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September 17, 1973

To: Mr. Bartels
Mr. Ross
Mr. Scott
Mr. Thacker

Re: Compliance with the Occupational Safety and Health Act

At my request, Paul Arthur surveyed the several operating divisions to determine how they were responding to the requirements of the Occupational Safety and Health Act.

Mr. Arthur reported that the Chemical and Pharmaceutical Divisions had established a review system which, to date, has not been implemented by the other divisions.

This system, in essence, involves each division's establishing an OSHA Committee from Headquarters, consisting of representatives from Corporate Safety, Engineering, Legal and the Management and/or Production staff of the operating division concerned, with a representative from the operating division customarily serving as chairman. Such a unit seems to contain the disciplines required to consider the problems connected with OSHA, and I feel that, coming from Headquarters, it brings with it a desirable degree of objectivity and also serves to insure a uniformity of interpretation of the numerous OSHA standards.

The various installations should also set up local OSHA committees to conduct their own internal compliance reviews, if they have not already done so. Thereafter, the Headquarters Committee for the division involved should meet with the local committee at the site in question to review any unclear areas and to attempt to resolve any questions which the local group may have.

I feel that it would be beneficial for each of the operating divisions to take part in a review of this type, and I would, therefore, appreciate your advising me of the names of the representatives which you designate for the Headquarters OSHA Committee or Committees within your respective areas of responsibility, as well as of projected dates for visits of such Committees to the installations for which you are responsible.


E. T. Pratt, Jr.

cc: Dr. Laubach
Mr. Heiges
Mr. Lum
Mr. Arthur
Mr. Harger
Mr. McCreery
Mr. Osti

Safety - J. E. Smith
Engineering - Art Smith
Legal - J. E. Smith
Production - J. E. Smith
Maintenance - J. E. Smith