals

Aside from the group sponsored Safety contest with monthly published performance rates, there is no locally developed goal and performance measurement system. Ideally this activity should be developed locally whereby annual plant safety performance goals can be assigned to individual departments and foremen. The performance measurement could then be used during the annual appraisal and tied into the merit increase system.

We know that the content or format of the above material may be new to you so we ask that if you have any questions at all, please contact us. If we can be of further assistance to you, please do not hesitate to ask.

CTD017602

RE: EAST ST. LOUIS VISIT - OCTOBER 2, 1978

On October 2, 1978, we visited Wayne Mertens, Plant Manager, of the East St. Louis SMC facility. Accompanied by R. Taylor and O. Kittilstad, we conducted a walk-through tour of the facility, as well as spending a good deal of time in Wayne's office discussing local activities as they related to the Health & Safety functions within his operations.

The felt operation conducted here consists of a seven days per week, three shifts per day schedule where approximately 77 people are employed. The bulk of the Health & Safety responsibilities have been placed locally with Tom Schaffer, the office manager. In addition, Jack Stewart the Safety Manager from the Kansas City facility visits East St. Louis approximately once a month and principally deals with Tom Schaffer on Safety matters.

A review of workmen's compensation cases dating back through 75-78 indicate there were 21 recorded W/C cases in 75-76, 36 cases in 76-77, and 22 cases in 77-78. With the plant population averaging 75 to 85 employees during this period of time, the loss ratio of about 30% remained fairly constant. This 30% workmens comp. frequency rate is somewhat higher than average.

MANAGEMENT INVOLVEMENT:

At the present time, the plant manager views Health & Safety as the general responsibility of Tom Schaffer and Jack Stewart. There is a "Safety Committee" that meets periodically that discusses safety and health type problems; and the plant manager indicates that minutes are kept for this committee. We did not review any minutes because they were not readily available. The plant manager indicates he has attended the meetings and this appears to be the greatest extent of what might be considered management involvement. There is no formally written local Health and Safety program in existence, nor does there appear to be any thoughts at present towards developing any such formalized approach to loss control activities.

PROGRAM VISIBILITY:

Aside from the occasional "Safety Committee" meetings, there is some semblance of visibility with some type of accident investigation attempts and the issuance of an employee directed communication upon initial hiring. Beyond this, there does not appear to be any other signs of program visibility in existence.

CTD017603

ACCIDENT INVESTIGATION:

As indicated above, there is some type of accident investigation conducted at the facility; however, this program is not formalized in any manner and the accident investigations are conducted by the "visiting Safety representative from Kansas City, Jack Stewart". Since these visits are quite spread apart, the ensuing accident investigation must be considered quite limited in what it is able to accomplish. An accident investigation program such as this leaves much to be desired.

PHYSICAL HAZARDS ELIMINATION (Self Inspection):

Wayne indicated that there are "periodic" self inspections conducted by plant personnel which are made a part of the committee meetings previously mentioned. Again, there is no formalized approach to self inspections from a program standpoint.

EMPLOYEE SELECTION AND ASSIGNMENT

Apparently there is a very low turnover rate at this facility. Wayne estimates that turnover is three or four percent per year; therefore, there is not a great deal of new hiring done. A review of the recently hired employees personnel file indicated that there had been no verification of information given in the employee's application form; there was no completed check-lists found, despite the fact that we were told that such check-lists are completed for all new hires. From a very cursory look at this segment of the operation, it would appear that there is not a great deal of turnover within the work force; however, the employment practices seem to be lacking based on the absence of information we were lead to believe exists for each new hire, but lacking in the file of the newest employee hired.

EMPLOYEE INDOCTRINATION AND TRAINING:

As might be expected in a small operation of this type, there is no formal indoctrination and training program. However, there is a check sheet and employee handout combination which was supplied to us that is supposed to be used for indoctrination and training purposes. Whether this form is being used consistently was not determined; however, the most recent hire file did not contain a completed nor uncompleted check list.

REGULATIONS AND PROCEDURES:

There are no posted Company rules or regulations at this facility. However, there are Company rules listed on the pamphlet mentioned above which serves as the employee indoctrination, Safety & Health check list.

CTD017604

PERSONAL PROTECTIVE EQUIPMENT

There is mention of safety shoes and safety glasses on the Safety & Health checklist referred to above, and in addition, the plant manager indicated that hard hats are issued and worn by all first line foremen. Hearing protection is supplied in the wood chip area. The safety shoe program, although not formal, is voluntary. Safety glass are supplied to the employee, but there is no written procedure concerning the issuance nor are there any areas posted in the plant indicating where personal protective equipment is required.

WORKMEN'S COMPENSATION MANAGEMENT

Any workmen's compensation control activities would be handled by the combination of Tom Shaffer and Jack Stewart; however, there is no formal approach to this aspect of the operation. In discussion with Wayne Mertens, it appeared that there is seldom much in the way of communication between us and the people adjusting our workmen's compensation cases, although it is noted that since Fred S. James has taken over this function, there has been a visible contact and (hopefully) increased communications between the facility and the Fred S. James operations. There is no one who, as a part of their defined responsibilities, oversees on a continuing basis, opened WC claims at this operation.

PERFORMANCE MEASUREMENTS AND GOALS

There are no local performance measurements or goals established for department heads and/or first line supervisors. Since this is the case, naturally none of the management at the facility are evaluated and therefore not held accountable for loss control activities.

In summation, the East St. Louis plant, although not inundated with high frequencies of accidents, has no real formal local safety program to deal with its loss control needs. Limited management involvement and the almost total absence of formal written procedures and documentation leads us to believe that, although experience in the past has not been horrendous, it is only because of our good fortune and luck, not because of any controls at the operation. This problem is compounded by the fact that local management feels there is a lack of concern from Group management in this area, as there have been very few contacts between Group and the location where health & safety are concerned. In fact, there has not been a visit to the plant by the Group H & S manager during the 14 or 15 month period that Wayne Mertens has been manager of the facility.