

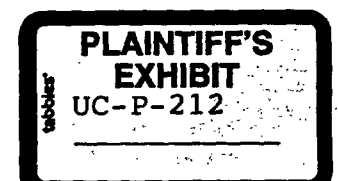
One of our undefined problem areas deals with contract maintenance and our responsibility to these workers under OSHA.

Here at the Brownsville plant all of our maintenance is performed by contract people. These contractors can be divided into three types according to functions:

1. Long term continuing type of maintenance where personnel may work for years in the plant and be as involved in the operation as our own UCC personnel. We furnish all tools and safety equipment to these workers.
2. Contractors for specific jobs who work plantwide on jobs such as painting, electrical jobs and remodeling. They furnish their own tools and safety equipment.
3. Special contractors for specific jobs such as tank erection or special equipment installation where all tools and equipment are furnished by the contractor, including safety equipment. These contractors are usually in the plant for short periods of time, one week to three months and are usually confined to one location.
4. Service contractors such as typewriter repairmen or telephone company people.

Responsibility for requirements under the OSHA Act can be easily written in specific job contracts for groups 2, 3 and 4 above since most work is performed on individual jobs.

Our major concern is for the need of a definition of responsibility to the first group, the long term continuing contract workers who are employed by Brown & Root. We



furnish these workers with all the tools and equipment needed for the job and also supply safety equipment such as respirators, hard hats, goggles, prescription safety glasses (not standard safety glasses), ear plugs, etc. These workers are informed of the hazards and hazardous areas and are trained on proper use of personal safety protection equipment by their own supervisors assisted by our safety department. Warning signs are posted in areas warranted for their benefit, but their exposure to chemical and physical stresses such as air contaminants and noise is not being monitored as required by OSHA.

Another example is that some of the B&R contract maintenance personnel are members of our day shift plant emergency squad. These personnel would aid in rescue and fire fighting activities and would possibly have to use respiratory equipment. These workers have not been certified by either company's physician that they are physically capable of wearing this equipment.

What is our responsibility toward these workers? What is our liability if they are overexposed? Should their employer, Brown & Root, be required to perform the tests and monitoring? Should contracts with B&R reflect all aspects of OSHA including monitoring programs, training and record keeping?

We need help in defining a policy that will satisfy our moral, legal and economic responsibility toward these contract workers.