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Tulsa

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LIBERTY
MUTUAL



Liberty Mutual Building, 216 Pine Street, San Francisco, California 94104 • Tel. 421-6915

March 13, 1972

PLAINTIFF'S
EXHIBIT

KM-306

Mr. Robert Miller
Production Manager
Kelly - Moore Paint Co., Inc.
1015 Commercial Street
San Carlos, CA 94070

Dear Bob:

I have enclosed two copies of a confirmation letter from our Loss Prevention Representative in Tulsa, Oklahoma. I have written him regarding the first two recommendations so that he will bring his recommendations in line with the OSHA regulations.

First dust respirators, I suggested that Benny recommend that the wearing of respirators be made mandatory. Asbestos exposures are target areas under the new federal regulation and employees should be provided with maximum protection from this exposure.

Secondly, it has been an old practice to place an air compressor against the wall so that the drive mechanism is away from the opened area. However, new regulations require that the drive mechanism be completely enclosed on compressors. I suggested that he submit that recommendation again to comply with the Federal Regulations.

Cordially,

Bob McDowell
Sr. Loss Prevention Representative

BM/dl

KMX 00641

MAR 8 1972

March 6, 1972

Mr. Robert Spencer, Plant Manager
Kelly-Moore Paint Company, Inc.
3205 Southwest Boulevard
Tulsa, Oklahoma

Dear Mr. Spencer:

Thanks for the time you spent with Roger Nielsen and me on March 3, 1972. The fire hazard in your plant is considerably reduced from what I had expected due to the fact that you only manufacture dry wall material. You have no paint nor paint ingredients in your building.

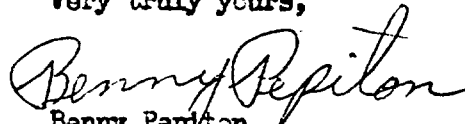
The following recommendations were discussed with you during our visit:

1. DUST RESPIRATORS: You indicated that all employees were provided with respirators. You should also encourage them to wear them due to the dustiness of some of the processes.
2. AIR COMPRESSOR GUARD: A guard should be put over either the air compressor V-belt or the compressor turnaround so the belt and pulley are up against the wall. This would protect employees who get near the compressor from getting caught between the V-belt and the pulley.
3. FORK LIFT TRUCK CANOPY GUARD: You indicated that canopy guards had been ordered for the two fork lift trucks, and they should be in soon.

We discussed the need for training your employees in proper lifting techniques. I will give you a call within the next three weeks to set up a meeting and demonstration of Liberty Mutual's lifting robot.

Meanwhile, if I can be of assistance in your accident prevention program, please give me a call.

Very truly yours,


Benny Periton
Loss Prevention Consultant

ERP/jh

KMX 00642