RAGSDALE / T.H.C.

PLAINTIFF'S EXHIBIT AL-1128

SAFETY AUDIT FROM EVALUATION TEAM INTERVIEWS

SAFETY PROGRAM EVALUATION

The numerical values to be inserted below are the weighted ratings calculated from the attached evaluation sheets. The total of these ratings becomes the overall rating for the plant or location.

I.	Commitment	- 9.9 %
II.	Organization and Administration	- 1.9 %
III.	Communication	- 35.7 %
IV.	Accident/Near Miss Investigation	- 2.6 %
V.	Hazard & Engineering Controls	- .97 %
VI.	Industrial Hygiene & Medical Surviellance	- 1.35 %
VII.	Work Practice Controls	- .38 %
VIII.	Training	- 2.16 %
IX.	Motivation	- 2.53 %
	Total	- ~~[illegible]~~ 25.4%

= Overall plant rating

Accident-Injury Experience

	1988	1989	1990
On-the-Job SIFR			
On-the-Job Days Lost or Charged			
Off-the-Job LWD Case FR			
Contracted Services SIFR			

* will fax back completed form. 303-781-4406

10/14/91 [illegible] Bill Robert Krumberger to get data for above chart — Ragsdale Marketing

* Left message.

962356 0049

Marilyn Ziegler:
412-553-3835

Please note action items circled
on page 1. As discussed by
mx! If you have any
questions, please give me a call.
Please Capeup this week.

Ron Jane

RMS
Audit Report
Richmond

Example.
Copy - Audit Book.
~~rating~~ & why
Grade
Observations
Score
reasons
recommendation

I. COMMITMENT

A. Location Safety & IH Policy

Rating - Good
- Has signed, posted local policy.
- Meets corporate requirements.

Recommendations

- Needs formalized process for policy development.
- Needs each level of management to formally review the policy with their employees.
- Needs to have a planned schedule for review of policy.

I. COMMITMENT -

B. Top Management Visibility and Involvement

Rating - Good

- Location's management is involved in safety committee.
- Location's management takes a hands-on approach.

Recommendations

- Ragsdale needs to better define and communicate the role of the executive safety committee and the Ragsdale location committee.
- Minutes of ESC should be communicated to all line managers to serve as model and provide direction.

I. COMMITMENT -

C. Safety as an Equal Priority

Rating - Good

- T.H.E. much better housekeeping.
- Most people believe that safety is a priority . Safety is discussed at all staff meetings. Money is being spent.

Recommendations

- JSA's/ESA's need to be current, prominent.
- Housekeeping needs improvement.
  - Storage in office hallways.
  - Paint/can track area.
  - Shipping and Receiving
  - Outdoor
- Need re-evaluation of maintenance resources. Equipment sales/demonstrations need to be improved.

I. COMMITMENT -

D. Clearly defined Safety & IH Responsibilities

Rating - Fair

- Safety responsibilities are written.
- Burden of responsibility is still management.

Recommendations

- All department supervisors need to have the same level of understanding and commitment to safety as the best.
- Safety must be viewed as an integral part of performance.

II. ORGANIZATION AND ADMINISTRATION

A. Executive Safety and Health Committee

Rating - Fair

- Line management under represented (loop).

Recommendations

- T.H.E. to join Ragsdale's committee.
- Include general foreman, supervisors, etc.

II. ORGANIZATION AND ADMINISTRATION

B. Joint Safety and Health Committee

Rating - Poor

- Ragsdale does not conduct consistent committees with an agenda.
- T.H.E. involves a supervisor, 3-hourly employees and R. Krumberger.

Recommendations

- Ragsdale to reconstruct previous joint S&H committee.
- T.H.E. to develop an agenda (hourly to assist).

II. ORGANIZATION AND ADMINISTRATION

C. Department and Other Safety Subcommittees and Task Forces, etc.

Rating - Fair

- Cut Busters and QIP activities to address safety, but this is a minimum coverage.

Recommendations

- The majority of departments (or work groups) should have consistent (monthly) committee meetings.
- Organizational status via executive safety committee/joint safety committee.

II. ORGANIZATION AND ADMINISTRATION

D. Adequately Trained and Supported Safety & IH Staff

Rating - Fair
- Primary deficiency is lack of time.

Recommendations
- Accelerate supplementary assistance (R. Krumberger to prioritize).

III. COMMUNICATIONS -

A. Atmosphere for Employee Involvement

Rating - Fair

- Few department teams exist.
- Does have a safety suggestion system.

Recommendations

- Need to establish a joint safety IH committee.
- Need to clearly annunciate authority and responsibilities.
- Need to publicize committee actions.

III. COMMUNICATIONS -

B. Use of Bulletin Boards

Rating - Fair

- Does use bulletin boards.

Recommendations

- Sectionalize boards.
- Have procedure for update notification.
- Use more safety grams.

III. COMMUNICATIONS -

C. Distribution of "Off-the-Job" Literature

Rating - Fair

- Uses monthly safety magazine for OTJ safety information.
- Occasionally uses newsletters for OTJ.

Recommendations

- Develop program to specifically addendum "OTJ" safety.
- Set up OTJ safety committee/team.
- Track OTJ safety status.

III. COMMUNICATIONS -

D. In-plant Safety Newsletter

Rating - Fair

- They do have one.

Recommendations

- Publish in advance and promote article submission.
- Invite suggestions for topics in addition to article.
- Promote increased home use.
- Get T.H.E. into newsletter.

III. COMMUNICATIONS -

E. Feedback loop for IH Sampling

Rating - Fair

- Posting of area sampling results.

Recommendations

- Need to step up training programs as they relate to IH, i.e. haz comm (material specific), hearing conservation, respiratory protection.

III. COMMUNICATIONS -

F. Safety Suggestion System

Rating - Good

Recommendations

- Increase the number of locations.
- Simplify the process.
- Define the approval, implementation process, speed up implementation.

IV. ACCIDENT/NEAR-MISS INVESTIGATION AND REPORTING

A. Alcoa/OSHA/MSHA Reporting practices

Rating - Fair

- Backup documentation scattered.
- Inconsistent filing methods.
- Not a clear understanding about recording hearing loss.
- Supervisors, as a group, not clear on record keeping requirements.

Recommendations

- Obtain updated Triple I Forms with Type 6 specifier and vertical/crane designation.
- Develop consistent policy for determining injury classification (supervisors - personnel director, etc.).
- Incorporate training efforts at T.H.E. to remain consistent and to help employees' understand importance of injury reporting.

IV. ACCIDENT/NEAR-MISS INVESTIGATION AND REPORTING

B. Reporting Practices for First Aid and Injury-Free Events.

Rating - Fair

- First aid injuries not consistently reported.
- No in-depth analysis of first aid and near misses (injury-free event).
- Management not consistently involved in accident investigations.

Recommendations

- Continue efforts to train employees in CORE principles to emphasize importance of reporting injuries.
- Pursue analysis of first aid and near-miss incidents to become more pro-active in injury/illness prevention.
- Management should consistently be involved in serious injury accident investigations.
- First-line supervisors should be involved in all accident/incident investigations.

IV. ACCIDENT/NEAR-MISS INVESTIGATION AND REPORTING

C. Quality of Investigations and Analysis

Rating - Fair

- Not all supervisors have received CORE training in accident investigations.
- Not all managers consistently participate in accident investigations in respective departments.

Recommendations

- Develop an accident investigation policy. For example: All serious injuries will be investigated by plant manager, manager of area, general forman, line supervisors, safety director and involved employee.
- Develop policy for injury classification.

IV. ACCIDENT/NEAR-MISS INVESTIGATION AND REPORTING

D. Follow-up on Identified Corrective Actions.

Rating - Fair

- No verification of follow-up by supervisor (T.H.E.) or other responsible parties (Ragsdale).
- No pro-active program for follow-up system.

Recommendations

- Supervisor should have formal system of follow-up on corrective action(s) taken (T.H.E.).
- Documentation from responsible parties on follow-up should be maintained.

IV. ACCIDENT/NEAR-MISS INVESTIGATION AND REPORTING

E. Statistical Analysis of Accident/Injury/Exposure Data

<u>Rating</u> - Poor

- CADA reports not distributed to respective departments.

<u>Recommendations</u>

- Distribute CADA reports to all supervisors to assist in understanding accident/injury problems of each department.

V. HAZARD & ENGINEERING CONTROLS -

A. Compliance w/ Regulation

Rating - Fair

- Some attempts at compliance.
- Some problems exist.

Recommendations

- Accelerate CORE training.
- Bring additional resources in, specifically policy development/deployment and Hazard abatement.

V. HAZARD & ENGINEERING CONTROLS -

B. Planned Inspection Programs

Rating - Poor

Recommendations

- Need to develop formal/plant-wide inspection programs.
- Need overlapping inspection
- Need periodic analysis of results.
- Need established STD's of performance.
- Need pre-operator inspection programs.

V. HAZARD & ENGINEERING CONTROLS -

C. Housekeeping

Rating - Fair

- T.H.E. much better than Ragsdale

Recommendations

- Need formal housekeeping policy.
- Assigned responsibilities.
- Measurable STD's
- Need records.

V. HAZARDOUS & ENGINEERING CONTROLS -

D. Lockout/Tagout

Rating - Fair
- Program is written
- Training has begun.

Recommendation
- Need to bring training down to the "affected employee" level.
- Contractors need to be trained and certified.

V. HAZARDOUS & ENGINEERING CONTROLS -

F. Fall Prevention Program

Rating - Poor

- No formal survey documented for evaluating potential fall hazards.
- Not all employees trained in fall prevention/protection.
- No guardrails in place on top of office area at T.H.E. to prevent fall.

Recommendations

- Perform and document a formal survey of fall hazards.
- Train all employees on requirements of fall prevention / protection program.
- Install guardrails on top of office area at T.H.E. or eliminate storage.

V. HAZARDOUS & ENGINEERING CONTROLS -

G. Mobile Equipment Safety Practices

Rating - Poor

- No written training program on crane operation.
- No medical examinations for vehicle operators.
- No pre-shift inspections for cranes or other industrial vehicles.

Recommendations

- Develop a training program for crane operators.
- Develop inspection checklists for cranes and vehicles.
- Review and incorporate medical protocols into mobile equipment operator training program.

V. HAZARDOUS & ENGINEERING CONTROLS -

H. Project Safety and Review Procedures

Rating - Poor
- Does not exist.

Recommendations
- Need to develop the process.
- Document all meetings.
- Resolve problems.
- Retain records.

V. HAZARDOUS & ENGINEERING CONTROLS -

I. Compliance with Alcoa Engineering Standards

Rate - Poor

- Engineering department does not incorporate engineering standards into design considerations and operating practices.
- Safety and health engineering standards not communicated beyond safety personnel and engineering manager.
- No formal program in place to ensure contractor compliance with STDs.

Recommendations

- Engineers and supervisors should be trained on importance of complying with requirement of STDs.
- Engineering should regularly involve safety department in product design/revision decisions to ensure compliance.
- Develop program to ensure contractor compliance.

V. HAZARDOUS & ENGINEERING CONTROLS -

K. Welding, Burning and Hot Work Procedures

Rating - Poor
- Program not adopted.

Recommendations
- Need to adopt program.
- Train employees.
- Monitor program.
- Train contractors.
- Review requirements for ventilation and IH monitoring of affected employees.

V. HAZARDOUS & ENGINEERING CONTROLS -

L. Pre-Selection and Use

Rating - Poor

- Proper equipment not provided (prescription glasses not ANSI approved) (No pre-required/supplied for handling corrosives).
- Equipment not adequate for specific hazards (side shields not required for working around machinery - T.H.E.).
- No written, formal policy on use of shaded glasses.
- Jewelry policy not consistent between plants.

Recommendations

- Require and enforce use of ANSI approved eye protection.
- Require use of side shields at both plants.
- Develop written policy on use of shaded lenses.
- Enforce consistent policies in both plants.

V. HAZARDOUS & ENGINEERING CONTROLS -

M. Emergency Procedures, Equipment and Response

Rating - Fair

- Drills not conducted on regular basis.
- Emergency lighting not provided.
- Fire brigade (emergency brigade) not formally trained.
- Fire extinguishers not inspected monthly.
- Exit lights not in continuous operation.
- Not all fire extinguishers are mounted and identified (red bldg. column).

Recommendations

- Regularly schedule emergency drills.
- Provide emergency lighting
- Train all emergency response personnel.
- Inspect extinguishers monthly and document.
- Fix exit lighting.
- Mount and identify extinguishers consistently.

V. HAZARDOUS & ENGINEERING CONTROLS -

N. Product Safety

Rating - Fair

- 4 Claims last 2 years.
- Accountability poorly defined.
- No centralized records.
- Labeling deficiencies
- Warnings in literature (noise)
- Training

Recommendations

- Assign accountability (Team).
- Improve record keeping.
- Establish design review.
- Engineering modifications.
- Machine labels.
- Upgrade product literature.

V. HAZARDOUS & ENGINEERING CONTROLS -

O. Toxic Substances Control Act

Rating - Poor

- Accountability assigned.
- TSCA P.O. Note not used.
- Japan printing inks - "Section 5 Violation"
- TSCA Poster - 8(c), 8(e)
- TSCA Training

Recommendations

- Implement P.O. Notes (procurement).
- Train employees, supervisors, medical.
- Implement reporting process.
- Modify posters.

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

A. Medical Protocols used for Critical Jobs

Ratings - Poor

- Pre-employment physical
- Pre-employment respirator clearance
- ***Baseline*** audiometric testing
- Drug program
- Not aware of Alcoa protocols

Recommendations

- Implement Alcoa medical protocols for job classifications and chemical/physical exposures
- Annual audiometric testing
- Ongoing medical clearance for respirator users
- Review ADA act

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

B. Access to Adequate IH Equipment

Rating - Fair

- CGI, detector tubes, pump available
- No calibration program
- R. Krumberger's equipment
- Too reliant on EHL

Recommendations

- Purchase own equipment
- Develop calibration practices
- Train people to sample

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

C. Established Hazard Communication Program

Ratings - Poor (Ragsdale) Fair (T.H.E.)

- No department inventories
- Lacking MSDS
- No in-house labeling
- No specialized training
- Generic training has been done

Recommendations

- Complete written program
- Implement HAZ Min
- Develop Department Inventories
- Conduct specialized training
- Improve purchasing controls
- MSDS/labels waste products
- SARA reporting

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

D. Exposure Assessments

Rating - Fair

- MSDS/chemical exposures not assessed
- Baseline IH sampling <50%
- Noise surveys conducted
- Paint, welding, grinding
- IH sampling feedback occurs

Recommendations

- Link chemicals with sampling needs
- Develop baselines/periodic for job classifications
  - Ozone,NOX - Lead - Cobalt
  - Pentacles - Solvents - Oil Mist
  - Methylene Chloride
  - Glycol Ethers
- Need stel sampling
- Explain IH results
- Prioritize engineering controls

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

E. Effective Respiratory Protection / Pulmonary Surveillance Program

Rating - Poor

- Respirator training has occurred.
- Fit testing done
- Beard policy implemented.
- Written program developed.
- Pre-employment medical certification.

Recommendation

- * Enforcement for over-exposures (welding).
- Ongoing medical surveillance.
- Compliance with Alcoa medical protocols.
- Eliminate unapproved respirators.

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

F. Hearing Conservation

Rating - Fair

- New hires - baseline
- Baseline audiometric listing.
- Noise surveys conducted.
- Noise signs posted.
- Noise program written.
- Training.

Recommendations

- Complete noise evaluations
- Annual audiometric testing.
- Noise abatement plan needed.

VI. INDUSTRIAL HYGIENE & MEDICAL SURVEILLANCE

H. Health Hazard Control

Rating - Fair

- Critical jobs evaluated.
- Toxic materials may exist.
- Material substitution (lead).
- Engineering controls needed (welding, grinding).
- Engineering controls implemented.

Recommendations

- Eliminate toxic materials.
- Project safety reviews.
- Engineering plan.
- RFA's noise.
- Evaluate skin absorption.
- PPE chemicals - corrosives.
- Maintenance of local exhaust ventilation.
- Welders without respirators.

VII. WORK PRACTICE CONTROLS

A. Effective Safety Rules

Rating - Poor

- No evidence of group input.

Recommendations

- Include committee members, job levels or assign a special committee.

VII. WORK PRACTICE CONTROLS

B. Contracted Services Safety

Rating - Poor
- Program not yet implemented.

Recommendations

- Approve written plan and fully implement.
- Also, carefully implement the mandatory standards.

VII. WORK PRACTICE CONTROLS

C. Job Safety Analysis

Rating - Poor

- S/R has completed some JSA's but not effective (notebook).
- Very little to no JSA activity in the remaining plant(s).

Recommendations

- Develop JSA list (Sell Core).
- Develop JSA's for ***most*** routine and non-routine jobs in ***each*** department.
- Use PJO's to update JSA's.

VII. WORK PRACTICE CONTROLS

D. Equipment Safety Analysis

Rating - Poor

- Very limited activity and usage (S&R).

Recommendations

- Develop ESA job list for ***most*** routine and non-routine equipment in ***each*** department.
- Construct ESA'a using hourly involvement.
- Update while performing PJO's.

VII. WORK PRACTICE CONTROLS

E. Planned Job Observations

Rating - Poor

- Lacks formal observation program that requires task observation (JSA/ESA) at some required frequency by supervising personnel.

R ecommendations

- Implement PJO
- Supplement with Duponts Stop Program and/or B.S.T.

VII. WORK PRACTICE CONTROLS

F. Special Safety Standards and Operating Procedures

Rating - Fair

- LO/TO and emergency guidelines are in place (have other plans ready but not yet approved by Management).

Recommendations

- Pending plans to be approved/implemented.
- Develop OSHA Electrical Training procedure and annual electrical survey.

VIII. TRAINING

A. Training Plan

Rating - Poor

- Lack of formal training plan.

Recommendations

- Identify areas of needed training for plant-wide and departmental assistance.
- Schedule an annual calendar to include who, when, type of training, and completion date.

VIII. TRAINING

B. Regularly Scheduled Toolbox/Department Safety Meetings

Rating - Fair

- Attempts and attitudes to conduct some department meetings are lacking in frequency (exception T.H.E.) and planning.

Recommendations

- Conduct on regular basis.
- Written outline of annual topics
- Topics meet plant's needs

VIII. TRAINING

C. Special Training Efforts

Rating - Fair

- Limited special training is available for emergency response, first aid, and corporate sponsored activities

Recommendations

- Provide very proactive special training for emergency response, hazardous materials, defensive driving, back to school via national safety council, local universities, and OSHA sponsored courses.

VIII. TRAINING

D. Supervisory Training

Rating - Fair
- Some training is provided/offered to supervision

Recommendations

- Provide additional time and training resources to improve critical basics of task observation techniques.

VIII. TRAINING

E. Core Training

Rating - Fair

- Most supervisors, have received some core training but records are incomplete

Recommendations

- Provide effective and timely core training for new supervisors
- Provide refresher core training for all supervisors
- Maintain complete training documentation

VIII. TRAINING

F. New or Transferred Employee Orientation

Rating - Poor
- Training is informal

Recommendations

- Develop a formal program to include:
  - Checklist of items to cover
  - Resources for quality presentation
  - Suitable place void of interruptions

IX. MOTIVATION

A. Formal Indexes For Monitoring Performance

Rating - Fair

- Do not collect/analyze injury statistics for off-the-job and contracted services.
- No formal schedule for departmental audits.

Recommendations

- Regularly conduct departmental audits and document findings.
- Collect and analyze off-the-job and contractor statistics
- Safety Department should confirm results of departmental audits on regular basis.

IX. MOTIVATION

B. Fair and Consistent Enforcement of Safety Rules and Work Practices

Rating - Fair

- No consistent enforcement of corrective measures
- No written policy on enforcement
- Line management responsibilities for corrective measures not clearly defined.

Recommendations

- Policy endorsed by both union and management should be written and communicated.
- Line management responsibilities should be written and communicated.

IX. MOTIVATION

C. Safety Awards/Incentives/Contests

Rating - Fair

- Awards/incentives/contests not consistently offered.
- No formal communication system to promote ideas.

Recommendations

- Create consistent program.
- Develop a formal system of communicating safety recognition messages.