PLAINTIFF'S EXHIBIT

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Minimum Requirements For An Effective Safety Program



United States Steel Corporation

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For
An Effective Safety Program



United States Steel Corporation
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MANAGEMENT ACCOUNTABILITY ELEMENTS

MINIMUM REQUIREMENTS FOR AN EFFECTIVE SAFETY PROGRAM

I. The responsibility for safety is vested in line management with each level of line management being accountable to its superior for safety performance. The safety responsibilities of line management are met when the functions of safety administration, control, and training are performed systematically and continuously to the end that acceptable performance standards are met.

II. Since line management is accountable for safety performance, such performance becomes a measure of their management capabilities. Therefore, the specific requirements at each level of management are set forth to develop a clear understanding of how these functions are coordinated to provide an integrated Safety Program.

III. In the statements of responsibility, the management titles used were selected on the basis of common usage within the Corporation. In order that they may be uniformly interpreted in all operations, the following definitions are provided:

A. EXECUTIVE OFFICER—The Vice President or General Manager responsible for all plants of an operating group, a division, or an associated subsidiary.

B. PLANT MANAGER—The individual responsible for all units of an operation, such as a plant, mining district, construction district, warehouse, etc.

C. DIVISION SUPERINTENDENT—The individual responsible for more than one operating department within a plant or a works location.

D. DEPARTMENT HEAD—The individual responsible for related operations which comprise a section of a division or plant.

E. GENERAL FOREMAN—The individual responsible for an assigned area within a department or operation and who supervises and coordinates the activities of Foremen.

F. FOREMAN—The individual who comprises front line management and who is in constant, daily contact with production and maintenance workers.

G. SUPERINTENDENT–PERSONNEL SERVICES—The individual responsible for the staff administration and coordination of all personnel services functions at an operating location.

H. GENERAL SUPERVISOR–SAFETY—The individual responsible for the staff coordination of the local safety activities.

I. SAFETY ENGINEER—The individual who provides safety staff services within a unit or units of an operation and who reports to the General Supervisor–Safety.

PLANT MANAGER

The responsibility for the plant's safety performance is vested in the Plant Manager who is accountable to an Executive Officer.

The Plant Manager is responsible for:

I. Establishing and administering the Corporation Safety Program in the plant in keeping with predetermined objectives.

II. Establishing controls to assure uniform department performance in compliance with Safety Program elements.

III. Establishing a training program which will develop in each member of management a strong safety attitude and a clear-cut understanding of specific duties and responsibilities.

A. Administrative Functions

1. Adopts and enforces established safety rules and regulations.
2. Approves all plant safety rules and regulations.
3. Adopts and installs Awareness Charts.
4. Adopts standards for identification of utilities throughout the plant.
5. Requires each department to identify and guard or eliminate areas of injurious contact.
6. Approves procedure for issuance of protective apparel in accordance with established policy.
7. Adopts Job Safety Analysis and sees that it is properly utilized.
8. Adopts a plant-wide housekeeping inspection program and participates monthly in the inspection of an assigned area.
9. Reviews daily the plant safety performance for the past 24 hours and discusses problems with staff.
10. Holds one formal safety meeting per month with staff including the General Supervisor–Safety.
11. Cancels, in the event of a fatality or major catastrophe, other activities and proceeds to scene.
12. Serves as chairman of committee investigating all fatal accidents and major catastrophes.
13. Defines geographic areas within works location which delineate responsibilities for housekeeping.
14. Maintains effective and prompt safety communication through line organization to all management members.
15. Assigns management help, where needed, to improve safety performance.
16. Maintains individuals in all plant management positions who have demonstrated their ability to effectively administer Safety Program elements.
17. Instills, by action and example, a sincere safety attitude through all levels of management.
18. Establishes a plant-wide plan for emergency or first aid treatment of sick or injured employees.
19. Requires a safety inspection by operating, engineering, and safety personnel before new equipment is placed in operation.

B. Control Functions

1. Reviews monthly records of plant's safety activities.
2. Makes necessary field audits with the General Supervisor–Safety to appraise Program's effectiveness at department level.
3. Reviews annually the plant's adherence to Corporation Safety Program to determine effectiveness and need for changes to improve performance.
4. Insures that all Superintendents meet the minimum requirements of the Corporation Safety Program.
5. Approves list of critical occupations for which periodic physical examinations are required.

C. Training Functions

1. Develops a strong attitude of safety responsibilities and a thorough understanding of predetermined safety objectives.
2. Provides for coordination of Job Safety Analysis
3. Evaluates the staff's safety performance and provides guidance and training, where needed, to improve performance.
4. Makes safety contacts with staff members.

DIVISION SUPERINTENDENT

In operations where the position of Division Superintendent is not used, these responsibilities and functions will be assumed by the Department Head in addition to those described for that position.

The responsibility for the safety performance of a division of a plant is vested in the Division Superintendent who is accountable to the Plant Manager

(Continued)

DIVISION SUPERINTENDENT (Continued)

The Division Superintendent is responsible for:

I. Administering the division safety activities in keeping with the Corporation Safety Program and objectives.

II. Maintaining adequate controls to assure that the Corporation Safety Program requirements are met.

III. Establishing a training program which will develop in each member of management a strong safety attitude and a clear-cut understanding of specific duties and responsibilities.

A. Administrative Functions

1. Reviews daily the division safety performance for the past 24 hours and discusses with Department Heads.
2. Contacts each Department Head daily on safety activity matters.
3. Conducts a regularly scheduled staff safety meeting at least twice a month.
4. Serves as chairman of committee investigating accidents resulting in disabling and serious nondisabling injuries and near serious accidents.
5. Defines geographic areas which delineate Department Heads' responsibilities for maintenance and inspection of facilities.
6. Communicates promptly all matters pertaining to safety through line organization.
7. Cancels, in event of a serious accident, all other activities and proceeds to scene of accident.
8. Enforces established safety rules and regulations and approves division safety rules before submitting to Plant Manager.
9. Analyzes problem areas and assigns staff or operating assistance as needed.
10. Evaluates departmental safety performance monthly.
11. Reviews monthly with Plant Manager the division Safety Activity Reports.
12. Maintains an effective "chain of command" so that the Corporation Safety Program is uniformly applied throughout the division with prompt action being taken on safety matters at the lowest responsible level of management.
13. Makes periodic checks on utility identification for compliance with plant standards.
14. Maintains identification and guarding or elimination of injurious contact areas.
15. Establishes standards for the uniform issuance and use of protective apparel in accordance with plant requirements.
16. Adopts a plan for indoctrination of new or transferred employees to insure thorough understanding of job safety requirements.

B. Control Functions

1. Reviews records of division safety activities and evaluates safety performance monthly.
2. Makes field audits to observe Safety Program's effectiveness.
3. Makes monthly housekeeping and facility inspections.
4. Attends departmental safety meetings periodically to audit effectiveness.
5. Prepares monthly Safety Activity Report and submits to Plant Manager with copy to the General Supervisor–Safety.
6. Utilizes Awareness Charts in accordance with overall Program.
7. Reviews reports of participation in Job Safety Analysis conferences to check on adequate employee coverage.

C. Training Functions

1. Maintains individuals in all division management positions who have demonstrated their ability to administer the Safety Program effectively.
2. Arranges for safety training tailored to division needs.
3. Participates in the development and execution of plant safety training activities.
4. Instills, through action and example, a sincere safety attitude in all levels of management.
5. Provides guidance to Department Heads, where needed, to improve performance.
6. Instructs Department Heads in procedure for care and treatment of sick or injured employees.

DEPARTMENT HEAD

I. The responsibility for the safety performance of a department is vested in the Department Head who is accountable to the Division Superintendent for the capabilities of individual members of the department organization and for the department organization as a whole (Where Department Head reports to the Plant Manager, the accountability is then to the Plant Manager.) *(Continued)*

DEPARTMENT HEAD (Continued)

II. The minimum requirements will be met when the Department Head fulfills the administrative, control, and training functions listed below. (Where Department Head reports to Plant Manager, administrative, control, and training functions of Division Superintendent are also assumed by this level of management.)

A. Administrative Functions

1. Contacts each General Foreman daily on safety.
2. Holds a safety meeting weekly, covering each member of department management at least once a month.
3. Makes daily observations of General Foremen's safety activities.
4. Reviews and approves all job procedures growing out of Job Safety Analysis; installs approved Safe Job Procedures; requires each General Foreman to check on use of Safe Job Procedures; and reviews weekly schedule of job element analyses.
5. Maintains Awareness Charts for Unsafe Acts, Violations, Violations—Lack of Instructions, and Injuries; reviews monthly and keeps current.
6. Approves all departmental safety rules and regulations, and Safe Job Procedures, and reviews annually; maintains strict enforcement; and develops plan to insure employee instruction and reinstruction.
7. Establishes acceptable housekeeping standards, defining areas of responsibility; assigns areas to General Foremen; makes daily spot check of some area; holds formal inspection at least once per month with General Foremen; submits written report to Division Superintendent with assignments and deadlines for correction; and makes inspections with Safety Engineer.
8. Purchases and/or fabricates tools and equipment to comply with plant specifications and consults with Metallurgical and/or Engineering Departments as required.
9. Establishes standards and schedules of inspection for chains, wire rope, slings, clevises, pins, hooks, spreaders, etc.
10. Develops standards and schedules the inspection of powered material-handling equipment.
11. Reviews crane inspection reports; makes spot check of field conditions; and, with Superintendent of Maintenance, establishes a sound schedule for physical, mechanical, and electrical inspection of all department cranes at least once a month, showing time of inspection and inspecting personnel.
12. Schedules surveys to assure complete identification of utilities.
13. Surveys pinch points; takes immediate action to eliminate or guard pinch points; and resurveys work areas for pinch points whenever a change in equipment, process, or method is made.
14. Develops an indoctrination plan for new or transferred employees which includes specific job instruction, issuance of protective apparel, and follow-up checks by Foremen and General Foremen.
15. Develops and submits to the plant Medical Department, in accordance with plant procedure, a list of employees who are to receive periodic physical examinations.
16. Adopts standards for assigning protective apparel to employees; insists upon strict enforcement; and makes spot field checks to determine compliance.
17. Reviews Job Safety Analysis reports to assure continuous activity.
18. Reviews daily the safety performance for the past 24 hours and discusses with General Foreman; and provides a medium whereby the Safety Engineer can meet with him daily or as required.
19. Personally reviews all nondisabling injuries with injured and injured's Foreman.

B. Control Functions

1. Maintains the following records to assure compliance with minimum requirements:
   a. Awareness Charts;
   b. File of Foremen's Safety Activity Reports;
   c. File of completed Employee Record cards;
   d. Occupation file containing Foreman's Accident Reports and Supervisor's Safety Observation Reports (for use in analyzing adverse trends that appear on Awareness Charts); and
   e. Inspection Reports.
2. Evaluates General Foremen's safety performance monthly.
3. Submits report of safety activities monthly to Division Superintendent.

C. Training Functions

1. Adopts a training plan which will develop, in each member of management, strong safety attitudes and a clear-cut understanding of specific duties and responsibilities.
2. Instills, by action, example, and training, a sincere safety attitude through all levels of management.
3. Instructs General Foremen in plant procedures for the care and treatment of sick or injured employees.

GENERAL FOREMAN

I. The responsibility for the safety performance of an assigned department area and the training and development of each Foreman is vested in the General Foreman who is accountable to the Department Head.

II. The minimum requirements will be met when the General Foreman fulfills the administrative, control, and training functions listed below.

A. Administrative Functions

1. Makes one individual safety contact per day with each Foreman and sees that Foremen meet the minimum requirements for safety contacts.
2. Makes one safety observation per day of Foremen's safety activities.
3. Arranges for development of Job Safety Analyses; reviews all Job Safety Analyses; and submits to Department Head for approval.
4. Reviews Awareness Charts for assigned work area, taking the necessary correction action.
5. Checks Foremen monthly on knowledge of safety rules and regulations; keeps safety rules up to date; and enforces all safety rules and regulations.
6. Develops a workable housekeeping program, defining areas assigned to Foremen; makes daily spot checks of an assigned work area; makes weekly housekeeping inspections accompanied by Foremen, reporting results of inspections to Department Head and indicating conditions and corrective action; and maintains safety signs and bulletin boards in assigned area in clean and legible condition.
7. Develops a workable tool inspection schedule and is accountable for the availability and condition of tools; establishes standards for tool use; reviews Foremen's tool reports monthly; makes weekly spot checks of tools in assigned work area; and reports to Department Head all deviations from specifications, premature failure, or unsafe tool problems.
8. Develops a workable inspection schedule for wire rope, chains, clevises, pins, spreaders, etc., and accounts for the availability and condition of such equipment; establishes standards as to acceptable conditions; and makes weekly spot checks.
9. Develops a workable inspection schedule for powered material-handling equipment and accounts for its enforcement; assigns specific pieces of equipment to Foremen for weekly inspection for unsafe conditions; and spot checks weekly to insure compliance with standards.
10. Makes cranes available for inspection and assigns specific cranes to Foremen for biweekly inspection for housekeeping and condition
11. Maintains identification of utilities in assigned work area according to plant standards.
12. Instructs Foremen in the recognition and elimination of pinch points and takes immediate action to eliminate or guard pinch-point situations referred by Foremen.
13. Instructs Foremen in indoctrination of new or transferred employees and reviews check list completed by Foremen.
14. Schedules employees for physical examination as required; sees that Foremen make such employees available as scheduled; and keeps Foremen advised of employees' physical limitations as reported by plant Medical Department.
15. Develops, by occupation, protective apparel required; checks on Foremen's enforcement activities; makes spot field checks to determine compliance.
16. Reports all injuries or illnesses of employees to Department Head as soon as practical; reviews Foreman's Accident Reports with Foremen; and, in case of injury, submits report to Department Head after taking corrective action and before leaving plant.
17. Makes thorough investigation of all accidents and near serious accidents occurring to employees in assigned work area; and makes personal inspection.

B. Control Functions

1. Checks safety performance for the past 24 hours; discusses with Foremen; and reports to Department Head.
2. Makes daily spot checks for housekeeping, unsafe conditions, Unsafe Acts, Violations, condition of tools, ladders, wire rope, chains, clevises, pins, etc., and adherence to safety rules and Safe Job Procedures.
3. Reviews promptly Foreman's Accident Reports.
4. Reviews promptly Foremen's check lists of indoctrinated employees.
5. Reviews Foremen's safety activities weekly to determine that minimum standards are being met.
6. Appraises the safety capabilities of Foremen monthly; makes housekeeping inspection with Department Head; reviews Foremen's safety activities, using Awareness Charts; reviews reports of powered material-handling equipment, tools, cranes, etc., and reviews Foremen's activities in Job Safety Analysis.

C. Training Functions

1. Instructs Foremen in specific safety duties and responsibilities.
2. Attends scheduled and assigned training meetings
3. Instructs Foremen in their responsibilities for the care and treatment of sick or injured employees,

FOREMAN

I. The responsibility for the safety of assigned employees and the safe condition of the assigned work area is vested in the Foreman who is accountable to the General Foreman.

II. The minimum requirements will be met when the Foreman fulfills the administrative, control, and training functions listed below.

A. Administrative Functions

1. Each employee to receive at least one individual Safety Contact a week.
2. Each Foreman shall:
   a. Enforce Safe Job Procedures as developed by Job Safety Analyses.
   b. Report weaknesses in Job Safety Analyses as revealed by Safety Observations to General Foreman.
   c. Report jobs not covered by Safe Job Procedures.
   d. Participate in Job Safety Analysis conferences.
3. Instructs each employee in all Safe Job Procedures pertaining to assigned work, and records instruction.
4. Makes at least one Safety Observation per day, with each employee being observed twice a month.
5. Reviews accident causes as shown on Awareness Charts and directs daily safety activities to correct these causes.
6. Conducts weekly instruction of employees in Safe Job Procedures, safety rules and regulations; records instruction; and enforces all Safe Job Procedures, safety rules and regulations at all times.
7. Makes daily inspections of assigned work area and takes immediate steps to correct unsafe or unsatisfactory conditions; reports to General Foreman conditions which cannot be immediately corrected; instructs employees on housekeeping standards; and requires Maintenance or Service employees to maintain these standards while in assigned work area.
8. Instructs employees that tools are to be inspected before each use; makes daily spot checks of tool conditions; inspects each tool in assigned work area monthly; uses a check list for recording tool inspections; and submits check list to the General Foreman, noting type of defect and action taken.
9. Instructs employees in visual inspection before using wire rope, slings, chains, clevises, pins, spreaders, etc.; makes spot checks daily of such devices in service; inspects weekly each such device in assigned work area, and reports to General Foreman
10. Requires powered mobile material-handling equipment operators to submit reports at the end of each turn; reviews reports and takes prompt corrective action; transmits reports to General Foreman with comments on action taken; and inspects such equipment weekly in assigned work area.
11. Requires crane operators to submit reports at the end of each turn; reviews reports; takes corrective action; and submits reports to General Foreman with comments and action taken. Maintenance Foreman will be assigned specific cranes for inspecting weekly. Operating Foreman makes cranes available for maintenance inspection; requires craanemen to report crane collisions or severe contact with runway bumpers; and takes such cranes out of service until inspection is made.
12. Maintains the identification of utilities in assigned work area according to plant requirements.
13. Takes action leading to the elimination or guarding of pinch points.
14. Instructs personally each new employee in assigned work area on job safety requirements; completes check list promptly; and forwards it to General Foreman.
15. Enforces the plant Medical Department's recommendations with respect to employees' physical limitations; reports employee's apparent physical limitations to General Foreman; and requests physical examination.
16. Enforces wearing of protective apparel; makes spot checks to determine that protective apparel is being used; and makes periodic checks to appraise condition of apparel.
17. Sees that injured employee receives prompt medical attention; isolates area or shuts down equipment as necessary; and immediately reports to the General Foreman the facts regarding employee's accident or illness and action taken. In near serious accident cases, Foreman determines cause; takes immediate steps to correct condition; and isolates area and/or shuts down equipment, as necessary. Foreman immediately reports facts and action taken to the General Foreman.
18. Makes thorough investigation of all accidents, near serious accidents, and medical cases occurring to employees in assigned work area. Immediately after the accident and before leaving plant, he prepares a complete Foreman's Accident Report for the General Foreman.

B. Control Functions

1. Checks, at the start of each turn and before relieving the on-duty Foreman, changes in operating prac-

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tices, procedures, and conditions, noting facts related to safety which have occurred since last turn worked.

2. Makes, at the start of each turn, an immediate check to determine absentees. If plant injury is claimed, an immediate investigation is instituted and General Foreman notified.

3. Makes daily spot checks and takes the necessary corrective action regarding housekeeping, Unsafe Acts, Violations, unsafe conditions, tools, ladders, wire rope, chains, clevises, pins, spreaders, etc., and adherence to safety rules and Safe Job Procedures.

4. Reviews crane operators' inspection reports daily and takes necessary action.

5. Reviews powered material-handling equipment operators' inspection reports daily and takes necessary action.

6. Submits to General Foreman a written report monthly of inspections of tools, ladders, and wire rope, chains, clevises, pins, spreaders, etc.

C. Training Functions

1. Attends all scheduled and assigned safety training meetings.

2. Instructs personally or provides on-the-job instruction to employees in safe and efficient performance of assigned jobs.

3. Participates as assigned in Job Safety Analysis Conferences.

SUPERINTENDENT–PERSONNEL SERVICES

The responsibility for the plant's safety performance is vested in line management. The responsibility for the quality of advice and counsel provided line management by safety staff services is vested in the Superintendent–Personnel Services.

The Superintendent–Personnel Services is responsible for:

I. Establishing, developing, and administering an adequate safety organization.

II. Establishing lines of communication to assure direct personal contact between the General Supervisor–Safety and all levels of plant management.

III. Maintaining plant training activities which will develop, in each member of management, a clear-cut understanding of the safety responsibilities established by the Corporation Safety Program.

A. Administrative Functions

1. Provides an adequate safety organization.

2. Informs the General Supervisor–Safety of changes in rate of operations, movement of personnel, and other matters affecting safety performance.

3. Establishes direct contacts between the General Supervisor–Safety and all levels of plant management.

4. Encourages personal contacts between the General Supervisor–Safety, Division Superintendents, and Department Heads.

5 Determines impact of plant grievances on plant safety activities and informs the General Supervisor –Safety.

6. Provides general supervision over plant safety promotional work.

7. Provides guidance to the General Supervisor–Safety in the development of plant safety procedures.

8. Provides guidance on safety matters and in the development of plans for carrying out procedures.

9. Promotes plant adoption of all elements of the Safety Program.

10. Correlates safety objectives, employment practices, and medical services.

B. Control Functions

1. Reviews monthly report of plant safety activities.

2. Reviews monthly training activities as they relate to the Safety Program.

3. Audits the effectiveness of safety organization in administering Safety Program.

4. Audits effectiveness of plant safety organization as individuals and as an integrated group.

C. Training Functions

1. Provides individual guidance and counsel to the General Supervisor–Safety.

2. Correlates Safety Program objectives with plant training program.

3 Maintains individuals in plant safety organization who have demonstrated their ability to administer and coordinate the Safety Program.

GENERAL SUPERVISOR–SAFETY

I. The General Supervisor–Safety, upon delegation by the Superintendent–Personnel Services, advises and counsels with the Plant Manager in promoting, coordinating, and evaluating the safety activities.

A. Administrative Functions

1. Collaborates on a scheduled basis with the Plant Manager in appraising the performance of all departments.

2. Reviews with the Plant Manager the plant accident experience for the past 24 hours; and collaborates on recommendations and action to be taken by respective departments.

3. Develops recommendations for improvement of procedures, practices, and activities involved directly or indirectly in effective execution of safety functions by plant management.

4. Applies established safety procedures, practices, and related matter.

5. Provides Department Head with safety procedures, manuals, directives, and other required information relative to safety; and advises with regard to their proper administration.

6. Makes available, in the event of breakdowns or other plant emergencies, necessary services, recommendations, and preventive action as may be required.

7. Collaborates with line management in the development of required revisions to existing procedures, rules, and regulations, and submits proposed changes to Plant Manager for approval.

8. Maintains membership in necessary outside safety organizations.

9. Takes part in the review of all near serious accidents and disabling injuries and fatalities.

10. Collaborates with Plant Manager in the development and preparation of plant monthly safety meeting agendas.

11. Advises Plant Manager immediately of fatal and near serious accidents occurring in other plants; aids in the development of procedures; and takes action as may be required locally. Information attendant to such accidents is communicated promptly to Division Superintendents concerned for their action.

12. Develops and maintains an effective safety publicity program, and, when required, enlists the services of the Corporation Headquarters Safety organization

13. Serves as a member of plant committees for special safety studies and surveys.

14. Collaborates with Division Superintendents and Department Heads to discuss problems and offer advice.

15. Consults with the plant Engineering Department on original plans; sees that all plans and specifications for new or proposed changes in processes, equipment, or methods are reviewed for compliance with safety standards before acceptance or use; and collaborates with the plant Medical Department where such plans and/or specifications pertain to health standards.

16. Establishes routines for testing and evaluating protective apparel.

17. Collaborates with department management in the administration of the physically handicapped procedure and the assignment of such employees in accordance with established practices.

18. Collaborates with the plant Engineering Department regarding contractors' safety requirements.

19. Investigates potential health hazards in collaboration with the plant Medical Department.

B. Control Functions

1. Reviews reports of plant safety activities with the Plant Manager.

2. Makes field appraisals with the Plant Manager to observe the Program's effectiveness.

3. Supervises audit of plant locations by Safety Engineers.

4. Reviews plant Awareness Charts; evaluates; advises on adverse trends; and recommends plant surveys as necessary.

5. Approves initial purchase orders for protective apparel, such as goggles, respiratory gas masks, leggings, gloves, safety belts, safety shoes, etc.

6. Reports all disabling injuries to Corporation Headquarters Safety office within 24 hours of occurrence.

7. Arranges for preparation of statistical reports of safety performance and activities and for distribution to all plant management.

C. Training Functions

1. Coordinates the training activities of Job Safety Analysis

SAFETY ENGINEER

I. It is the responsibility of the Safety Engineer to provide to all levels of management within a division or department, all service and technical advice needed for administration of the Safety Program and to utilize controls to assure continued effective application of the Safety Program.

A. Administrative Functions

1. Serves as liaison between the General Supervisor–Safety and the departments to which he is assigned.
2. Develops and maintains knowledge of facilities, equipment, processing, products, changes of product mix, materials handling and management personnel in assigned area.
3. Maintains knowledge of Corporation Safety Program, published safety literature, Corporation and plant safety manuals, rules and regulations and other communications; advises departmental management of such applicable safety communications and of related conditions requiring attention.
4. Makes first contact at lowest level of line supervision responsible for correction; and follows up, if necessary, with higher level departmental contacts until necessary corrections are made.
5. Assists and advises departmental management in proper administration of the Safety Program including:
   a. Job Safety Analysis and Safe Job Procedures
   b. Job Safety Analysis Review Conferences
   c. Basic Training
   d. Individual Contacts
   e. Safety Contact Cards
   f. Safety Observations
   g. Employee Records
   h. Accident Investigation
   i. Awareness Charts
   j. Physical Conditions and Inspections
   k. Activity Reports
   l. Audits
6. Discusses complaints and suggestions received concerning conditions and equipment with the respective General Foremen.
7. Assists in testing and evaluating protective apparel.
8. Assists the General Supervisor–Safety in the development of:
   a. Safety publicity and promotional programs;
   b. Special safety reports for the Plant Manager or Headquarters Safety staff.

B. Control Functions

1. Reviews daily the injury experience for the past 24 hours.
2. By daily observation of physical conditions and work practices, detects lack of conformance with the Safety Program and follows up with appropriate department management.
3. Makes thorough analysis of injury and safety activity statistics and inspection reports, delineates problem areas, and makes recommendations for solutions.
4. Conducts independent audits to observe conformance with established Safety Program and to determine the effectiveness of safety activities; reports results and recommendations to Department Head.
5. Reviews protective apparel requirements with Foremen and General Foremen.
6. Reviews adequacy of safety rules and regulations with Department Head.
7. Periodically follows up the assignment of physically handicapped employees to assure compliance with the recommendations of the plant Safety and Medical staffs.

C. Training Functions

1. Promotes departmental on-the-job safety training.
2. Advises the General Supervisor–Safety concerning safety training needed in assigned area and assists in the development of such programs.

BASIC SAFETY PROGRAM

"Safety program" is the term used to describe the whole of safety activities. It is a combination of many separate acts and responsibilities in which organized leadership and proper application of each element of the over-all program are essential to the attainment of safety performance consistent with safety objectives. Since all operating units are not at the same level of safety activity, these elements have been set forth in a sequence which will permit logical advancement of the basic safety activity to accomplish maximum improvement in safety performance.

* Revised March 13, 1968

ELEMENTS OF A SAFETY PROGRAM

I. SAFETY RESPONSIBILITY

A. The purpose is to emphasize the concept that line management is responsible for the safety and health of the work force in the same manner and degree that it is responsible for the Corporation's physical assets.

B. Safety responsibilities, therefore, must be fully exercised by each level of management, beginning with the President and extending in a continuous and unbroken "chain of command" to the individual Foreman. Safety functions shall be performed at the lowest responsible level of management with higher levels of management providing leadership and guidance and utilizing controls to assure that safety responsibilities are effectively administered. To this end, management safety training courses shall be conducted to acquaint each member of management with his part in the safety program and its relationship to the responsibilities of other management levels.

II. INVESTIGATION OF ACCIDENTS (Injury Investigation)

A. The purpose is to establish plant management's responsibility in the complete and thorough investigation of each fatal, disabling, and nondisabling injury, and near serious accident to determine cause and to take such action as may be necessary to prevent a recurrence.

B. INVESTIGATION PROCEDURES

*1. Fatalities and Other Extremely Serious Accidents

It is imperative that a fatal injury be investigated as soon after the accident as circumstances will permit. The Foreman will ascertain the available facts at once. The Safety Engineer will also make an investigation. The General Supervisor of Safety will be notified at once and will secure, as soon as possible, all available information pertinent to the accident prior to the formal investigation by the committee charged with that responsibility. The Division or Associated Subsidiary Safety Office shall be advised promptly of fatal and other extremely serious accidents and, in turn, shall promptly advise the Corporation Director of Safety by phone.

Nothing is to be disturbed except to remove the injured person or to secure equipment and prevent further damage until the General Supervisor of Safety or his representative gives approval to restore conditions to normal.

a. Personnel of Fatal Accident Investigating Committee

(1) The Plant Manager shall preside as chairman. Additional members shall be selected from the plant management organization or as required by law or contract.

b. Procedure for Fatal Accident Investigating Committee

(1) The committee shall develop the following information:

*(a) Name of injured, occupation, date and time of accident, nature and extent of injury, department, plant, home address, corporation and job service.

(b) Description of accident. (What was injured man doing? Where? What occurred?)

*(c) Unsafe actions by injured or by other persons. (Was each unsafe action an accepted practice? If any of the unsafe actions were violations

safety rules or instructions, quote the rule, instruction, or applicable portion of the rule or instruction violated.)

*(d) Length of time practice and/or unsafe condition existed. (Had it been reported before this accident? By whom? To whom? What steps had been taken to eliminate it? Why was it not completely corrected? Has a similar accident occurred before?)

(e) Safety instruction injured received and plant and occupational experience. (If other persons performed acts which contributed to or caused the accident, state what safety instructions they had received and their plant and occupational experience.)

(f) Physical or mechanical conditions contributing to accident.

*(g) Safe Job Procedure (Job Safety Analysis). (Was the operation or element involved covered by safe job procedure?)

*(h) Responsibility for occurrence. (The injured, other worker, or management. On what grounds is this finding made?)

*(i) Management's action to prevent similar accidents. (State the management, individual or individuals who shall be responsible for carrying out the recommendations and deadline for completion. If the recommendations include employee instruction or the preparation of Safe Job Procedures, a copy of the Safe Job Procedures, when prepared, shall be attached to and made a part of the report.

c. Report of Fatal Accident Investigating Committee

(1) When all witnesses have been questioned, the committee shall summarize its findings and recommendations in a written report. The complete report should include a copy of the "Safety Engineer's Accident Report" and the "Foreman's Accident Report".

*(2) The report shall be duplicated with sufficient copies to provide each participating member of the plant committee and each member of the Corporation Review Committee with a copy for his use during the Corporation review as set forth in Item "d" below. Members of the Corporation Review Committee may retain their copy of the plant report, however, all other copies shall be returned to the General Supervisor of Safety for preparation of the "4-Day Report".

*d. Corporation Review Committee

(1) Within 24 hours a detailed on-the-spot verification of the findings and recommendations of the plant committee will be made by a corporation-level group including as a minimum the Director of Safety and the General Manager and Chief Engineer of the operation.

*(2) A copy of the "4-day report" will then be sent to the Division or Associated Subsidiary Safety Office, which office shall forward the report to the Corporation Director of Safety.

*(3) Copies of "4-day report" should be sent to the committee members and others at the plant such as the plant Engineering Department when design of equipment is involved.

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2. Disabling and Temporary Partial Injuries (Except Fatalities)

   a. A formal investigation must be held following fatal accident investigation procedures except that the chairman may be a Division Superintendent or a Department Head.

   b. The reporting procedures shall be the same as on "fatalities" with the "4-day report" forwarded to the Corporation Director of Safety.

3. Nondisabling Injuries

   a. Following treatment at the plant emergency hospital, the Foreman should at once:

      (1) Secure authority from the plant Medical Department before allowing injured man to return to work.

      (2) Question injured man in detail regarding the accident.

      (3) Visit the scene of the accident and have injured employee describe the accident in detail. Question all witnesses and determine the cause of the accident.

      (4) Fill out the "Foreman's Accident Report".

      *(5) If the accident resulted from an unsafe condition, immediate steps should be taken to correct the condition. If the accident resulted from an unsafe action, specific instructions as to the proper method for doing the work should be issued to injured employee or employees. These instructions should be followed up by making Foremen safety observations, and entering these on employee record cards indicating that all employees engaged in similar work have been acquainted with the practice and the proper method of doing the job.

      *(6) Sufficient copies of the "Foreman's Accident Report" should be made to meet the requirements of each department and division. Copies of the report should be forwarded immediately to the department office and the original to the plant Safety Department.

      (7) The Safety Engineer will also make an investigation.

      *(8) The Department Head personally reviews all serious or potentially serious nondisabling injuries with injured and injured's Foreman.

      *(9) If, in the opinion of the General Supervisor of Safety, a formal investigation should be held, he shall so recommend to the Department Head.

*4. Near Serious Accidents

The term, "near serious accident", is applied to an occurrence which does not cause personal injury but comprises serious accident potential and to nondisabling injuries with serious potential. Such occurrences should be investigated in the same manner as disabling injuries. A "4-day report" should be sent to the Corporation Safety Office of accidents in this category.

III. TREATMENT OF SICK AND INJURED EMPLOYEES

A. The purpose is to establish a uniform plan for the prompt and adequate treatment of all sick or injured employees and for the prompt, considerate, and courteous notification of injured's family.

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*B. Employees shall be required to report promptly to their Foreman all injuries, no matter how slight. All injured employees or those who become ill while at work shall be sent by their Foreman to the plant Medical Department or to such other medical center as has been designated. Under no circumstance should the Foreman permit injured employees to return to work without the authority of the plant Medical Department.

C. If the plant Medical Department considers that injured employee is unable to return to his regular job but can perform a major part of the job or is able to work at some other regularly established job without aggravating his injury, such assignment can be made upon request from the Department Head and approved by the General Supervisor of Safety. If no suitable work is available, injured employee shall be sent home.

D. The family of an employee who is ill, fatally injured, or injured to the extent that he must be retained in the hospital beyond the end of his shift or sent to a general hospital shall be notified promptly.

E. The General Supervisor of Safety shall be notified immediately of all disabling and probable disabling injuries, preferably before injured man is removed to a general hospital or to his home.

F. Plant telephones should be equipped with placards showing the ambulance and fire department telephone numbers.

IV. SAFETY MEETINGS

A. The purpose of a safety meeting is to promote safety-consciousness through safety education. This requires an established schedule of safety meetings, with each meeting planned in advance so that maximum audience participation is assured, important subjects adequately covered, conclusions reached, and course of action determined.

B. The Plant Manager shall conduct a safety meeting at least once a month with his staff members including the General Supervisor of Safety. The agenda for these meetings shall include:

1. Evaluation and promotion of safety activity.
2. Report of pertinent safety items discussed at operating meetings.
3. Review of important safety observations since last meeting, such as:
   a. Violations of safety rules and regulations.
   b. Safety statistics.
   c. Disabling and nondisabling injuries and near serious accidents.
   *d. Unsafe conditions, and unsafe actions.
4. Discussion of safety problems and preventive measures.
5. Discussion of other safety matters.

C. The Division Superintendent shall conduct a safety meeting with his staff members, including a safety representative, at least twice a month. The agenda for these meetings shall be patterned after the Plant Manager's meeting and shall include a review of each Department Head's safety activity.

D. Safety meetings at the department level shall be conducted weekly by the Department Head and shall include management members reporting to the Department Head as well as maintenance management assigned to the work area. Such meetings shall be scheduled to assure attendance by each member of management at least once a month. The agenda for these meetings shall include:

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1. Reading of minutes of preceding meeting.

*2. Discussion of all serious or potentially serious accidents occurring within the department and pertinent accidents occurring in other departments and plants.

3. Discussion of delayed treatment cases.

4. Review of housekeeping, equipment changes, and unsafe conditions.

*a. Items finished since last meeting.

*b. Unfinished items progress report and scheduled completion dates.

*c. New items and scheduled completion dates.

5. Evaluation of department's safety activity, including number of group meetings, number present, and number of individual contacts and safety observations made.

*6. Review of unsafe actions.

7. Check of status and promotion of application of all elements of the safety program.

*E. Minutes of safety meetings at plant, division, and department level shall be filed in the respective offices, and one copy forwarded to the General Supervisor of Safety to the end that improvements in safety programming may be guided by adequate records and statistics.

F. Minutes of the Plant Manager's meeting shall be distributed to all Division Superintendents. Minutes of the Division Superintendent's meeting shall be distributed to all Department Heads. Minutes of the Department Head's meeting shall be distributed to all members of department management. These minutes will serve as a guide and information source in conducting group meetings or in making individual safety contacts.

*G. An effective means for putting safety across to the individual employee is for the Foreman to supplement their individual contacts by contacting their men in small groups. When the Foremen elect to use small group meetings, these meetings should cover such subjects as safety rules, safe practices, specific job hazards, accidents pertinent to the operations, delayed treatment cases, and safety suggestions.

V. SAFETY RULES AND REGULATIONS

A. The purpose is to secure uniformity, avoid misunderstanding, prevent accidents, and promote effective safety performance.

B. The general safety rules applicable to all employees are entitled "General Safety and Plant Conduct Rules and Regulations". Each employee should have a copy and each new employee should be furnished a copy.

*C. Each employee should have a copy and Foremen should question all employees under their supervision frequently on their knowledge of general and special purpose safety rules. Foremen and employees performing maintenance or service work should be familiar with the safety requirements of the departments in which they work. Special-purpose safety rules, such as mobile cranes, etc., shall be provided to operators of this type of equipment.

D. Rules and regulations should be revised from time to time and new rules adopted to meet existing conditions.

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VI. PROTECTIVE APPAREL

A. The purpose of protective apparel, when required, is to minimize hazards inherent to the job. The use of protective apparel shall be accompanied by a uniform plan for determination of the type and amount required.

B. The General Supervisor of Safety shall approve all initial requisitions for protective apparel, such as goggles, respirators, gas masks, leggings, gloves, safety belts, safety shoes, etc.

VII. DESIGN AND INSPECTION OF EQUIPMENT

A. The purpose is to assure that facilities are designed and maintained in accordance with accident experience and established safety standards.

B. It is the responsibility of the plant Engineering Department to check drawings of new equipment for safety. The plant Engineering Department shall also check designs for safety whenever repair work involves changes, additions, or alterations to existing equipment. The engineers should consult frequently with the General Supervisor of Safety who, in turn, should keep them informed of accidents following failures or deficiencies of equipment and of new developments in safety standards, including Corporation safety requirements, Division and plant safety rules and regulations, and state and municipal safety rules and codes.

C. Appropriation requests pertaining to health and safety or changes in facilities should be referred to the General Supervisor of Safety to check for compliance with statutory, Corporation, and Division requirements. When the appropriation request pertains to health, the General Supervisor of Safety will collaborate with the plant Medical Department in determining compliance with requirements.

D. The plant Safety Department should be notified of all new equipment received or being installed in order that a safety inspection may be made to determine if it is safe to operate. New or modified machinery shall not be operated or new processes put into effect until approved by the plant Safety Department in collaboration with representatives of the plant Engineering, Maintenance, and Operating Departments.

E. The General Supervisor of Safety or his representative shall request changes or repairs to equipment, when necessary, to comply with rules and regulations. A form should be established for this purpose which would be completed in triplicate (one copy to be retained by the plant Safety Department and two copies forwarded to the Department Head). When the work is completed, the Department Head shall return one copy to the plant Safety Department showing that the work has been finished. The General Supervisor of Safety or his representative shall follow up all recommendations until completed. In cases of disagreement between the plant Safety Department and the Department Head as to the recommendation, the question shall be promptly submitted to the Plant Manager for decision.

VIII. PINCH POINTS AND GUARDING

A. The purpose is to identify areas of potential injurious contact and to minimize the hazard by guarding, posting, or rearrangement of work method.

B. A plan shall be established and maintained for the periodic inspection of all working areas to identify places of injurious contacts, including pinch points or practices where employees may be caught between or struck by objects, together with the necessary action to minimize these hazards.

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IX. HOUSEKEEPING

A. The purpose is to establish and maintain clean and orderly working conditions to assure maximum safe utilization of the work area and to avoid fire hazards.

B. Housekeeping is essential to good safety performance. Housekeeping standards must be established and maintained at all times rather than to depend upon periodic cleaning to eliminate hazards. It is essential that Foremen be held accountable for the standards of housekeeping in the area under their supervision and that General Foremen constantly make spot checks to see that these standards are being maintained. It is equally essential that regular inspection committees be used as a means of maintaining high standards of housekeeping. The findings of such committees shall be recorded to assist in follow-up.

X. INDIVIDUAL SAFETY CONTACTS

*A. The purpose of an individual safety contact is to provide for personal safety instruction by the Foremen to each employee. Foremen shall contact each employee as often as possible but not less than once per week. These individual contacts may deal with safety rules, safe practices, or specific job hazards, related to the work the individual is doing. The General Foremen are expected to contact the Foremen reporting to him daily relative to current safety problems. The Department Head is expected to contact the General Foremen daily relative to current safety problems and shall contact Foremen personally as frequently as conditions permit while inspecting or passing through the work area.

*B. Foremen shall personally review with each employee, as an individual safety contact, applicable Safe Job Procedures as issued and shall make on-the-job observations to assure that these procedures are followed. Job hazards listed in Safe Job Procedures shall be topics for individual safety contacts.

*C. Contacts and observations shall be recorded on the individual Employee Record Card and shall be part of the measurement of the Foremen's safety activities.

*D. The Department Head shall provide training in making effective individual contacts and in selecting suitable material for such discussion.

*XI. AWARENESS CHARTS

A. The purpose is to create awareness of accident causes, acts involved, and occupations in order to stimulate corrective action.

*B. The Department Head shall develop the Awareness Chart to determine what occupations and what acts within those occupations are causing injuries to department personnel. Awareness Charts shall include injuries, violations, and unsafe acts.

C. The Department Head, with the assistance of the Safety, Training, and Industrial Engineering Departments, and the immediate Foremen of the occupations, shall have on-the-job studies made and develop methods to eliminate the cause of injuries within those occupations.

*D. The Department Head should personally maintain the Awareness Chart daily to determine the effectiveness of the job procedures and maintain an audit which will indicate if objectives are being achieved.

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XII. TOOLS, CRANES, AND PORTABLE AND MOBILE EQUIPMENT

A. The purpose is to assure that tools, cranes, and portable and mobile equipment are maintained in safe working condition.

B. Each department shall have a definite procedure with assigned responsibility for the issuance, regular inspection, and maintenance of all portable tools and equipment, including lifting devices, ladders, scaffolds, etc.

C. Foremen shall continually observe the condition of tools and equipment used by their employees and either inspect or have the equipment checked at regular intervals. Defects shall be corrected immediately or repair orders issued for their correction. Under no circumstances shall Foremen permit the operation of defective equipment or the use of defective tools.

D. Regular safety inspection procedures shall be established for cranes and other powered material-handling equipment. Thorough inspections shall be made at regular intervals and a copy of the inspection report shall be filed in the Department Head's office.

*XIII. SUPERVISOR'S SAFETY OBSERVATION REPORTS

*A. The purpose of the Supervisor's Safety Observation Report is to provide a written record of deviations from standards i.e. unsafe conditions, unsafe acts, or violations observed together with the action taken to correct employees unsafe work methods or the physical condition. The use of the Supervisor's Safety Observation Report involves seven distinct steps. These are listed below:

1. Recognizing and stopping unsafe act.
2. Telling worker what he is doing that is unsafe.
3. Telling him the safe way.
4. Showing him the safe way.
5. Having him demonstrate the safe way.
6. Filling out the Supervisor's Safety Observation Report.
7. Checking back to see that he is using the safe way and taking disciplinary action as required.

*XIV. SAFE JOB PROCEDURES (Job Safety Analysis)

*A. Job Safety Analysis is a plan for the analysis of job elements either in small conference groups comprising workers who perform the job and Foremen who supervise the job (Group Discussion Method), or by the Foreman alone (Direct Observation Method). The purpose of Job Safety Analysis by group discussion is twofold:

1. To provide a systematic means for obtaining the experience and knowledge of "those who perform the work" in the preparation of safe job procedures.
2. To increase employee safety awareness and improve safety attitude by employee participation in the formulation of safe work practices.

a. To accomplish these objectives, it is required:

*(1) That management members be thoroughly trained as conference leaders and in the use of the analysis technique.

(2) That a plan for the analysis of job elements on a regular basis be established.

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(3) That statistical data, accident experience, and Supervisor's Safety Observation Reports be used along with management experience to develop the sequence in which job elements shall be analyzed.

(4) That Foremen review the results of all Job Safety Analysis conferences covering job elements over which they have supervision.

*(5) That Foremen be provided with a copy of all approved safe job procedures that apply to their area of supervision.

(6) That all workers performing job elements for which a safe job procedure has been developed be thoroughly instructed in the approved method.

*(7) That Foremen make periodic safety observations to see that safe job procedures are followed and report such observations so that a record is maintained on each Employee's Individual Record Card.

(8) That Foremen enforce adherence to safe job procedures by taking necessary and appropriate action when workers who have been instructed in safe job methods are observed not using the approved method.

*B. In practice, the development of Safe Job Procedures requires the preparation of a list of occupations and job elements to be analyzed, such lists being based on known critical situations within the department. Priority in the analysis of these job elements is assigned based on individual experience, management conferences, or accident experience. A schedule is then prepared under the direction of the Department Head. This schedule establishes the jobs to be analyzed by direct observation and those by group discussion. For group discussion the minimum number of such conferences to be held per week, and the desired wage earner and management participation which is cleared and authorized by the Department Head are shown. Scheduled conferences on job elements are led by a member of management with group participation by workers who perform the job element and by Foremen who supervise workers performing the job element. The conference conclusions are recorded on a Job Safety Analysis form by the conference leader who submits them to all Foremen supervising similar job elements for their review. The conference leader correlates the Foremen's comments and, if necessary, reschedules a Job Safety Analysis conference to give additional consideration to the job element. When Foremen agreement is obtained on the Job Safety Analysis form, the conference leader correlates the preparation of the safe job procedure and submits it to the General Foreman for review and to the Department Head for approval.

*C. Records are maintained on a departmental basis to show job element coverage by Job Safety Analysis together with the individuals participating. Weekly evaluation of Job Safety Analysis activity is made by the Department Head. Awareness charts and other departmental safety data may be used to establish the priority of job element analysis.

D. Approved Safe Job Procedures are given to Foremen who arrange for the instruction of all workers whose jobs include the job elements covered. Follow-up by Foremen is maintained through safety observations.

XV. EMPLOYEE SAFETY TRAINING

A. The purpose is to stimulate employee interest in the prevention of accidents by specific instruction in avoiding injurious contact.

B. Each department shall have a definite procedure for the indoctrination of new employees. Each Foreman shall discuss pertinent safety rules and safe practices with

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each new man coming into his area, whether by hire, transfer, or loan, and shall review them again frequently during the first few weeks of his employment. Departmental procedures should be integrated with the plant Personnel Department's induction procedure for new employees. A check list should be used to insure compliance with departmental procedure.

C. Foremen shall maintain safety training on a continuing basis to the end that employees are taught safe work methods, with their work habits being evaluated and corrected as necessary. The Foremen shall also provide training to assure that each employee thoroughly understands safety requirements, accepts responsibility for his own safety, and maintains housekeeping standards.

XVI. SAFETY OBSERVATIONS

*A. The purpose of safety observations is to follow up on the instructions which workers have received growing out of Safe Job Procedures and job requirements, such as safety rules, regulations, or specific instructions.

B. Safety observations are the spot checks made by Foremen of employees' work habits. Employees once trained in the accepted method of performing work should be observed at regular intervals to determine if they are using the accepted method.

XVII. UTILITY IDENTIFICATION

A. The purpose is to assure that all utilities and outlets are identified, that this identification is uniform within the plant, and that it is maintained in legible condition.

B. Utilities shall be identified as to equipment, service, type of service (steam, air, electricity, etc.), specifying voltage, pressure, etc.

XVIII. SUPERVISORY SAFETY PERFORMANCE (Activity Reports)

*A. The purpose is to provide a comprehensive and systematic means for determining the safety capabilities of each level of management, both as individuals and as an organization, in order to evaluate ability to conduct effectively the U.S. Steel Safety Program.

B. The evaluation of supervisory performance is based not only on quantity but on quality of safety meetings, safety contacts, and safety observations. It is necessary, therefore, in addition to the quantitative analysis of activities as provided by an Activity Report, that each level of management spot check the safety activities of subordinate levels of management in order to make a reliable appraisal of the quality of individual contacts, safety instructions, and safety training provided.

XIX. EMPLOYEE PHYSICAL EXAMINATIONS

A. The purpose of physical examinations is to determine whether or not the applicant or employee's physical fitness is consistent with the job's physical requirements.

B. Each applicant for employment must be given an adequate physical examination to determine whether or not he is employable before the employment procedure is completed. Subsequent physical examinations shall be required in the following instances:

1. Injured employee must have plant Medical Department authorization before he will be allowed to return to work.

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2. Each employee who has been absent from work for thirty or more days must have plant Medical Department authorization before he returns to work.
3. When there is doubt as to an employee's physical well-being following an absence because of illness or at any other time, he should be sent to the plant Medical Department for examination. In all cases where there is any doubt as to the employee's physical ability to perform his work safely, his Foreman shall require that he go to the plant Medical Department for examination.
4. Cranemen, riggers, charging car operators, ore bridge operators, unloaders, locomotive engineers, broad and narrow gauge engineers, truck and tractor drivers, all other mobile equipment operators, and all men who must climb should be re-examined at least once a year.
5. Incumbents of critical occupations, as determined by the plant Medical Department, shall be re-examined on a periodic schedule established by the plant Medical Department.

XX. RECORDS AND CONTROLS

A. The purpose is to provide a systematic means for promptly assembling, tabulating, evaluating, and summarizing safety control data so that it is available for prompt use by line management. The following reports are links in this safety chain of communication:

*1. **Employee Individual Record Card** – Maintained in the department to give a complete record of an employee's exposure to the department's safety activities. It shall record safety contacts and observations made by Foremen, unsafe acts, violations and discipline where given, minor or disabling injuries sustained, and any other information pertinent to the employee's safety experience.

*2. **Awareness Chart** – Maintained by the department by occupation, and operation performed and includes injuries, violations, and unsafe acts. Highlights of this report aid in establishing areas where improved safeguards and concerted safety education are most needed.

*3. **Report of Unsafe Conditions** – All plant employees should be encouraged to be on the alert for unsafe conditions and report them. Prompt action is required on the part of the Foremen or Investigating Committee involved to correct the reported condition. When final disposition is accomplished, Foremen should notify their employees so that their continued interest in safety will be encouraged.

*4. **Supervisors Safety Observation Report** – Used to fill a dual purpose. First, when submitted in sufficient quantity it enables the operating department involved or the Safety Department to classify unsafe acts and violations to determine areas where the greatest accident potential lies. Secondly, it helps to establish areas where additional individual or group safety education is most needed.

*5. **Notification of Violation of Rules** – Use must be restricted to those instances where previous instructions have failed to produce compliance with safety rules.

*6. Departmental Safety Activity Report – Prepared monthly by Department Head, indicating departmental safety activity including the safety performance of individual Foremen.

7. Division Safety Activity Report – Prepared monthly by Division Superintendent and submitted to the Plant Manager, indicating division safety activity.

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*a. In the Safety Activity Reports referred to, the following control data shall comprise the minimum:

1. Number of Injuries
2. Contacts
   a. Individual Contacts
   b. General Contacts
3. Observations
   a. Planned Observations
   b. Violations (Rules, Procedures, Instructions)
   c. Unsafe Acts
4. Discipline
   a. Written
   b. Time Off
5. JSA Conferences
   a. Number Held
   b. Number Employees Attending
6. Unsafe Conditions
7. Inspections
   a. Housekeeping
   b. Equipment

CONTRACTORS'

SAFETY

RESPONSIBILITIES



UNITED STATES STEEL CORPORATION

NOVEMBER 1, 1958

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FOREWORD

Contractors performing work on United States Steel Corporation premises, either pursuant to a standard construction contract or to a purchase order with attached conditions, assume complete responsibility for the safe performance of such work. The contractor assumes that responsibility under the following clause:

> THE SAFETY OF ALL PERSONS EMPLOYED BY SELLER AND HIS SUBCONTRACTORS ON PURCHASER'S PREMISES, OR ANY OTHER PERSON WHO ENTERS UPON PURCHASER'S PREMISES FOR REASONS RELATING TO THIS CONTRACT, SHALL BE THE SOLE RESPONSIBILITY OF SELLER. SELLER SHALL AT ALL TIMES MAINTAIN GOOD ORDER AMONG HIS EMPLOYEES AND SHALL NOT EMPLOY ON THE WORK ANY UNFIT PERSON OR ANYONE NOT SKILLED IN THE WORK ASSIGNED TO HIM. SELLER SHALL CONFINE HIS EMPLOYEES AND ALL OTHER PERSONS WHO COME ONTO PURCHASER'S PREMISES AT SELLER'S REQUEST OR FOR REASONS RELATING TO THIS CONTRACT AND HIS EQUIPMENT TO THAT PORTION OF PURCHASER'S PREMISES WHERE THE WORK UNDER THIS CONTRACT IS TO BE PERFORMED, OR TO ROADS LEADING TO AND FROM SUCH WORK SITES, AND TO ANY OTHER AREA WHICH PURCHASER MAY PERMIT SELLER TO USE.
>
> SELLER SHALL TAKE ALL REASONABLE MEASURES AND PRECAUTIONS AT ALL TIMES TO PREVENT INJURIES TO OR THE DEATH OF ANY OF HIS EMPLOYEES OR ANY OTHER PERSON WHO ENTERS UPON PURCHASER'S PREMISES. SUCH MEASURES AND PRECAUTIONS SHALL INCLUDE, BUT SHALL NOT BE LIMITED TO, ALL SAFEGUARDS AND WARNINGS NECESSARY TO PROTECT WORKMEN AND OTHERS AGAINST ANY CONDITIONS ON PURCHASER'S PREMISES WHICH COULD BE DANGEROUS AND TO PREVENT ACCIDENTS OF ANY KIND WHENEVER WORK IS BEING PERFORMED IN PROXIMITY TO ANY MOVING OR OPERATING MACHINERY, EQUIPMENT, OR FACILITIES, WHETHER SUCH MACHINERY, EQUIPMENT, OR FACILITIES ARE THE PROPERTY OF, OR ARE BEING OPERATED BY, THE SELLER, HIS SUBCONTRACTORS, THE PURCHASER, OR OTHER PERSONS.

This responsibility for the safe performance of the work extends both to United States Steel Corporation employees and property and to the employees of contractor, his subcontractors, and other persons coming on the premises in connection with the work. In the proper discharge of this responsibility, the contractor will meet with designated representatives of the Corporation to view the premises and become completely aware of existing conditions and hazards if any.

Prior to beginning work, the contractor will again meet and consult with designated representatives of the Corporation to discuss the discharge of his responsibilities under the contract.

Pittsburgh, Pennsylvania
November 1, 1958

PART II

PART I

GENERAL REQUIREMENTS FOR THE PROTECTION OF CORPORATION PERSONNEL AND PROPERTY BY CONTRACTORS

Part I of Contractors' Safety Responsibilities outlines the precautions to be taken by the contractor for the protection of Corporation personnel and Corporation property. It is based on actual experience in the Steel Industry and is given to the contractor at the time he inspects the site prior to submitting his bid, with the understanding that these practices represent minimum safety requirements only and in no way relieve the contractor of the responsibility for such additional requirements for the safe performance of work as may be necessary for the protection of Corporation personnel and Corporation property. If clarification is necessary, the contractor should consult with the Construction Engineer of the plant where work is to be performed.

1.0 GENERAL

1.1 All safe practices on construction work outlined in the latest edition of the "Manual of Accident Prevention in Construction", as published by The Associated General Contractors of America, Inc., shall be followed. A copy of this manual shall be on the job site at all times and all contractors' personnel shall have a working knowledge of it.

1.2 Contractor shall recognize that work in the construction may be performed while the mill is in operation and that he is responsible to establish necessary safe practices to permit the performance of work under operating conditions without endangering Corporation personnel and property.

1.3 Where work of contractor must be integrated and coordinated with Corporation operations or with work of other contractor, such integration and coordination shall be undertaken only as authorized by the Engineer.

1.4 The term "Engineer" as used shall be the plant Chief Engineer or his authorized representative assigned to the contract.

1.5 Before entering any Operating Department to perform work, the contractor shall obtain permission from the Engineer after consultation between the Engineer, Operating Supervisor, and Safety Department. A prescribed form of Certification of Instructions to contractors shall be signed by each and a copy obtained by contractor before starting work in each department. Intermittent operations shall be cleared with Engineer before work is resumed.

1.6 Contractors shall comply with all safety codes, laws, or ordinances applicable to any public authority.

1.7 Construction of all temporary buildings and trailers, including wiring and heating facilities, shall be approved by the Engineer.

1.8 The contractor shall report all injuries sustained while on the property of the United States Steel Corporation to the Engineer who will forward to the plant Safety Department.

2.0 TRANSPORTATION

2.1 Contractors' vehicles operating within the plant shall be kept in safe operating condition. This includes brakes, horns, lights, etc. If back-up horns and lights are not provided, a man shall walk behind any vehicle backing up in areas where Corporation personnel are located to warn personnel. Trucks moving in mill buildings must be preceded by a man on the floor.

2.2 All trucks and vehicles operated by the contractor in the plant shall adhere to plant regulations and shall observe all warning and traffic signs.

2.3 Contractors' employees shall not operate locomotives, cars, trains, elevators, other moving equipment, or tools owned by the Corporation unless authorized by the Engineer.

3.0 PERSONAL CONDUCT

3.1 Contractors and their employees shall observe all parking restrictions, access restrictions, and regulations.

3.2 Contractors' employees shall not use sanitary stations and wash houses of the plant except as approved by the Engineer.

4.0 HOUSEKEEPING AND FIRE PROTECTION

4.1 The job site shall be kept clean and orderly at all times.

4.2 Lumber, pipe, and other materials shall be piled where they will not interfere with operations or create hazards. Piles shall have at least six feet clearance between closest track rail, roadways, buildings, and edge of pile. Location of piles to be approved by the Engineer.

4.3 All scrap and waste material shall be disposed of promptly as directed by the Engineer.

4.4 Upon completion of contract, work site shall be cleaned up to the satisfaction of the Engineer in accordance with plant standards.

4.5 Procedure in handling flammable liquids shall be approved by the Engineer.

4.6 Motor fueling locations and procedure shall be approved by the Engineer and plant Fire Department.

4.7 Contractors' personnel shall become familiar with fire protection and gas alarm facilities, including "turning in" of alarms.

4.8 A minimum of 15 feet clearance around all fire hydrants shall be maintained with entrance to same.

4.8.1 Contractors' employees shall not use fire hydrants for any other purpose unless approved by the Engineer.

4.9 Contractors' employees shall obey all fire control and no-smoking signs.

4.10 Contractors shall use only the type salamanders and locations approved by the Engineer.

4.10.1 Contractors' employees shall extinguish all open fire heating units when unattended.

4.11 Disposal of paints and solvents within the plant shall be approved by the Engineer.

5.0 UTILITIES

5.1 Contractors' employees shall not make any connection to operating electrical, gas, steam, air, oxygen, acid, water, or process line unless authorized by a written procedure signed by the Engineer, Operating Supervisor, and contractor and then only when the Engineer has so cleared.

5.2 Contractors' employees shall not turn on or off any of the above lines. All operating valves or switches shall be operated by the responsible Operating Department unless authorized by a written procedure signed by the Engineer.

5.3 Contractors' employees shall not set in motion any mill machinery without the approval of the Engineer.

5.4 All valves or switches shall be locked out by both the contractor and the Operating Department or Engineer.

5.5 Contractors shall not make inaccessible any control valve or switch.

5.6 Contractors shall report any unusual conditions that may be found immediately to the Engineer and stop all work until approval to continue is granted.

5.7 PNEUMATIC AND HYDRAULIC EQUIPMENT AND LINES

5.7.1 Contractors' employees shall not use piped oxygen in place of compressed air.

5.7.2 Contractors' employees shall not break any hydraulic line under pressure.

5.7.3 Contractors' employees shall not burn or weld on existing hydraulic lines without approval of the Engineer.

5.8 UTILITIES - ELECTRICAL EQUIPMENT AND LINES

5.8.1 Power-driven mill machinery requiring shutdown shall be made inoperative jointly by the Engineer and the contractor.

5.8.2 Contractors' employees shall not operate or tamper with any existing power-driven mill machinery.

6.0 OVERHEAD WORK INCLUDING PAINTING AND SCAFFOLDS

6.1 OVERHEAD WORK

6.1.1 Contractors shall be responsible for barricading ground or floor when working above ground level to protect Corporation personnel. The protection shall be equal to that described in the A.G.C. Manual or in accordance with written plant procedures furnished to the contractor. Signs shall be placed warning of danger of falling objects. Watchmen shall be placed if required by Engineer.

6.1.2 Contractors' employees shall not leave tools and equipment when working overhead so that they may fall.

6.1.3 Contractors' employees shall not leave loose material overhead.

6.1.4 Contractors' employees shall not take glass bottles on roofs or elevated areas.

6.2 PAINTING

6.2.1 Painting by spray gun shall be done on approval of the Engineer. Spray painting signs should be posted and consideration be given to wind direction, location of roads, parking lots, etc.

6.2.2 Contractors shall not paint over or smear safety signs.

7.0 CRANES

7.1 Contractors' employees shall not operate any of the Corporation's electric overhead traveling cranes except as approved by the Engineer.

7.2 Contractors shall not carry crane lifts over the heads of Corporation employees.

7.3 Contractors shall not use defective chains or slings in making lifts.

8.0 EXPLOSIVES

8.1 Handling of explosives shall be in accordance with existing plant procedures furnished the contractor at time of bidding.

8.2 Contractors shall not use explosives without approval of the Engineer.

8.3 Contractors shall not drive explosive-driven studs into structural members until approved by the Engineer.

8.4 Use of powder-actuated tools shall conform to standards developed by the Engineer.

9.0 GAS

9.1 Contractors' employees shall not work in doubtful areas until tests for combustible gases, carbon monoxide, and other harmful gases have been made.

9.2 Tests shall be taken before contractors work in oxygen pits or oxygen-enriched atmospheres.

9.3 Purging of oxygen, acetylene, and gas lines shall be performed by the plant.

9.4 Contractors shall not use internal combustion engines inside buildings where personnel are at work unless adequate ventilation is provided.

10.0 SEWERS AND EXCAVATIONS

10.1 Contractors shall protect open manholes, catch basins, pits, and excavations with adequate barricades and red lights.

10.2 Contractors shall replace manhole covers promptly when work is suspended.

11.0 WELDING AND BURNING

11.1 Contractors' employees shall not burn holes in or weld to structural members unless approved by the Engineer.

11.2 Contractors' welders shall not weld without protecting Corporation employees from the arc's rays.

11.3 Contractors' employees shall ground all weldments so that individuals or equipment are not exposed to ground circuit.

11.4 Work areas where burning or welding is done shall be approved for fire protection. Adequate fire prevention equipment shall be on hand.

11.5 Oxygen and gas cylinders shall be returned promptly to storage area after use.

11.6 Oxygen and gas cylinders shall be kept away from heat, open fires, and hot metal.

11.7 Oxygen and gas cylinders shall be stored separately and at least 6'-0" from each other.

11.8 Contractors' employees shall not use oxygen or gas cylinders at ground level in horizontal position. Cylinders shall be used in vertical position and secured to prevent falling.

11.9 Contractors' employees shall not drop or roll oxygen or gas cylinders.

11.10 Caps shall be kept in position except when gauges are attached.

11.11 Cylinders shall not be moved from one location to another with gauges attached.

11.12 Cylinders shall be transported only when secured in a vertical position.

PART II

PART III

PART II

MINIMUM REQUIREMENTS FOR THE PROTECTION OF CONTRACTORS' EMPLOYEES AND THIRD PERSONS WHILE WORKING ON CORPORATION PROPERTY

Part II of Contractors' Safety Responsibilities sets forth minimum requirements which the contractor must adopt and enforce for the protection of contractors' employees and third persons while working on Corporation property. These minima are based on actual experience in the Steel Industry and set forth only minimum safe practices for the protection of contractors' personnel and third persons coming on the premises. They are not intended in any way to be inclusive or to relieve the contractor of all or any part of his responsibility for the safe performance of work. If clarification is necessary, the contractor should consult with the Construction Engineer of the plant where work is to be performed.

1.0 GENERAL

1.1 Contractor shall recognize that work in the construction may be performed while the mill is in operation and that he is responsible to establish necessary safe practices to permit the performance of work under operating conditions without endangering contractors' personnel and property or third parties.

1.2 Contractor shall comply with all safety codes, laws, or ordinances applicable to any public authority.

1.3 Before entering any Operating Department to perform work, the contractor shall obtain permission from the Engineer after consultation between the Engineer, Operating Supervisor, and Safety Department. A prescribed form of Certification of Instructions to contractors shall be signed by each and a copy obtained by contractor before starting work in each department. Intermittent operations shall be cleared with Engineer before work is resumed.

1.4 Construction of all temporary buildings and trailers, including wiring and heating facilities, shall be approved by the Engineer.

1.5 Hard hats shall be worn by contractors' employees, and eye protection shall be worn in designated eye protection areas.

2.0 TRANSPORTATION

2.1 Contractors' employees shall not enter any building, pit, or tunnel unless work requires them to do so and then only after permission is obtained as outlined in 1.3. Contractors' employees shall not visit other departments or other sections of the same department;

when entering and leaving the plant, they shall use only assigned entrances and exits; within the plant they shall use only established walkways, roads, and crossovers in going to and from job site.

2.2 Contractors' employees shall not ride upon Corporation locomotives, cars, trains, elevators, or other moving equipment unless authorized by the Engineer.

3.0 PERSONAL CONDUCT

3.1 Contractors' employees shall keep off mill tables, conveyors, and equipment unless their work requires and then only after drives are locked out.

4.0 UTILITIES

4.1 Contractors' employees shall not work on any hot wire or line under pressure unless authorized by the Engineer.

4.2 Contractors shall maintain minimum clearances between men or equipment and high voltage to conform to applicable states codes and standard plant practice.

4.3 Contractors shall consult with Engineer before working on or around high voltage, electric wires, or power circuits.

4.4 Lock-out of electrical equipment shall be at the main disconnect switch controlling the circuit or machine.

4.5 Locks on main disconnects shall be removed only by the person who places the lock.

4.6 Contractors' employees shall not enter motor rooms or substations unless required and then only after clearance with the Engineer.

4.7 Contractors' employees shall not use electrical wires, cables, or collector rails as scaffold supports.

4.8 Contractors' employees shall not make any connection to utilities or plug or connect into any plant electric circuit until released by the Engineer.

4.9 Contractors' employee shall not ride upon any power-driven mill machinery.

4.10 Contractors' employees shall consider all electric lines hot until cleared by the Engineer.

4.11 All cranes, mobile equipment, jackhammers, concrete busters, etc., operating in areas where they may come in contact with live wires shall be grounded.

5.0 OVERHEAD WORK

5.1 Contractors' employees shall not go on roofs without approval of Engineer. It is the contractor's responsibility to check the bearing capacity of the roof in its present condition to support his equipment and personnel and provide necessary safe conditions.

6.0 CRANES

6.1 Contractors' employees shall not go onto any overhead crane runway of an operating facility for any purpose until authorized by the Engineer through written procedure.

6.2 Contractors' employees shall not go onto any overhead crane runway operated by the contractor and not released for mill operation unless safety precautions have been taken for their personal protection.

6.3 When it is necessary to work on crane, crane runway, or when contractors' employees might be endangered by the movements of cranes, the runway must be protected by bumpers and red lights. If cranes must continue to operate past the area, the contractor must place a watchman on each side of the area as well as a man in the cab of each operating crane.

6.4 Contractors' employees shall keep in the clear of all crane lifts.

6.5 Contractors' employees shall not pass or work under the boom of any crane or power shovel.

6.6 Contractors' employees shall not stand near chains or slings being pulled from under a load nor near a load being raised.

6.7 Contractors' employees shall not ride crane loads.

7.0 GAS

7.1 Contractors' employees shall not work in doubtful areas until tests for combustible gases, carbon monoxide, and other harmful gases have been made.

7.2 Fuel, steam, and air lines shall be blanked off before working in furnaces.

8.0 SEWERS AND EXCAVATIONS

8.1 Contractors shall take precautions to prevent cave-ins.

8.2 Contractors shall check all manholes or underground pits for gas before entering.

8.3 Contractors shall know hazards of gas and liquid level in sewers, take necessary precautions, and maintain gas checks.

8.4 Contractors shall make gas tests before working in valve pit, trenches, or other doubtful areas.

8.5 Contractors shall not excavate in vicinity of electrical duct lines, sewers, water lines, gas lines, or railroad tracks until approved by the Engineer.

8.6 All protruding nails, tie-rods, and wires shall be removed from foundations as soon as forms are stripped.

8.7 Nails from crates or foundation forms shall be bent over or removed.

PART III

PART III

SUGGESTED SAFE PRACTICES FOR ADOPTION BY CONTRACTORS TO INSURE SAFETY OF CONTRACTORS' EMPLOYEES AND THIRD PERSONS

Part III of Contractors' Safety Responsibilities contains suggestions which the contractor may wish to incorporate in his safety program for the protection of his personnel and property and third persons coming on the premises in addition to those minima set forth in Part II. The plant Safety Department, when requested by the contractor, and acting under the provisions of the Construction Contract, will counsel the contractor in the elements of an effective program for the safe performance of work.

1. Establish a schedule of safety meetings conducted by contractor's foreman for discussing specific topics, such as safety rules, hazards of specific jobs, safe practices, etc.

2. Establish a plan for contractor's foreman to contact each employee under his supervision at least once per week on safety.

3. Establish a procedure for the prompt investigation of all injuries by contractor's management.

4. Establish a schedule for periodic inspection by contractor's management of "housekeeping" of job site.

5. Establish a plan for the periodic inspection of tools and equipment by contractor's management.

6. Develop basic safety rules for job, instruct employees, and enforce compliance.

7. Incorporate applicable items of Part I into Contractor's Safety Rules (item 6 above).

8. Establish standards for wearing eye protection.

9. Establish standards for using safety belts.

10. Establish standards for use of portable ladders, giving consideration to use of "safety feet", lashing ladders at top and bottom, or ladders not lashed being steadied by another employee.

11. Establish standards for scaffolding or staging to assure that it is securely lashed and provides adequate clearance to moving equipment.

12. Establish the practice that scaffolds more than 7'-0" from the ground will be provided with toe board and railings and conform to Section 18 of the A.G.C. "Manual of Accident Prevention in Construction".

13. Establish requirements for the wearing of foot protection.