PLAINTIFF'S EXHIBIT
ETCO-341

Giving job instruction, with necessary emphasis on safety aspects of the job, will help eliminate one of the frequent caused of accidents-lack of knowledge and skill. If employees are expected to do their work safely, supervisors must show them exactly how to do the work and must make sure that the employees have the knowledge and skill to do it in exactly that manner.

Assigning people to jobs is closely related to job instruction. Whenever a foreman makes a work assignment, safety, as well as job performance, requires that he be sure the worker is qualified to do the job and thoroughly understands the work method. Even an experienced worker needs some direction.

Supervising people at work is necessary even after a safe work method has been established and workers have been instructed according to that method. People deviate from established safe practices. In order to prevent injuries from this cause, supervisors must watch for unsafe work methods and correct them as soon as they are observed.

Maintaining equipment and workplace in safe condition is no different from maintaining them in efficient condition. Accidents result from tools and equipment in poor condition, from a disorderly workplace, or from makeshift tools used because the right tools are not available. The foreman that keeps their area and equipment in top condition helps to prevent accidents as well as to improve efficiency.

In order to assure that supervision understands their role, Management has issued a policy statement defining their responsibilities, and has outlined as part of the policy of the safety and loss prevention program a clear statement defining the safety duties and responsibilities of all persons and departments.

To help supervision understand and accept their role and to give them specific help in their work of preventing accidents a program of Supervisor Safety Training has been developed.

OBJECTIVES OF SAFETY TRAINING

The following objectives have been established to fulfill the overall goals and objectives of the safety and loss prevention program in providing our supervision with the professional skills to attain safety and loss prevention goals in the company.

1. To involve all supervision in the Company's accident prevention program.
2. To establish line management as being the key person in preventing accidents.
3. To get all levels of management to understand the nature of their safety duties.
4. To provide information on causes of accidents and occupational health hazards and methods of prevention.
5. To give all levels of management an opportunity to consider current problems of accident prevention and to develop solutions based on their own and others' experience.

6. To help all members of management gain skill in safety activities.

7. To help all members of management do the safety job in their own departments or areas.

The knowledge and philosophy of accident prevention is not "just common sense", as some slogans proclaim. It is a specialized body of information accumulated over a period of many years.

The best way to impart attitudes of safety knowledge is to probide a course of safety and loss prevention instruction. This course in safety and loss prevention will follow a well established pattern.

The following outline shows the subjects that will be included in the Safety and Loss Prevention Course for Supervisors.

Session 1

Management Leadership - a review of management's safety and loss prevention policy, an explanation of how management demonstrates this policy and how the supervisor as a member of management has the obligation and responsibility to state and demonstrate this policy.

Session 2

Safety Responsibility - an explanation of the assignment of responsibility of the company, the employee and the supervisor

Session 3

Overview of Worker Protection Laws - pertaining to worker's compensation, federal and state safety legislation and the company's and the supervisor's legal responsibility regarding the laws.

Session 4

Maintaining Safe Work Conditions - establishing the philosophy behind a safety inspection program, how it works, its objectives, how to compare the actual condition of a department with predetermined standards. How the self auditing system accomplishes inspection, reporting, correction and follow-up.

Session 5

Controlling Unsafe Acts With Safety Training - an explanation of all methods of employee safety training used to communicate and motivate workers to perform their jobs safely, including job safety analysis, safety rules and regulations, safe work procedures, signs and tags, safety meetings individual safety contacts, special safety training and new employee safety training.

Session 6

Accident Investigation and Reporting - the basic facts of accident investigation, unsafe acts, unsafe conditions, immediate and contributing causes and the correction of causes for prevention of recurrence.

Session 7

Accountability, Motivation and Communication - review of employee acceptance of accountability through use of basic elements of safety program and leadership provided by supervision. Explanation of methods of motivational and communication techniques used to develop safety attitudes and safety awareness.

Session 8

The Plant Safety and Loss Prevention Program - review the basic elements of safety program, how the basic elements are structured into a program and used with continuity will establish a safety and loss prevention program. How the Plant Safety and Loss Prevention Program has accomplished this with safety policy, assignment of responsibility, sequential safety meetings,Supervisor's Safety and Loss Prevention Manuals and Workbooks.

All supervision, line and staff will be given the course. It will be given with considerable formality. Attendance records will be kept and certificates issued upon completion. This course will be repeated from time to time and any new or upgraded supervision will attend the first available course. Further review and retraining will be scheduled as required, so that supervisors will continue to keep current with new safety techinques and laws.

SAFETY TRAINING OF NEW EMPLOYEES

Safety training begins at the time of employment, before the employee starts work.

An effective Safety and Loss Prevention Program must include a carefully prepared and presented introduction to the Company. When a new employee comes to work, he immediately begins to form attitudes about his Company, his job, his Supervisor and fellow employees. He does so whether or not the employer makes an effort to train him. In order that the new employee develops the proper attitude and learns the things he needs to know, it is important that he receives the right kind of start.

From the first day of employment, employees should know the company's Safety and Loss Prevention Policy. Specifically, they need to know the following things to assure a good safe start with the Company.

1. Management is sincerely interested in preventing accidents.

2. Accidents may occur, but it is possible to prevent them.

3. Mechanical safeguarding has been thoroughly accomplished, and management is willing to go further as needs and methods are discovered.

4. Each employee is expected to report to his foreman unsafe conditions which he encounters in his work.

5. The foreman will give job instruction. No employee is expected to undertake a job until he has learned how to do it and is authorized to do it by his foreman.

6. No employee should undertake a job that appears to be unsafe.

7. If an employee suffers an injury, even a slight one, he is required to report it at once.

This New Employee Orientation Program will be given by the Personnel Department. At this time, the employee will be issued his basic protective equipment and an order will be taken for safety shoes.

As an integral part of orientation, a member of the Safety and Loss Prevention Department discusses the safety items with the employee, the employee will be given a copy of the "Safe Worker At Ethyl" which will also be individually discussed with him.

When the new employee reports to his department, the foreman will provide additional safety instruction. This instruction represents the most important part of the safety indoctrination as it is important that the foreman establish the importance of safety within his particular department.

Further job safety instruction can be given with the use of the job safety analysis and safety work procedures.

SAFETY TRAINING OF TRANSFERRED EMPLOYEES

When a transferred employee reports to his new department, the foreman will provide a re-orientation of the safety program.

It is important that a foreman establishes the importance of safety within his department.

Further job safety instructions can be given with the use of the job safety analysis and the safe work procedures.

SPECIAL SAFETY AND LOSS PREVENTION TRAINING

Special safety and operating training is required by governmental agencies or because of hazardous operations within the plant. When this training is required, the Safety and Loss Prevention Department will coordinate the training with the department requiring the training.

The key to any safety program is employee job training in safe work methods for each occupation. The employee must have complete knowledge and understanding of what is to be done, how to do it safely, and thorough understanding of all hazards involved in doing the job. This can best be accomplished by having specific written instructions for every job which is performed.

These safe work procedures will be established by developing job safety analysis, safe work procedure, safety rules of operating type functions, and for maintenance type functions.

These safety guidelines must be intergrated into the employee training program which instructs the employees how to do the job safely and correctly.

Guidelines for implementing this program will be outlined in part 10, Employee Safety Program. The basic element will include:

1. Job Safety Analysis
2. Safety Rules, Safe Work Procedures, Safety Signs or Tags
3. Individual Safety Contacts
4. Safety Meetings
5. Employee Safety Records