

# SAFETY PROCEDURE MANUAL

MONSANTO COMPANY

PLAINTIFF'S EXHIBIT

MON-2346

SP-005

CHOCOLATE BAYOU PLANT

## INVESTIGATION AND REPORTING OF SIGNIFICANT INJURIES, NEAR-MISSES, FIRES AND SPILLS

*Revised  
3/20/80*

### PURPOSE

This procedure explains the investigation and reporting of significant injuries, near-misses, fires and spills. Investigations and reports of this type are utilized to determine the basic causes of the incident and the corrective action required to prevent recurrence. The report also serves as a means to communicate the circumstances surrounding the incident to all areas of the plant. Areas not involved will then use the report to determine the potential for similar incidents.

### POLICY

Accidents which result in significant injuries, near-misses, fires and spills will be thoroughly investigated and reported, with follow-up recommendations. Investigations will be conducted regardless of whether the persons involved are Monsanto employees or contractor employees. Investigation and reporting of other incidents are covered under Procedures SP-003 (Minor Injury Reporting and Investigation) and GP-0533 (Loss Reporting).

### DEFINITIONS

1. The following injury definitions conform to the provisions of the Occupational Safety and Health Act (OSHA) of 1970. They also represent a uniform system for recording, classifying and investigating injuries as outlined in "Guidelines for Recording and Reporting Occupational Injuries and Illnesses", Monsanto Co., Safety and Property Protection, January, 1977.

RECORDABLE INJURIES will be investigated under this procedure. Recordable injuries are defined as any death or injury that results from a work related accident or from an exposure in the work environment and involves any of the following:

- a. Medical Treatment (not first aid)
- b. Inability to Work
- c. Restriction of Work or Motion
- d. Loss of Consciousness
- e. Transfer to Another Job

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2. A NEAR-MISS is any incident where significant injury or property damage could have resulted had circumstances been only slightly different than actual or had the activity been continued. A near-miss will be judged significant by the concerned Superintendent or PT Manager with the recommendation of the Safety Department considered.
3. A FIRE or SPILL will be judged significant by the concerned Superintendent or PT Manager with the recommendation of the Safety Department considered.

### RESPONSIBILITIES

1. The GENERAL SUPERINTENDENTS, CED SUPERINTENDENT, and PT MANAGER are responsible for:
  - A. Insuring that incidents which are covered in the definitions section are reported to him and the Safety Department.
  - B. Initiating an investigation, appointing a committee, and briefing the chairman for incidents as follows:
    - (a) Injuries - The Superintendent or Manager of the employee (Monsanto or contractor) injured.
    - (b) Near-Misses - The Superintendent or Manager of the employee (Monsanto or contractor) or the equipment exposed to the near-miss.
    - (c) Fires or Spills - The Superintendent or Manager of the area in which the incident occurs.
  - C. Assigning responsibility for corrective action in his involved areas.
  - D. Reviewing investigation reports for incidents outside their areas, determining application of recommendations and assigning responsibilities.
  - E. Reporting application and status of the recommendations pertaining to their areas.
2. The INVESTIGATION COMMITTEE is responsible for conducting the investigation, recording the facts, and publishing the report.

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3. The DEPARTMENT SUPERINTENDENTS and PT GROUP SUPERVISORS are responsible for reviewing and approving the investigation report, and establishing timing and responsibilities for accomplishing the recommendations.
4. The SAFETY SUPERINTENDENT is responsible for assisting in identification of significant incidents, staffing of committees, advising committees, and review at the Dept. Superintendent/PT Group Supervisor level. He will appraise Management on status of recommendations and maintain files of reports and pertinent correspondence.

### PROCEDURE

1. If an accident occurs which fits into the above general definitions the concerned Superintendent or Manager will appoint an investigation committee. Normally, the committee will be composed of four members, but, the size may be varied depending on the nature and complexity of the incident. A representative of the Safety Department will serve as a member of all investigation committees, unless the exception is approved by the Safety Superintendent. The Superintendent or Manager has the option of staffing the committee from within his own department or other departments in the plant. The exception to this is the Safety Department representative. Individuals directly involved in the incident should not be members of the committee. Final review of selected incidents may be held at the Superintendent or Manager level with approval of the Plant Manager.
2. The following criteria should be used in selecting the investigation committee chairman:
  - A. The chairman named should have served as a member of at least one formal investigation committee prior to serving as a chairman.
  - B. The chairman should be skilled in conference leadership. A key function is drawing all members of the committee into participation and contribution to the investigation.
  - C. The chairman should be skilled in Managerial Analytics Problem Solving and Decision Making techniques.
  - D. Generally, the more severe the incident, the more experienced person required to act as chairman. Usually, a supervisor/technical managerial employee will make the more

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competent chairman, particularly for more complex incidents.

- E. The chairman may need to be familiar with technology of an incident when the preliminary indicators show that technology is important to the cause and/or solution.

Refer to Attachment #3 for suggested instructions to the chairman of investigation committees.

3. The investigation will be started by the committee within 24 hours of the time of the incident. The following guidelines should be used:
- A. Visit scene of accident to investigate physical facilities. Take photographs or make sketches and diagrams to record details of the physical environment.
  - B. Interview witnesses and the injured employee if available. The plant nurse should be contacted to determine extent of injury or disability. Additional concerned personnel may be interviewed and should include the concerned line supervision.
  - C. The committee will tentatively agree on the cause of the accident and recommendations and the chairman will prepare a rough draft following the format in Attachment #1.
  - D. A report number will be assigned by the Safety Department.
4. Within three working days following the incident the investigation report will be reviewed and approved by the Department Superintendent or Supervisor involved. The Safety Superintendent will assist in this review. The entire committee may participate if requested by the chairman, Department Superintendent, or Safety Superintendent.
5. The committee then will present the report in person jointly to the Superintendent or Manager involved and the Plant Manager for approval within five working days following the incident.
6. The basic report, with appendix, will be published within ten working days following the incident. Copies will normally be distributed to all Superintendents, Managers, and the Safety Dept. unless restricted by the Plant Manager.
7. The distribution of the basic report, without appendix, will normally be to all plant supervision, but may be

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restricted by the Superintendent, Manager, or Plant Manager.

8. The following instructions are applicable to status reporting:
- A. Each department will report its response to the recommendations to its Superintendent or Manager. A copy of the recommendations sheet from the accident report can be used for reporting this response, retyping should not be necessary.
  - B. Each department should indicate those recommendations that are applicable to its operations, the date the recommendation is completed, any comments, and the status of the recommendation.
  - C. Investigation committee chairmen should circulate the status reports to the other members of the committee.

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## INVESTIGATION AND REPORTING OF SIGNIFICANT INJURIES, NEAR-MISSES, FIRES AND SPILLS

MONSANTO COMPANY  
CHOCOLATE BAYOU PLANT  
ALVIN, TEXAS

ACCIDENT INVESTIGATION REPORT NO. \_\_\_\_\_  
NEAR-MISS INVESTIGATION REPORT NO. \_\_\_\_\_  
FIRE/SPILL INVESTIGATION REPORT NO. \_\_\_\_\_

DATE: (Approved by Plant Manager)

TO: ALL SUPERVISION (Normally)

SUBJECT: Investigation of \_\_\_\_\_ Accident in

Department \_\_\_\_\_ and Unit \_\_\_\_\_

### DESCRIPTION OF ACCIDENT

The opening paragraph should be a summary statement of the incident itself stating the extent of injuries and/or damage to equipment, who was injured if applicable (functional job descriptions, not names) and the where, when, what and how of the incident. This should be followed by a brief chronological description of the events occurring and conditions existing just prior to, during and following the accident that are related to the accident or that will assist in giving a clearer understanding of the nature of the occurrence. This should be given in summary and limited to a statement of facts only; not conclusions drawn as a result of unsubstantiated theories.

### CAUSE

The prime cause, as determined by the investigating committee, that was responsible for the accident should be covered in this section. Only those secondary causes, if any, that the committee feels were critically important should be listed and labeled "secondary causes". (The listing of secondary causes tends to dilute emphasis on the prime cause.)

### RECOMMENDATIONS

These recommendations should be the result of the investigation by the committee making this report. Only measures to correct both the direct cause and contributing causes to the accident should be covered. If corrections are already made or underway, this should be reflected in the report. Completion dates and assignments of responsibility to Superintendents will be included in this section. Assigning of joint responsibility should be avoided for clarity. Recommendations should be specific and realistic and should avoid generalizations such as "be more careful", "pay attention", etc. When recommending "reviewing" of hazards associated with a given task, refer to specific written sources of information and/or list specific recommended precautions recognized by the committee. Recommendations should be listed on the format shown on page 2 of this attachment.

APPROVED BY:

\_\_\_\_\_  
Superintendent

Date \_\_\_\_\_

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\_\_\_\_\_  
Plant Manager

Date \_\_\_\_\_

(Signed by all members of the  
Investigating Committee)

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|                                                                                                                                                              |            |                                                                   |  |                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------------------------------------------------------|--|---------------------------------|
| A/I, F/S, N-M Report # _____ Subject: _____<br><br>Reporting Department _____<br><br>Status Report Date _____<br>Check When All Recommendations are Complete |            | Distribution of Status Reports (Unit Supv., etc.)<br><br><br><br> |  | Inv. Comm. Chairman<br><br><br> |
| A/NA                                                                                                                                                         | Date Comp. | Comments/Status                                                   |  |                                 |

Recommendations

Recommendations should be listed in priority with the first applying to the prime cause.

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} List One  
 1 - Applicable  
 NA - Not Applicable

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### REPORT APPENDIX

ACCIDENT INVESTIGATION REPORT NO. \_\_\_\_\_

NEAR-MISS INVESTIGATION REPORT No. \_\_\_\_\_

FIRE/SPILL INVESTIGATION REPORT NO. \_\_\_\_\_

DATE: (Approved by Plant Mgr.)

### ACCIDENT CLASSIFICATION

This should be enumerated as follows (where applicable).

1. Name (optional)
2. Department
3. Occupation
4. Experience on the Job
5. Equipment Involved
6. Operation Being Performed
7. Type of Accident
8. Mechanical Cause
9. Human Cause
10. Type of Injury
11. Parts of Body Involved
12. Time and Date of Accident
13. Date Investigation Initiated

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### ACCIDENT INVESTIGATION

This should cover all pertinent information gathered by the investigating committee in sufficient detail. It should include statements of witnesses, past history of the injured if it affects the accident, and any other pertinent information gathered during the course of the investigation.

### PERSONNEL INTERVIEWED AND WITNESSES

Include in this section personnel interviewed and witnesses.

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### INSTRUCTIONS TO THE CHAIRMAN OF INVESTIGATION COMMITTEES

1. Selected chairman will meet with the Superintendent or Manager immediately following the incident requiring investigation to receive a general outline of what is expected of him in his job as committee chairman.
2. The chairman should read O & P Procedure SP-005 .
3. The chairman should not edict his opinions or allow individuals reviewing/approving the report to do so with the committee members. He should use his conference leadership techniques in guiding the committee in their activities. The interest is in finding consensus judgments of the group.
4. It is important that the committee determine the true facts of "what happened" and what can be done to prevent similar or related incidents in the future.
5. Frequently, errors in judgment or failure of individuals to follow established procedures are involved in an incident. These occurrences should not be "whitewashed". They should be recognized by the committee and noted in the report. However, it is important to speak to "what" was done and not speak to "who" did it.
6. The key committee function is to identify the prime cause of the incident. This prime cause should be identified in the report. Any other secondary contributing factors which the committee feels critically important should also be listed, but they should be labeled as secondary factors and should be minimized.
7. The committee's "recommendations" should deal with the prime cause of the accident. Secondary contributing factors and any other safety lessons that have been identified may be listed if they are relevant and important. Recommendations should be as specific as possible. It should not be assumed that plant supervision knows what "standard procedures" or "safe working practices" are. Make reference to specific procedure numbers, plant safety guides, or any other known documents. Describe the actual "do's" and "don'ts" the committee has identified in the incident. Keep in mind that supervision across the plant will be reading these recommendations and trying to relate them to our overall safety program. Make the recommendations meaningful and applicable.

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### INSTRUCTIONS TO THE CHAIRMEN OF INVESTIGATION COMMITTEES

8. While the value of good procedures is well recognized, the temptation to recommend a procedure for every situation should be avoided. The committee's recommendation should be aimed at achieving a correct balance between "use of procedures" and "use of judgment" for plant activities.
9. When the committee is not confident they know the proper action to be taken in a recommendation, they should feel free to recommend that a study or analysis be accomplished to decide what action is necessary. They may want to recommend the involvement of an expert in a given area.
10. Responsibilities and timing for accomplishing each recommendation will be established during the review of the incident with the Department Superintendent or PT Supervisor.
11. All members of the committee who should meet with the Superintendent or Manager and the Plant Manager when accomplishing the investigation review with them.
12. The committee chairman is responsible for obtaining appropriate stenographical help.
13. The chairman should recommend to the Superintendent or Manager and Plant Manager any limitations on distribution of the investigation report if he feels them necessary.
14. The chairman should be informed that the Safety Department representative on his committee is a good source of information regarding how accident investigation committees should function. They serve on many of these committees and have accumulated experience.

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