PLAINTIFF'S EXHIBIT
MON-3000

MCC 950920

Monsanto

FROM (NAME & LOCATION) J. J. McClellan - O-11

March 15, 1982

cc: 1981 and 1982 SHAC Committees

SUBJECT Recommendations to SAC Regarding Hard Hat Rules in the Texas City Plant

REFERENCE

TO :SAC

The 1981 Texas City MCI Plant Safety and Housekeeping Inspection recommendations included:

> "There appeared to be some inconsistency in the enforcement of the guidelines covering hard hat requirements. We observed outside truck drivers and female office employees without hard hats. We recommend clarification of the rules covering hard hat requirements."

The 1981 SHAC Committee believe that the Texas City rules covering hard hats were not explained sufficiently to the inspectors. We do not know of any instance where the inspectors observed anyone failing to follow the Texas City rules as specified in the Monsanto Guide to Accident Prevention booklet.

This hard hat question usually occurs as a result of someone being observed going to or from work or personnel in the shop. The rules are violated though by a few personnel taking shortcuts across units (going to and from work) and occasionally by female employees going between the units and the office buildings (apparently not wanting to disturb hair-dos).

The Committee believes that it would require a major change in work habits to require Texas City personnel to wear hard hats to and from work. They doubt that past accidents or the potential for preventing an injury is sufficient to warrant a change in policy.

The 1981 SHAC Committee recommends that a notice of the Monsanto hard hat rules be posted as a SHAC bulletin. Special emphasis should be placed on not violating the rules to cut across units or in going between the units and office buildings/ laboratories.

This would also be a good time to post the new rules (SAC/PMSB) covering hard hats in vehicles.

Already been posted!

Jim McClellan

J. J. McClellan
1981 SHAC Chairman