

memo from:
G. W. Martin

B.J.S

PAT WILL TALK
WITH ON THIS WRITUP
HOWEVER HE WANTS
A RANGE OF COST
ANTICIPATION FOR
3 AREAS

- ANNUAL COST
TRAVEL EXPENSE ETC
- FIXED
RELOCATING A PERSON
- TRAINING
SCHOOLS, WORKSHOP

REYNOLDS METALS COMPANY
RICHMOND, VIRGINIA 23261

804/231-2536



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RMC0068454

DOES NOT INCLUDE
COMMENTS ABOUT AIRBORNE
STUMPY ET AL.

NO MENTION OF
MEDICAL

studies were conducted by corporate, division and plant personnel or by outside consultants. Whenever exposures did not comply with OSHA standards, an agreement was negotiated with the plant management and an appropriate response was formulated to limit exposures and protect employee health.

5. Industrial Hygiene Programs. In addition to the general industrial hygiene activities and studies described above, there are also specific industrial hygiene programs, some of which are described below:

- (1) Hearing Conservation Program
- (2) Hazard Communication Program
- (3) Respiratory Protection Program
- (4) Asbestos Control Program

6. Industrial Hygiene Audits. There is no formal audit program to verify the effectiveness of these industrial hygiene activities. Instead, the plants are given responsibility for complying with the OSHA standards and implementing the policies and procedures established by Corporate Industrial Hygiene.

III. THREE PROPOSALS FOR A REYNOLDS AUDIT

A. Common Elements in the Three Options

1. Management Support. All the options described below are based upon an expansion of the ISRS program. Managerial support is a requirement for each of the options. To maximize management support, all audit reports should be sent to the plant manager, the Division General Manager and the Corporate Director

of Safety. The plant manager should file a follow-up report within 60 days of the audit report. The Plant manager should also file progress reports every month thereafter until all deficiencies are resolved.

A quarterly synopsis of the audit reports should be submitted to the Chief Operating Officer and the Chief Executive Officer. An annual synopsis might also be submitted to the Board of Directors.

AUDIT LEVEL RECOMMENDED BY DEPARTMENT HEADS
B. ~~The Elaborate Audit~~ - Safety ~~COMPREHENSIVE~~ ~~CAUTION~~ PONTIAC

The elaborate audit described below would place Reynolds among the top 50% in the audit survey.

1. OSHA Amendment to ISRS. The ISRS audit book does not focus on the OSHA standards. Therefore, a separate chapter on OSHA standards should be drafted for the ISRS audit book. This chapter could be drafted by the Corporate Safety or an outside contractor.

Auditors would check for OSHA compliance during their plant tour. The plant tour, however, would not rise to the level of a wall-to-wall OSHA inspection. Instead, it would involve spot checks and random samples. During the last part of the plant tour, the auditors might revisit any problem areas for a closer examination.

2. Auditor Training. There are presently 12 Reynolds auditors certified by ISRS. Only five of the 12 have sufficient knowledge of the OSHA standards to recognize potential violations. The auditors who lack sufficient knowledge must be trained.

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OSHA operates a school in Chicago where OSHA compliance officers are trained. The school conducts a series of one-week courses. Reynolds' auditors should enroll in six of these one-week courses to familiarize them with the various aspects of the OSHA standards. The Reynolds auditors would then attend a one-week training program conducted by Reynolds. The novice auditors would also serve an apprenticeship of two plant inspections with an auditor who is familiar with the OSHA standards.

3. Personnel. There are presently 12 certified auditors. An inspection team is usually comprised of two auditors. Each team conducts an average of one inspection per quarter or four per year. Eighty plants, including the seven in Canada, will be in the ISRS program. It follows that, at a rate of 24 inspections per year, the six teams will inspect the 80 plants in three and one-third years--assuming the program operates without problems.

To be effective, the plants should be audited on an 18-month to two-year cycle. This involves 40 to 53 inspections per year. At a rate of four audits per year, Reynolds would need 10 to 13 teams to reach the 18-month to two-year cycle. There are presently only six teams. Therefore, Reynolds would need five to seven additional teams. There are two persons on each team, so 10 to 14 additional persons would be required.

It is recommended that two safety specialists be added to Corporate Safety as well as one clerical employee. The safety specialists would perform ISRS audits and conduct the plant

level training that was discontinued in 1989. The clerical employee would handle the ISRS paperwork. The remaining eight to 12 auditors would come from persons already on the payroll at the division and plant levels.

B. ~~The Elaborate~~ Audit - Industrial Hygiene

1. Industrial Hygiene Amendment to ISRS. The ISRS audit book does not give sufficient attention to industrial hygiene concerns. Accordingly, a new chapter on industrial hygiene should be added to the ISRS audit book. This chapter could be drafted in-house or by an outside contractor.

The industrial hygiene part of the audit would not be a "fine tooth comb" audit. During the plant tour, the auditors would use the industrial hygiene chapter to spot potential problem areas that would be more thoroughly investigated later. Under this elaborate audit program, an industrial hygienist would be part of the audit team at plants where there are potential health problems, e.g., reduction, can, mill products, etc.

2. Auditor Training. Each auditor, who is not an industrial hygienist, should receive three days of training to familiarize them with the fundamentals of industrial hygiene. This training would be conducted by Reynolds' Industrial Hygiene group.

3. Personnel. It is recommended that five people be added to the Industrial Hygiene staff by hiring one industrial hygienist and one part-time technical assistant. This "loaves and fishes" phenomenon would be accomplished as follows: The Director of Industrial Hygiene and Toxicology (H. M. Cole) would manage

three separate functions in the Industrial Hygiene group - field operations, programs and automation.

(a) Field Operations. The Manager of Field Operations (R. E. Benton) would supervise five regional industrial hygienists who would be members of the audit teams in their regions.

- (1) Stacy Selph - East Coast based in Richmond - Ms. Selph is a Reynolds staff hygienist presently based in Richmond.
- (2) Carl Stumpe - South based in Listerhill - Mr. Stumpe is a certified industrial hygienist presently employed as the Safety Director at the Alloys plant.
- (3) Ronald Nordlund - West Coast based in Troutdale - Mr. Nordlund is a certified industrial hygienist who presently has industrial hygiene and environmental responsibilities at Troutdale.
- (4) Marc Champagne - Canada based in Baie Comeau - Mr. Champagne is a hygienist presently based in Baie Comeau.
- (5) A new hire would fill a fifth industrial hygiene position. This person would be based in Richmond, Louisville or Chicago and would be responsible for the midwest.

(b) Programs. The Manager of Programs (Susan Gidley) would be converted from a part-time to a full time

employee. She would report to Mr. Cole. A part-time technician would be hired to assist Ms. Gidley with the industrial hygiene programs that would be subject to the audit, e.g., hazard communication, hearing conservation, asbestos, etc. This part-time technician would be the second new hire under the elaborate hygiene option.

(c) Automation. The Automation Specialist (William Shannon) would also report to Mr. Cole and would manage the software and data generated by the audits and the industrial hygiene programs.

C. The Not So Elaborate Audit - Safety

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The not so elaborate audit described below would place Reynolds near the 50% mark in the audit survey.

1. OSHA Amendment to ISRS. Under this option, a separate chapter on OSHA inspections must still be added to the ISRS audit book. To reduce the cost, the chapter could be written by Corporate Safety or by a "low budget" graduate student.

2. Auditor Training. Those auditors who do not have a working knowledge of the OSHA standards would have to be trained. This option would involved two weeks of training at a recognized compliance school, e.g., OSHA, National Safety Counsel, etc. It would also involved two weeks of training at Reynolds--one week in a classroom and a second week in a plant. Novice auditors would then serve an apprenticeship of two audits with one of the five senior auditors prior to achieving journeyman status.

3. Personnel. To achieve a two and one-half to three year audit cycle, there must be 27 to 32 audits per year. Each

pair of auditors on an inspection team conducts an average of four audits per year. There are presently 80 plants and six teams, but seven to eight teams would be required to establish a two and one-half to three year audit cycle.

For this option, it is recommended that one safety specialist be added to Corporate Safety, as well as one clerk. The safety specialist would handle ISRS audits and plant level training. The clerk would be responsible for ISRS paperwork. The remaining one to three auditors would come from personnel already employed at the division or plant levels.

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D. The Not So ~~Elaborate~~ Audit - Industrial Hygiene

1. Industrial Hygiene Amendment to ISRS. To save money, the new industrial hygiene chapter in the ISRS audit book could be written in-house or by a graduate student.

2. Auditor Training. Each auditor who is not an industrial hygienist should receive three days of industrial hygiene training. The training would be conducted by Corporate Industrial Hygiene.

3. Personnel. Under the "not so elaborate program", only four people would be added to the Industrial Hygiene staff by hiring one part-time technical assistant. Once again, Mr. Cole would divide industrial hygiene into three functions--field operations, programs and automation.

(a) Field Operations. The Manager of Field Operations (R. E. Benton) would supervise four regional industrial hygienists.

- (1) Stacy Selph - East Coast based in Richmond - Ms. Selph is a Reynolds staff hygienist presently based in Richmond.
- (2) Carl Stumpe - South based in Listerhill - Mr. Stumpe is a certified industrial hygienist presently employed as the Safety Director at the Alloys plant.
- (3) Ronald Nordlund - West Coast based in Troutdale - Mr. Nordlund is a certified industrial hygienist who presently has industrial hygiene and environmental responsibilities at Troutdale.
- (4) Marc Champagne - Canada based in Baie Comeau - Mr. Champagne is a hygienist presently based in Baie Comeau.

These regional hygienists would not be members of the audit teams. Instead, the auditors would raise industrial hygiene issues, which would subsequently be addressed by the regional hygienists. No new hygienists would be hired.

(b) Programs. The Manager of Programs (Susan Gidley) would be converted from a part-time to a full time employee. She would report to Mr. Cole. A part-time technician would be hired to assist Ms. Gidley with the industrial hygiene programs that would be subject to the audits. This part-time technician is the only new hire under this option.

(c) Automation. The Automation Specialist (William Shannon) would also report to Mr. Cole and would manage

the software and data generated by the audits and the industrial hygiene programs.

E. The Blue Light Special - Safety

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The blue light special audit described below would put Reynolds in the survey's affirmative response group.

1. OSHA Amendment to ISRS. Once again, an OSHA chapter would be added to the ISRS audit book. The least expensive method to write this material would be a "low budget" graduate student or in-house writers.

2. Auditor Training. Those auditors not familiar with the OSHA standards should receive at least two weeks of training from Corporate Safety personnel. This would involve one week in a classroom and one week in a plant. Novice auditors would also serve an apprenticeship of two audits with one of the five senior auditors.

3. Personnel. To maintain a three-year inspection cycle among the 80 plants, two to four additional auditors are needed and one clerk. In the "blue light special" program, all the auditors would be recruited from the divisions and the plants. The newly hired clerk would handle ISRS paperwork.

It should be noted that this "blue light special" option does not resurrect Corporate Safety's plant level training program, which was discontinued in 1989. This means auditors will find training deficiencies for which there will be no apparent solution.

F. The Blue Light Special Audit - Industrial Hygiene

1. Industrial Hygiene Amendment to ISRS. The new industrial hygiene chapter in the ISRS audit book would be written in-house or by a graduate student.

2. Auditor Training. Each auditor who is not an industrial hygienist should receive three days of industrial hygiene training.

3. Personnel. The blue light special option involves the transfer of one hygienist, the conversion of a part-time employee to full time status and the hiring of one part-time employee. Carl Stumpe, presently at Alloys, would become an industrial hygienist based in Richmond. He would assist the other hygienists, H. M. Cole, R. E. Benton and S. L. Selph. These hygienists would analyze the industrial hygiene issues raised by the auditors. Susan Gidley would become a full time employee. She would be responsible for industrial hygiene programs, i.e., the programs subject to the audits. A part-time technician would be hired to assist Ms Gidley.

The "blue light special" option does not resolve the other problems that plague the industrial hygiene group. Many of the industrial hygiene programs described in Part IIB. are not being addressed in a timely fashion. Some of these programs are mandated by OSHA. There is, for example, a backlog of 2500 Material Safety Data Sheets that must be analyzed pursuant to the OSHA hazard communication standard. There is also a backlog of hazard evaluation inspections mandated by OSHA's air contaminants standard. The burden of analyzing industrial hygiene issues raised in the audits would increase this backlog.

G. The Consultant Option

Consultants or insurance carriers could be used as auditors in lieu of Reynolds employees. This would minimize the need for hiring new personnel. There are, however, detrimental aspects to this approach. Consultants and insurance carriers are not that familiar with the aluminum industry and may not have an adequate understanding of the OSHA standards. The use of Reynolds employees would shorten the learning curve and assure the quality of the audits. Moreover, consultants and insurance carriers would not assist with the other safety and industrial hygiene tasks that must be addressed.