

SHELL CHEMICAL COMPANY

PLAINTIFF'S EXHIBIT

SH-1608

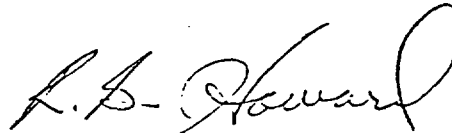
DATE MARCH 21, 1972

TO PLANT MANAGERS/SUPERINTENDENTS

FROM ENVIRONMENTAL ENGINEERING -
ENGINEERING DEPARTMENT -
HEAD OFFICE

SUBJECT OSHA FORM 102 ANNUAL SUMMARY

The attached memo is for your information and guidance. Please
contact us if you have any questions.



R. B. Howard

Attachment

cc - Divisions - Manufacturing - Managers (w/att.)
Agricultural Division - Western Marketing Region - Mr. R. W. Swain (w/att.)

DPMC-00853

LAM 007356

SHELL OIL COMPANY

DATE FEBRUARY 16, 1972

TO MESSRS. C. E. BISHOP
F. K. BLACKHARD
G. L. CROSS
J. H. DENIKE
J. A. EVANS
J. E. GALLAGHER
R. G. JOBE
F. B. LOE
W. C. LOWREY
~~R. L. MANGOCK~~
T. K. MILES
B. G. SCRIMPSHIRE
R. H. TUBMAN
J. F. WEILER
H. H. ZUIDEMA

FROM DEPARTMENT OF OCCUPATIONAL
SAFETY AND HEALTH
HEAD OFFICE

SUBJECT OSHA FORM 102 ANNUAL SUMMARY

By memorandum dated January 21, 1972, we sent you a copy of pages 736 and 737 of the January 18, 1972 Federal Register.

Section 1904.5 covered the instructions for preparing and posting of OSHA Form 102. The instructions added details to the materials provided by the U. S. Department of Labor's Occupational Safety and Health booklet on Record-keeping Requirements that was distributed in the summer of 1971. Based on the information provided by that official booklet, we had OSHA Forms 100 and 102 and the Notice poster printed and distributed in July of 1971.

We have learned some establishments have failed to note and comply with paragraph (c) of Section 1904.5 as published on January 18, 1972. It states:

(c) Each employer, or the officer or employee of the employer who supervises the preparation of the annual summary of occupational injuries and illnesses, shall certify that the annual summary of occupational injuries and illnesses is true and complete. The certification shall be accomplished by affixing the signature of the employer, or the officer or employee of the employer who supervises the preparation of the annual summary of occupational injuries and illnesses, to the lower right hand corner of the annual summary or by appending a separate statement to the annual summary certifying that the annual summary is true and complete.

Attached, as a sample of the correctly prepared OSHA Form 102, is the one posted in One Shell Plaza.

Will you please advise the establishments under your jurisdiction to add the period covered, "July 1, 1971 to December 31, 1971" and words "I certify that this is a true and complete report," together with the signature and title of the person who prepared the OSHA Form 102 to each copy posted.

FEB 17 1972

DPMC-00854

LAM 007357