National Coil Coating Association

SAFETY SURVEY FOR 2008

SAFETY SURVEY
FINAL REPORT

July 2009

Prepared for The National Coil Coating Association

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Introduction

In an effort to provide the NCCA membership with useful and instructive data, the NCCA Environmental, Health, & Safety Committee collects surveys annually from coaters with facilities in the United States. All such coaters are eligible to participate in the survey collection. The main purpose of the survey is to provide members with information that will help them benchmark their own safety performance. In addition, the ideas and philosophies contributed by fellow members may lead to the development of new programs that will enhance safety throughout the industry.

Note that not all participants completed surveys or completed all questions on the surveys.

In addition to this safety survey, NCCA compiles and distributes to participating companies that provide OSHA 300A forms a Safety Statistics Report.

Safety Survey 2008 Results

1. What type of coil coating equipment does your plant utilize?

A. 2 Paint Lines; 2 Slitters; 1 Tension Level Line

B. We have a single pass paint line which was installed in 1956. The paint line has received numerous upgrades, the most recent of which was a $2.4 million dollar controls upgrade in 2006/2007. The paint line can pretreat and paint HDG, CRS, tin plate, electro-galv, GalvAlum and aluminum utilizing conventional tank treatments and dried in place chemical coating. There is also a slitter and roll forming department. Maximum OD is 60", 48" wide and 25,000 lbs.

C. Electro galvanizing line and paint line

D. In-line roll coaters, wet section/pre-treatment equipment, overhead cranes, forklifts, slitting and embossing line, an embossing line, packing equipment.

E. 2 In-line coil unwinds; 1 Entry accumulator; 1 Wet section consisting of cleaning, rinsing, Zinc Phosphate Tank, applicator for metal pre-treatment, sealer and dryer; 3 In-line coating machines; 2 Quench tanks; 2 Convection curing ovens; 1 Exit Accumulator; 1 Quality control inspection station; 1 Rewind; 7 Steering guides

F. Thirty inch wide coating line with two reverse coaters, cleaning station, pretreatment coater, two natural gas fired ovens, twin uncoilers and recoilers and a regenerative thermal oxidizer with heat recovery. Four inch stripe coating line with the same type of equipment as the wider line. Also have a slitter, spooling machine and three boxing lines.

G. 60" coil coating line / Steel & 60" slitter

H. 60" Heavy Gauge Coating Line Designed To Blast/Paint Hot Rolled Steel. 60" Heavy Gauge Slit Line.

I. 54" Coil Coating Line

J. Reverse Roll Coater

K. 1 In Line Coating Lines

L. 2 In Line Coating Lines

M. Typical coil coating equipment (prime and finish, top and bottom), slitting, laminating and electrogalvanizing

N. Roll coaters, wet section, chemical coater, thermal oxidizer, gas ovens, accumulator towers, coil carts, fork lifts, slitter lines and roll formers.

O. Hunter

P. Continuous cleaning, electroplating with prime and finish coating applications. Secondary operations include slitting, embossing and cut-to-length.

Q. Coating rolls, pans, wet section, ovens, quenches

R. 62 inch wide, high speed tandem coil coating line, Herr-Voss Strand Extensioner for slitting, as well as print and embossing capabilities.

S. GFG, Black Bros., Wean, Herr Voss, and several other roll type coaters.

T. Coating rolls, pans, wet section, ovens, quenches, leveler

U. One single coat line & one slitting line

V. Conventional continuous coating equipment

W. Pickle Line, Cold Mill, Metal Coating Line, Paint Line, Slitter Line, and a Cut-to-length Line

X. ZincAlume Metal Coating; Paintline; Slitter; Embosser

2. Does your company have a Safety Committee?

Yes 28 No 2

	2002	2003	2004	2005	2006	2007	2008
Yes	91%	98%	89%	91%	97%	85%	93%
No	9%	2%	11%	9%	3%	15%	7%

3. If YES, please list each committee member's title or position at your company.

A. EHS Manager, Operations Manager, Human Resources Manager, EHS Assistant, Maintenance Operator, Slitter Operator, Station 3 Operator

B. The Safety Committee is comprised of the plant manager and hourly employees from the various departments. Their activities include administration of the Safety Incentive Plan and leading/conducting the internal SAR inspections.

C. Production Leader, Maintenance Leader, Scheduler, Production Leader(Committee Chair), Paint Line Operator, Materials Manager, E-G Line Operator, Director of Operations, Buyer, Engineering Leader, Production Leader, Maintenance Electrician, Maintenance Electrician, President, Purchasing Leader, Associate Development Coordinator

D. Plant Leader, Plant Engineer, Paintline Leader, Maintenance Operations Clerk, HR Assistant, Team Leader Shipping and 4-6 members from the hourly force.

E. Safety Coordinator, Vice President of Operations, Group Operations Manager, Plant Manager, Production/Operations Manager, Maintenance Manager,

F. Quality & Safety Coordinator, Human Resources Administrator, Senior Maintenance Technician, Senior Trim Coil Material Handler, Slitter Material Handler, Alternate Crewman, Narrow Paintline Lab Technician, Director of Operations, Director of Engineering & Quality Assurance

G. (Hourly) – Maintenance Asst, (Hourly) – Paint Line Crew Leader, (Hourly) – S/R Specialist, (Hourly) – Inventory Control Tech, (Hourly) – S/R Specialist, (Hourly) – Electrician, (Hourly) – Paint Line Crew Leader, (Hourly) – Maintenance Asst., (Hourly) – S/R Leader, (Salary) – Process Improvement Engineer, (Hourly) – Material, (Salary) – Manufacturing Manager, (Salary) – Quality Manager, (Salary) – Senior Production Leader

H. Slitter Helper; Angle Line Helper; Crane Operator; Entry/Exit Oper Paint Line; QC Technician; Shipping/Recvg. Lead; Maintenance Lead; Coater Operator; Angle Line Operator; and Elec/Mech. Maintenance.

I. Senior Production Leader, Maintenance Supervisor, Maintenance Manager, Quality Manager, Quality Engineer, Regional Operations Manager

J. Process Engineer, Production Supervisors, SRW Supervisor, Production Manager, Maintenance Manager and Supervisor, QC Operator, SRW Operator, Coil Coating Operator, Lamination Line Operator, Reclaim Operator, Safety Coordinator, Plant Manager

K. We have 5 Management Reps and 14 Union Reps, from Management they are Plant Manager, Engineering Manager, Maintenance Manger, EH & S Supervisor and Ship/Rec Manager.

L. EHS Manager, Plant Manager, Operations Manager, QA Supervisor, HR Manager, Customer Service Rep, Process Control Operator, Line Operator, Production Supervisor, Coater Room Operator

M. Plant manager, Safety manager, plant facilitators, Union president, and union members.

N. One includes the president, plant managers, the engineering manager, HR managers, safety engineer and safety manager. Another is led by hourly volunteers but also includes the plant manager, department managers, and supervisors. Production, Maintenance and Quality personnel also meet each morning to inspect the plant and handle many issues traditionally handled by safety committees.

O. EHS Coordinator, maintenance tech, line operators, slitter operators, crane operators, wastewater treatment operator and production group leader.

P. Plant Manager, Production Manager, Quality Control Manager, Maintenance Manager, Service Material Foreman, Office Administrator, Maintenance Foreman, Technical Service Manager, Union Representatives (2)

Q. Plant Manager, EHS Coordinator, Quality Control Manager, Production Manager, Shipping Manager, Customer Service Manager, Human Resource Manager, Plant Controller, Slitter Operator, Shift Foreman, Shift Groupleader, Receiving Clerk, Shipping Clerk,

R. Plant Manager, Production Manager, Maintenance Manager, Foreman, Maintenance Repairman, WWT Operator, Coater Operator, Operation

S. Plant Manager, Production Manager, Quality Control Manager, Maintenance Manager, Black Belt, Union Representative

T. 4 union members, Plant Manager, Maint. Super., Q.C. Manager

U. Pickle Line Manufacturing Associate (3), Cold Mill Manufacturing Associate (3), Metal Coating Line Manufacturing Associate (3), Paint Line Manufacturing Associate (3), Security Associate (1), Maintenance Associate (2), Administration Associate (3), EHS Staff (4), Area Managers (5) Plant Manager (1)

V. EHS, Zinc Line, Maintenance, Paint Line, Product Distribution, Plant Manager

4. Currently, do you have any safety programs implemented to heighten safety awareness at your plant?

Yes: 31 No: 1

	2002	2003	2004	2005	2006	2007	2008
Yes	96%	91%	95%	97%	97%	95%	97%
No	9%	2%	11%	3%	3%	5%	3%

5. If YES, briefly describe your safety program(s).

A. Safety alerts, toolbox talks, near-miss tracking and root cause analysis

B. Have a Safety Scorecard for each department which is checked daily by management during daily Gemba Walks. Have a monthly Scorecard that is completed by the Plant EHS Manager and reviewed by Corporate EHS for completion.

C. Safety goals (0 LTA's and 2 or less recordables) are always included in main company goals and discussed and reinforced in all company meetings. Monthly Safety Committee meetings. Meetings last from 1.5 to 2.5 hours. Minutes and To-Do Lists are maintained, distributed, and followed up to completion. Monthly Safety Training sessions--attendance required. Usually 30 minutes long, repeated 3 times in order to cover all shifts. Training done by appropriate staff members, hourly workers and outside experts as relevant. Safety Cross--daily visual sign tracking LTA's, recordables, near misses. Posted in several different locations. Electronic sign indicating number of days without an LTA--currently, 1205 days without an LTA.

   Quarterly safety audits of each area (10 in all), done by volunteers along with a worker in that area; findings require an improvement plan and action.

   "Safety is our Lifestyle" commitment poster hung in plant and signed by employees. "Safety To-Do List" and "Safety Done List" published by Safety Com. to insure that safety issues are identified and resolved. In 2008, over 30 projects were completed.

   Active 6S program--standard Lean 5S program with a distinct inclusion of the 6th S for safety. Annual safety assessment walk through by consultant from the Ohio Bureau of Workers' Compensation. Action plan developed based on findings and followed up until completion..

D. Monthly safety meetings and plant inspections by two employees, a weekly "safety hit list" is distributed to key safety committee members listing safety items that need addressed and items that are completed, this also includes safety alarms that have been completed.

E. Corporate Safety Manual which outlines prescribed safety procedures and programs, Yearly review of Corporate Safety Manual by Corporate Safety Coordinator, Yearly plant inspections (mock OSHA) with a written audit report, Corporate 52 week safety program, Daily plant safety contacts with all employees, Monthly plant safety meetings and inspections, Corporate Safety video program, Daily review of required PPE with each employee and documentation of same, Various internal and outside vendor supplied safety courses for all employees, Yearly review of Job Safety Practices, Intercompany transfer of all accident information and corrective action taken, Monthly Safety and the Supervisor periodical handouts

F. Monthly safety meetings; articles in quarterly newsletter.

G. Proactive Safety Actions - Each employee identifies and reports an unsafe condition in the plant which is corrected every month. Personal Safety Commitments were written by all employees in the plant and posters were made sharing their commitment with all of their fellow employees. Safety Poster Campaign. Safety training involving role playing, and in house videos using all employees. Pre-shift safety talks everyday

H. Proactive Safety Actions - Each employee identifies and reports unsafe condition in the plant every month which is corrected. Safety training performed monthly discussing various topics of safety matters. Safety demonstrations are conducted by our Safety Committee. Pre-shift meetings begin every shift with safety being the lead off topic.

I. Area supervisors and managers review incident information with all area employees and conduct area/task specific safety training. The Safety and Health Department conducts monthly training by topic. New equipment reviews are done with engineering and production staff.

J. We have a Safety Incentive Program, an Annual Safety Slogan Contest, 5-Minute Meetings and what we call "We Celebrate Safety Program.

K. Plant facilitators conduct daily safety contacts, monthly awareness training, Safety meetings, 5S, program, root cause incident/accident investigation, near miss investigation.

L. Same as last year's submission + new safety team led by hourly employees.

M. Routine inspections/checklists - weekly & daily, periodic safety (team) walks, scheduled training classes, toolbox talks on current issues, incident investigations, audits from corporate managers, insurance company audits, involved with LEPC and high visibility to give employees the opportunity to talk.

N. Monthly safety meeting, monthly safety walk through, monthly 6S internal audit, job safety inspections, 6S program, annual OSHA/RCRA/DOT training, new employee training

O. Production members of the safety committee are to turn in 3 safety related items that need to be addressed before every monthly committee meeting.

P. Larger safety committee, frequent plant audits, 6S, Near Miss communication, Safety Signs, Mistake Proofing, ACARA, JSI's, JHA's.

Q. Monthly safety meeting, job task training, job safety instructions, 6S program, annual OSHA/RCRA/DOT training, new employee training, CPR/First Aid/ AED training

R. We use a combination of a Behavioral Based and Engineering Based Safety program. Our approach is to get as many employees involved in our safety program as possible. We promote communication, awareness, and involvement. We reach this goal by having our employees conduct safety observations and attend safety meetings. In addition to our safety representative meetings and team safety meeting we have several sub-committees led by our employees addressing various topics including LOTO, emergency evacuation, electrical safety, and rigging.

S. We also encourage employees to report incidents no matter how small they may be. By doing this we are able to address issues before they become serious. We have visual signs throughout the plant and use reader boards with safety slogans and reminders.

T. Our engineering side of program looks at identifying the hazard and implementing controls to eliminate or minimize those hazards. We use JSA, employee observations, incident reports, and audits to identify the hazards that need to be addressed. To track the progress of the corrective actions we have established an on-line corrective action item checklist.

U. Our safety training program includes an overview of all safety and environmental subjects. All employees are assigned to go through safety training annually. To protect our visitors and guests

we have established a contractor safety program that addresses the safety of our visitors. All visitors are required to go through this training before entering the site.

V. Safety Conversation Program, EHS Steering Committee

W. Each plant has committee

6. Has your plant conducted any safety training in the past 12 months?

Yes: 32 No: 0

	2002	2003	2004	2005	2006	2007	2008
Yes	100%	100%	100%	100%	100%	100%	100%
No	0%	0%	0%	0%	0%	0%	0%

7. If YES, briefly describe the type(s) of safety training conducted at your plant in the past 12 months.

A. Annual refreshers as required by OSHA or when job observation/incidents reveal a need to retrain on specific topics.

B. LOTO, Hazcom, CPR/AED, Slip, Trips & Fall, Hearing Conservation, etc.

C. Monthly safety training is provided to all employees according to the following schedule:

January: Master Plan 2008
February: Lockout/Tagout
March: Customer/Contractor Safety
April: Hazard Communication
May: Confined Space
June: Family & Home Safety/Laser Safety
July: Back Injury Prevention
August: Hearing Conservation Program
September: Fire Prevention

October: Crisis Reponse PRogram & Fatality Hazard Survey
November: Hand/Finger Safety
December: Lift Truck Safety

In addition to the monthly training described above employees are involved in ongoing safety training throughout the year. Recent employee safety training classes included: CPR/First Aid/AED, Rigging & Hoisting, 70E/Arc flash, ergonomics, electrical product safety training, mobile equipment (fork trucks, JLG, scissor lifts etc), overhead crane, fire alarm panel review, evacuation plan training & practice, spill response, MSDS, racking guidelines, "Parrot Beak" drum lifter attachment, RPM (Reliability Performance Model), slitter tooling software, Portaspec & Fisherscope safety training, fall arrest.

CPR/AED/First Aid training is provided annually(First Aid provided biannually) to all Emergency Repsonders and Suprvisors. Training is provided by the American Red Cross. Training for 2008 was conducted in October.

One employee was certified in crane inspection and rigging by Crane Institute of America. One employee was trained by OSHA as a Special Government Employee (SGE) and participated in an OSHA VPP audit. Three employees have attended OSHA General Industry 30 hour training and one employee is an OSHA General Industry Outreach Trainer. Managers, supervisors and office staff can participate in the USG Training & Development training classes at the training center in Schiller Park, IL or at selected plant locations. Available safety training includes Fundamentals of Safety, Advanced Safety, Hazwoper, Basic & Advanced Electrical, and Electrial Grounding.

D. Daily safety huddles are presented by the hourly supervisors to the employees on their shift. Huddles are documented on the Supervisor Weekly Safety Activity Report. Subject matter varies but includes review of Accident No Injuries (ANI), JSAs including revisions to JSAs, OSHA fatal facts, weather related topics (i.e. heat stroke prevention, slips/trips/fall warnings during icy weather). Sometimes employees conduct safety huddles as a result of an ANI or a specific safety topic they wish to share with other employees.

E. Improving Safety Attitudes and Performance, Avoidance and Treatment of Chemical Burns, Coil Stacking--Safety and Organization, Office Safety, Hazardous Waste, Lock out Tag Out, Severe Weather Procedures, Inspecting Tow Motors and Cranes, Blood Borne Pathogens, Driving Safety, Crane Safety, Ladder Safety, Holiday Safety Tips.

F. HMIS,SCBA, fire extinguishers, towmotor training, 22 employees were trained first aid, CPR and AED unit, hearing protection and bloodborne pathogens

G. First Aid and CPR training and certification, 2) Blood Pathogen training, 3) Pulmonary testing, 4) Hearing testing and conservation, 5) Hazardous Material training, 6) Hazardous Waste training and documentation, 7) Lock Out Tag Out training, 8) Fire Extinguisher training and certification, 9) Location and reason for MSDS, 10) Employee Right to Know, 11) Job Safety Practices review, 12) Confined Space training, 13) PPE (personal protective equipment) requirements, 14) Crane and Areal Equipment training, 15) Emergency Evacuation Plan, 16) Lifting Techniques training, 17) Paintline / Slitter nip points and required guarding, 18) Emergency Stop locations and required shut down emergency stop testing, 19) Spill Prevention program, 20) Heat Stroke

prevention program, 21) Hot Work Permitting, 22) Required employee commitment to company safety programs, 23) Graphic safety videos on accidents and how to avoid through proper training, 24) Safety Poster program and meaning of same, 25) Slitter Electric eye safety,.

H. Hazardous Communication, Bloodborne Pathogens, Lockout/Tagout, Confined Space Entry, Hearing Conservation, Personal Protective Equipment, Powered Industrial Vehicles, Emergency Action Plan, Emergency Response, Accident Investigation, Hot Work, New hire safety orientation, Grounding & bonding, General Safety, Stacking Coils Safely, Paint Storage Room Safety, Wearing Hard Hats & Bump Caps, Wearing Kevlar Gloves, Wearing Kevlar Sleeves, Safety Refresher Training.

I. Annual 4 hour Safety Training on Company Website covering all OSHA required training, Monthly Safety Meetings using in house made videos and demonstrations, Safety begins all preshift meetings.

J. Respiratory Protection and Fit Testing, Incident Reporting and Workers' Compensation, Emergency Response Coordinator, Hot Work Operator and Hot Work Supervisor, Custodial Safety, First Aid (including CPR, Bloodborne pathogens, and AED's), Electrical Cabinet Entry Safety, Heat Stress, Back Safety, Hearing Conservation Training and Audiograms, Lab Safety, Confined Spaces, General Lockout/Tagout and Task-specific Lockout/Tagout, Chemical Handling, Bonding and Grounding, Fall Protection, Shift Work, and Fire Extinguisher Safety.

K. We have a new topic every month, some are, Confined Space, Fall Protection, Hazcom and Emergency Evacuation to name a few.

L. The purpose is to promote safety awareness, ensure the use of proper safety equipment and ensure compliance to all plant safety guidelines.

The Morning Operations Meeting begins with a discussion of safety. This practice keeps personnel focused on safety concerns. Outstanding safety projects are discussed as well as other safety related issues. As a general rule, this format is followed for most meetings conducted at the facility.

A Safety Committee meets on a monthly basis to discuss accidents, incidents, training, safety equipment and other safety projects. The committee is designed to consist of a cross section of representatives from several departments.

Safety Training consists of general plant safety orientation for new hires and specific departmental required training and OSHA required training where appropriate. An internet based computer system is utilized for most of the required training with additional meetings as necessary to cover other required topics.

All employees, contractors, visitors and guests are required, and held responsible, to comply with all plant safety guidelines. Enforcement of safety policies and procedures is the direct responsibility of all managers and supervisors. Management personnel are expected to set anexample.

M. Internet based safety training for all employees (Coastal ClarityNet) as well as mandatory plantwide meetings to discuss topics not covered by the computer training. (eg emergency action plan, evacuation procedures, radiation protection, hazardous material handling, CPR/AED/FA, etc.)

N. Every month there are OSHA, DEP/EPA training sessions related to safety, health, and environmental awareness.

O. Monthly safety topic including OSHA required and other topics are provided for hourly employees. After a safety video or PowerPoint, the team leader leads a discussion or administers a quiz. Salaried employees are also provided monthly safety or health related training.

P. Haz Comm (w/PPE), DOT general awareness, LO/TO and arc flash safety, forklift certification, audiometric.

Q. New employee training, annual OSHA/RCRA/DOT training, CPR/First Aid/AED training

R. Forklift Operator Evaluations, Personal Protective Equipment, Fire Extinguisher Safety, Hot Work Permits, Fire Drill

S. Required OSHA and Environmental

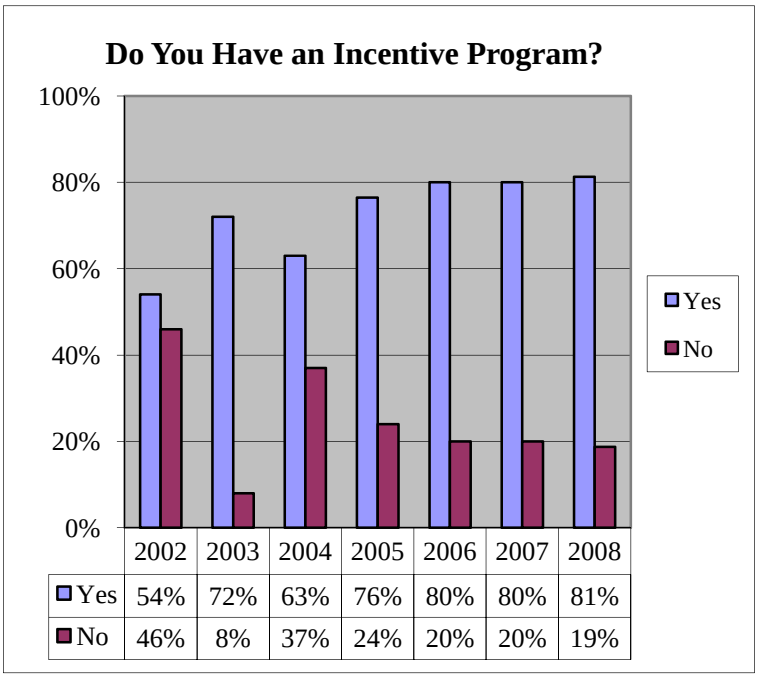
T. Forklift, LO-TO, Haz Com., PPC plan review

U. DuPont Employee Action Training, DuPont Advanced Safety Leadership, New employee orientation, Lockout/tagout , Confine Space, Respiratory Protection, Hearing Conservation, Eletrical Safety, PPE, Fall Protection, Hazard Communication, HCL Awareness, Chromic Acid Awareness, Spill Response, Emergency Evacuation, Crane Training, Forklift Training, Ergonomics, Fire Extinguisher Training, Train a Trainer, Rigging Safety and DOT Hazardous Material Training

V. EHS Regulatory Training

8. Currently, do you have any incentive programs that promote safe work practices at your plant?

Yes: 26 No: 6



	2002	2003	2004	2005	2006	2007	2008
Yes	54%	72%	63%	76%	80%	80%	81%
No	46%	8%	37%	24%	20%	20%	19%

9. **If YES, briefly describe your plant's incentive program(s) that promote safe work practices.**

A. Quarterly gainshare program includes a performance metric for # of recordable injuries during the period.

B. It Pays to be Safe; A monetary safety bonus is paid every four months if no OSHA Recordable injuries occur. All employees are included in the program.

C. The intent of the Safety Incentive Plan is to recognize and promote employee efforts and achievements toward the overall plant safety program. The primary program is "Safety First; Driving Success". Each week 10 employees are randomly chosen to receive $35 gift cards. As the number of hours worked without a lost time injury increases in increments of 250,000 bonuses of $20 per employee are added to the wheel. In the event of a recordable or restricted injury there is no spin/drawing that week. In addition, if the plant achieves a safety rating of zero for the entire year each employee receives a $50 gift card.

D. Celebrations are held for significant milestone achievements (3 million hours without a lost time injury, five years without a lost time injury etc.)

E. After a month with no recordables--all employees receive a treat (food) or refreshment token for vending machines. After 3 months with no recordables--all employees receive lunch--a cookout with sides, on the company. After one year with no recordables--larger celebration/reward to be determined. For one year, the award was a monogrammed ("Safety Award") shirt or jacket chosen by each employee.

F. Cash bonuses are paid for meeting goals for having no OSHA reportable ot lost time accidents. Yearly prize drawings for employees that participate in safety meetings and submit safety ideas. Safety awareness posters and flyers are displayed throughout the plant. Also we distribute small safety reminders such as pens, twizzlers and stickers with paychecks. Twice last year we distributed safety t-shirts to all employees.

G. We offer a quarterly monetary incentive program that acknowledges required employee safe working practices for attainment of "Zero Tolerance for Accidents." Presidents yearly monetary incentive program acknowledges attainment of "Zero Tolerance for Accidents" if applicable.

H. Safety is one of five categories of a plantwide Qtr. Gain Sharing Program "Share Our Success "SOS". All employees are required to turn in at least one Proactive Safety Action (PSA) every month or they will lose 25% of SOS payout. All employees must attend all monthly safety meetings or the make-up meeting during the Qtr or lose 25% of SOS payout. Each plant can lose full safety payout at their site if they have two or more OSHA Recordables of one Lost Time Accident during the Qtr.

I. We currently utilize a gain share program. This program has both safety and environmental portions with both positive and negative impacts. We also provide lunches each month if there were no OSHA recordables in that month.

J. If we can go three months without a recordable, they plant employees get lunch bought for them

K. If the office/plant goes accident free for a month, lunches are provided to all crews and $250 gift certificates are also raffled off to one employee per shift (attendance is also tied into this recognition award).

L. We offer a yearend bonus to all hourly employees. The bonus is affected by any accidents that may occur and housekeeping that is monitored through 6S evaluations.

M. Attendance and Safety Bonus, and Gain Sharing Bonus.

N. A gain sharing program was implemented at our facility in 2007, and the plant employees can be rewarded in the following categories: Safety, Productivity (in 3 categories), Prime Yield, Supply Usage, Claims, and shipping Performance. The plant management came up with a system that would challenge our employees to achieve optimum performance in these critical areas.

O. We encourage participation into our Safety Program. Employees receive a monthly bonus for meeting attendance and for conducting safety observations. Each month we establish a set number of safety observations and meetings to be conducted. If the employees reach established number then they receive a monthly bonus. Employees are also recognized for going above and beyond their normal job duties to promote safety.

We also have a program called "Deal or No Deal". With this program employees are rewarded with points when they conduct safety observations early in the month and for conducting more than 1 observation per month. At the end of the month we add up the total points for each employee and then the top 8 point getters get to play "Deal or No Deal". We have 15 envelopes with gift cards ranging from $10 to $250. When they choose an envelope they get the opportunity to take that envelope or take bribe gift card from the host

P. Safety Pays - Gift Cards for Injury-Free months

10. If NO, why not?

A. Previously tried incentive programs were ineffective in the long term. Safety infractions are part of the annual performance review criteria.

B. We do not have a traditional safety incentive program, but we do have "Theme" day once per month. The Theme day is a meal (either catered or cooked by management) or small outing or gift chosen by our operators for our operators. We feel this creates a great morale for our employees.

C. Quarterly safety lunches and prizes have been suspended during this poor economic period.

D. Not a company policy

E. We were advised by council that all incentive bonuses and awards, if part of a formal program, must be calculated into the premiums for overtime; therefore, we ended all formal incentive programs and now only celebrate "spontaneously" for noteworthy achievements and milestones.

11. When reporting injury/illness rates on the OSHA 300 form, are you including:
Office Employees Only: 1
Plant Employees Only: 0
Both Office & Plant Employees: 31

12. Based on what you reported on the OSHA 300 form for 2008, please provide a description of the lost time accident/injury per employee and the action taken to remedy the problem or cause.

Amputated tip of finger	Safety stand-down with all employees to review incident. Redesign bearing mounts to make roll changes easier. Engineer a roll lifting system for this area to simplify the task.
Back strain	No corrective action taken since no specific action caused the strain
2nd degree burns from fire	The can the employee was pouring HI-Sol 150 into was not properly bonded. We instituted the following: the continuity of the bonding/grounding system in the entire coater room will be checked monthly as a PM, bonding/grounding training frequency was increased to every 3 months from annually, any new equipment going into the coater room (i.e.- bonding clamps, hoses, pumps, etc.) will checked by an electrician to make sure it is properly grounded before first use.
Back strain from moving drums	We switched from a 4-wheel drum dolly to a 5-wheel drum dolly to improve load distribution and stability
Cut on left thumb from metal	Employee was disciplined for not wearing PPE (gloves)
Laceration to forehead requiring stitches	Created training outline for the task being performed to ensure personnel are performing task properly; implemented new policy requiring bump caps for personnel performing paint changes, performed training.
Strain to left ankle	Retrained employee on forklift safety; this was not determined to be a problem with procedure, equipment or facility.
Laceration requiring stitches to right arm	Created training outline for the task being performed to ensure personnel are performing task properly; implemented new policy requiring kevlar sleeves for all production personnel, performed training.
Laceration requiring stitches to right arm	Created training outline for the task being performed to ensure personnel are performing task properly; implemented new policy requiring kevlar sleeves for all production personnel, performed training (2nd laceration happened 8 days after first)
Laceration requiring stitches to right arm	Created training outline for the task being performed to ensure personnel are performing task properly; inspected machinery and put in work order for adjustment; ordered new spacer rings for slitter.
Employees smashed his hand when using a crane to place a scrap coil into a scrap hopper. The crane C-hook jerked back and pinned his hand against a turnstyle sitting behind him.	We had our Safety Committee investigate the accident and they relocated the Scrap Hopper to not have a confined space issue. Rewrote Scrap coil handling procegures and trained all floor personnel using cranes and forklifts.

Employee received a burn and laceration to the right leg generated from a hot coil tail while removing scrap from uncoiler with a cutting torch	This employee along with other angle line employees and personnel who use a cutting torch were re-trained using proper techniques. This training also included pinch points and body mechanics. (keeping yourself out of harms way)
Sprain, right ankle	The area was evaluated for any trip hazards. Determined that employee was not paying attention to surroundings.
Employee tripped over a hose laying on the floor in one of our coater rooms	Engineering redsigned the layout of the coater room
Mechanic working in shop on a piece of grating - attempted to lift the grating from the table and place on floor - the piece was still warm so he extended his arms when lifting - the piece was too heavy to lift in this fashion resulting in a torn forearm muscle	Basic awareness - get help with the lift or use a mechanical meams to accomplish the task
SLAP lesion of left shoulder from building slitter setups. Surgery required.	A special ergonomics team was formed, led by a professional ergonomist and including numerous hourly representatives and several supervisors. The team identified several actions including employee rotation, lighter jet nuts, rearranged work space and a requirement that no more than one two-inch spacer may be lifted at a time.
Crane operator had foot run over by forklift. Stepped from coil row into main aisle.	Stopped double stacking at the end of coil row to improve visibility for both crane operators and forklift operators. Toolbox talks held - working near moving wquipment. Created Red Flag system where non-crane operators must red flag coil rows if they enter for inventory or inspection reasons.
Employee fell off flat bed truck and fractured left hip	A jsi was implemented to keep employees off flat bed tucks. Coils will be lowered to designated areas for inspection/tagging. Employees received training on this jsi.
Forklift ran over employees foot due to congestion in area.	The floor scale was moved away from area to relieve the congestion and allow more space for employees to walk away from the forklifts.
Employee fell when chair he was sitting on gave way because a weld broke.	Safety Committee checks the chairs and stools surrounding and within the process to make sure welds are sound and that chairs are in good condition. This is supposed to be done 2X a year.

Umbilical hernia from moving skid	none
Employee bypassed guarding by ducking under the guard. A drive shaft came loose and hit the the employee in the mouth, head, and left arm.	The guarding was extended to ensure it could not be physically by-passed in the future. Actions were taken to ensure the future actions of the injured employee would have a higher regard to safety.
Employee slipped on frozen ground in the parking during inclimate weather. The fall caused a bruised hip.	A safety awareness promotion was initiated within the facility to promote a more cautious workforce during inclimate weather. Actions were taken to ensure the future actions of the injured employee would have a higher regard to safety.
Back Injury	Installed overhead hoist/articulating jib arm to assist operators.

APPENDIX A

National Coil Coating Association

February 2, 2009

NCCA BULLETIN NO. 13-09 (E)

TO: COATER MEMBER SAFETY REPRESENTATIVE

SUBJECT: Safety Data Collection

For many years, NCCA has been collecting accident-related information from its coater member companies with facilities in the U.S. This data has been used primarily to help NCCA members benchmark their operations against the coil coating industry in general, and to benchmark the industry against other industries. The data is also used to select the finalists in the annual NCCA Safety Award Program for those companies that choose to participate in the award process.

The attached questionnaire requests information related to your company's safety program and performance. Please return the questionnaire and a copy of your company's completed OSHA 300 or 300A form for 2008 to the NCCA office by **February 20, 2009.** If you did not participate in this program last year or did not provide historical data, we strongly urge you to submit data for 2008 and the previous three years, as well. We have historical information from the facilities shown on the attached list. These facilities need only supply a questionnaire and data for 2008. The historical data enables comparison of 2008 data with previous periods and will display possible patterns and trends, in addition to illustrating how issues regarding safety are progressing over time.

As with all NCCA data collection efforts, we will maintain your company's anonymity by keeping all submitted information completely confidential and releasing the aggregate information only. The data you submit will be used by Thomas Associates personnel only to prepare the annual safety report.

If you would like your company to be considered as a candidate for the Annual NCCA Safety Award, please complete the attached release form authorizing NCCA to share your company data with the Safety Committee under the following guidelines:

- the Safety Committee will review anonymous data only for the top ten participating facilities.
- only after the committee has identified the top five participating facilities will the identity of those facilities be revealed, and only to the committee members.
- representatives of the top five participating facilities will be interviewed, and plant visits will be arranged in order to select the winner of the award.

All companies that submit data will receive a complete report listing and analyzing the reportable accidents, lost time accidents, and accident severity for the NCCA coater members.

If you are not the individual within your company who should receive this information, please forward this

information to the appropriate individual and advise our office so our records can be changed accordingly.

If you have questions regarding data collection or reporting, please contact NCCA Headquarters at (216) 241-7333 or via E-mail at ncca@coilcoating.org.

Thank you for your participation in this very important program. **Please remember the information is due at headquarters by February 20, 2009.**

Sincerely,

R. Christopher Johnson

RCJ/ls
ncca
attachment
cc: Official Representatives

APPENDIX B

Safety Data

Please complete this form to the best of your knowledge and return it with your plant's **OSHA 300** form for 2008. If you have not previously provided data from recent years to our office, you will need to fully complete this form and submit appropriate OSHA forms for 2005-2008. **PLEASE SUBMIT A SET OF FORMS FOR EACH PLANT**. Copy this form as necessary. Please return these forms by no later than **February 21, 2009**. You will receive a compiled report detailing aggregate results. **All individual company information will be kept confidential.**

Company Information:

Company Name: _____
Address: _____
Contact Person: _____
Telephone: _____
E-mail: _____

Plant Information:

Company Name: _____
Address: _____
Contact Person: _____
E-mail: _____

Part I. The Safety Committee (part of the Government Relations Committee) is attempting to derive additional value from the plants that are responding to the survey. To that end, the committee would like to compare the data between reporting plants. It is therefore important to understand the number of employees that are employed in positions that have a greater degree of safety risks. In your reported numbers, please indicate the number (ratio) of lower safety risk employees (i.e., office employees) and the number (ratio) of higher safety risk employees (i.e., plant employees who work with machinery) out of the total number of employees.

2008:	**Average Number of Employees:**	**Total Hours Worked:**
Office (Low Risk)	_____	_____
Plant (High Risk)	_____	_____
Total*	_____	_____

2007:	**Average Number of Employees:**	**Total Hours Worked:**
Office (Low Risk)	_____	_____
Plant (High Risk)	_____	_____
Total*	_____	_____

2006:	**Average Number of Employees:**	**Total Hours Worked:**
Office (Low Risk)	_____	_____
Plant (High Risk)	_____	_____

Total*	_____	_____

2005:	**Average Number of Employees:**	**Total Hours Worked:**
Office (Low Risk)	_____	_____
Plant (High Risk)	_____	_____
Total*	_____	_____

**Please provide the total number of hours, if you are unable to break out hours by plant/office.*

PART II. Please read each question carefully and answer candidly. Your answers will be kept confidential and will be reported in the aggregate. These questions are intended to assist member facilities with enhancing their current safety programs.

1. **What type of coil coating equipment does your plant utilize?**

   _____

2. **Does your company have a Safety Committee?**
   Yes ☐ No ☐

3. **If YES, please list each committee member's title or position at your company.**

   _____
   _____

4. **Currently, do you have any safety programs implemented to heighten safety awareness at your plant?**
   Yes ☐ No ☐

5. **If YES, briefly describe your safety program(s).**

   _____

6. **Has your plant conducted any safety training in the past 12 months?**
   Yes ☐ No ☐

7. **If YES, briefly describe the type(s) of safety training conducted at your plant in the past 12 months.**

   _____

8. **Currently, do you have any incentive programs that promote safe work practices at your plant?**

Yes ☐ ..... No ☐

9. **If YES, briefly describe your plant's incentive program(s) that promote safe work practices.**

_____

10. **If NO, why not?** _____

11. **When reporting injury/illness rates on the OSHA 300 form, are you including:**
    Office Employees Only ..... ☐
    Plant Employees Only ..... ☐
    Both Office & Plant Employees ..... ☐

12. **Based on what you reported on the OSHA 300 form for 2008, please provide a description of the lost time accident/injury per employee and the action taken to remedy the problem or cause.**

Description of Lost Time Accident/Injury: (For 2008 only)	**Action taken to remedy problem or cause: Please include any information on the implementation of new regulations, procedural changes for operations, or staff training/notification.**
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Thank You for Your Participation!

Please return this form **via e-mail** along with your completed OSHA 300A form for 2008 to

National Coil Coating Association
1300 Sumner Avenue
Cleveland, Ohio 44115
Fax: 216-241-0105
E-mail: ncca@coilcoating.org

APPENDIX C

2008 Report Participants

(35 Plants)

Aleris
American Metals
Canfield
Centria
Euramax
First American Resources
Metal Coaters
Mitsubishi Chemical
MSC
Nichols Aluminum
Plygem
Precoat
Prior Coated Metals
Roll Coater
Steelscape
SDI

APPENDIX D: ADDITIONAL INFORMATION

Question # 4
Currently, do you have any safety programs implemented to heighten safety awareness at your plant?

In March 2008 our plant was designated an OSHA VPP Star facility. The Voluntary Protection Programs (VPP) promote effective worksite-based safety and health. In the VPP, management, labor, and OSHA establish cooperative relationships at workplaces that have implemented a comprehensive safety and health management system. Approval into VPP is OSHA's official recognition of the outstanding efforts of employers and employees who have achieved exemplary occupational safety and health. Of the approximately seven million facilities eligible to apply for VPP, there are only 1500 VPP Star sites in the country. This program is one of our greatest achievements in the area of safety and demonstrates our total commitment to a safe workplace.

In addition, the following safety programs are utilized at American Metals to increase safety awareness

***Employee involvement is the core of Westlake/American Metal's safety plan*.** It is a core belief that each employee is responsible for his/her own safety rather than a dedicated safety inspector for the plant. Every employee has the responsibility to shut down a piece of equipment if they believe there is a safety concern with no fear of repercussions. The observation and elimination of unsafe acts is performed by every employee; employees will approach other employees to discuss an unsafe act they observed, stop it immediately, and explain the consequences of their actions and ask for a change in safety behavior.
JSAs (Job Safety Analysis) are written by employees for both routine and non-routine tasks. JSAs are not a set of task instructions but rather are used to identify and eliminate potential hazards associated with the task. JSAs are written by employees and reviewed by all employees who perform the task. Writing of JSAs is performed at the hourly employee level as they are most familiar with the tasks to be performed.
SOCs (Safety Observation Checklists) are performed as a review of JSAs and used as a training tool. During an SOC an employee performs a task while other hourly employees observe to verify that the steps outlined in the JSA are followed. This process identifies training needs for employees and improvements that need to be made to the JSA. In cases of non-compliance, SOCs are non-disciplinary. Each hourly supervisor coordinates a minimum of two SOCs per week. Supervisor participation is not mandatory and their role is to coach and facilitate the process.

> Extensive training is provided to employees on the JSA and SOC processes. Training is conducted by the Plant Manager and other managerial/supervisory staff. Classroom training is provided and extensive role playing utilized. A custom video was professionally produced documenting the SOC process. The video is used as a training tool which shows acceptable methods of providing feedback and suggestions for improvement.

The OSHA Compliance Checklist is an internal inspection based on OSHA requirements. The Checklist is performed in each department on a monthly basis utilizing hourly employees. The employees perform the month's assigned inspection noting any corrective action that is required. Corrective action is now

tracked in MP2 computer software as part of the RPM (computerized maintenance) system. Any item identified as "life/limb safety" concern is categorized "emergency work" and is performed immediately. Monthly inspections include: Spill Response, Hazardous Material Storage, Hand Held Tools, Walking/Work Surfaces, Bloodborne Pathogens, LOTO, Means of Egress, confined Space, General Environmental Controls, Occupational Health, PPE, Hazard Communication, Electrical, Recordkeeping, Fire Protection, Compressed Air, Medical/First Aid/AED, Vehicle Mounted Work Platform, Machine Guarding, Welding/Cutting, Material Handling & Storage.

Accident Investigations Teams are utilized for all incidents in which a doctor's care was involved and all ANI's (Accident No Injury) with a significant potential for serious injury or involving extensive property damage. Other ANI's may require a Team Investigation at the discretion of the Department Manager. The Team is comprised of different members each month (following a matrix published each year). Investigations occur promptly after the incident occurs. The following procedures are utilized following an incident:

- Secure the scene
- Preserve the scene
- Accident analysis
- Assemble team
- Perform accident investigation
- Initial communication to the plant
- Final communication to the plant accompanied by Accident Summary and appropriate photographs.

ANI reporting is used to recognize report and, if possible, correct any hazardous conditions or unsafe acts immediately. All employees report all ANIs. Hourly supervisors document the ANIs on their weekly supervisor safety reports.

Westlake/American Metals utilizes internal SAR (Safety Activity Rating) Inspections of the plant based upon the USG SAR Program. An internal SAR is performed by employees approximately every 12 months. The audit includes review of OSHA programs including: LOTO, confined space, hazard communication, crisis response, hearing conservation, mobile equipment, bloodborne pathogens, customer/contractor safety, respiratory protection and personal protective equipment. Extensive training is given to employees on how to conduct an inspection. Inspections are performed by hourly employees on all three shifts. The results and corrective action recommendations are reported back to the managerial staff at close-out meetings. Completion of corrective action is tracked through the RPM process utilizing MP2 software. The most recent internal SAR was conducted November 6-14, 2008.

External SAR audit – An External SAR is conducted approximately every two years by employees from another USG facility as part of USG's SAR Program. The plant will review the results to determine corrective action and a summary report will be sent to USG's Director of Occupational Safety. The last External SAR of American Metals was conducted in December 2007.

Safety one-on-ones (personal safety reviews) are conducted by the hourly supervisors the first quarter of each year. The reviews are conducted individually with each hourly employee to review the employees' safety performance over the past year. Critical incident logs are utilized as recordkeeping throughout the

year of specific incidents. Safety one-on-ones are separate from performance reviews and are permanent documents in each employee's personnel file.

Critical Incident Log (CIL) – A log is maintained by the hourly supervisor for each hourly employee in their group. The log documents contacts related to performance elements from our Hourly performance review program. The supervisor lists strengths and/or areas for improvement and makes the contact to the employee on that entry.

Daily safety huddles are presented by the hourly supervisors to the employees on their shift. Huddles are documented on the Supervisor Weekly Safety Activity Report. Subject matter varies greatly but includes review of ANIs, JSAs including revisions to JSAs, OSHA fatal facts, weather related topics (i.e. heat stroke prevention, slips/trips/falls warnings during icy weather). Sometimes, employees conduct safety huddles as a result of an ANI or a specific safety topic they wish to share with all other employees.

Focus groups are heavily utilized at Westlake/American Metals. Focus groups study and make suggestions for corrective action following injuries, accidents and ANIs; they are heavily involved in design and specification of new equipment; focus groups are utilized for problem solving relating to improvement in operations and quality. The current active focus groups include:

- Paint line optimization
- Slit line LOTO
- Slitter tool (wrench)
- Slitter blade & rubber tracking
- JSA Review

Groups completed in 2008 include Parrot Beak drum lifter attachment focus group and coil stacking focus group.

The Westlake/American Metals Safety Team consists of hourly employees from various departments. Team meetings and activities are coordinated by the Plant Manager. Their activities include administration of the Westlake/AMC Safety Incentive Plan and leading/conducting the internal SAR inspections.

Weekly Housekeeping / Fire Inspections – Hourly employees complete the various housekeeping and OSHA required inspections. Housekeeping is the core of a safe workplace.

Safety Inspections of Equipment – Hourly employees from production and maintenance complete safety inspections of the equipment along with tracking the follow-up items.

Pattern Analysis - Monthly safety reports are distributed to all managers, supervisors and engineering staff to be reviewed and posted in each supervisor's and manager's office/work areas for reference. All supervisors and managers must know department, shift, and plant safety statistics on a monthly and YTD basis. Statistics are compiled and distributed by the Human Resources Department. Safety reports are reviewed with the employees through bulletin board postings, quarterly Plant Manager Communication Meetings and Daily Safety Huddles.

Performance Appraisal and Development Plan (PA&D) – The performance objectives are developed and agreed upon by the hourly supervisors and salary staff at the beginning of each year. The plan lists the detailed assignments for the year in the areas of safety and employee relations. The PA&D year to date performance is reviewed two times per year and the final performance ratings are from the plan. **Department Managers, Foreman, Salaried Supervisors and Hourly Supervisors are rated only on safety and employee relations.**

Employee Contact Record - The Westlake/American Metals Plant supports the principle that there is no place in the organization for an employee who chooses to work in an unsafe manner. Such behavior endangers not only the individual, but also endangers the safety of his/her fellow employees. As is the case with all corrective action, the focus of disciplinary action is to ensure that the incident is not repeated. Whenever disciplinary action is warranted, it shall be exercised promptly after the occurrence with full regard to development of facts and complete fairness to all parties involved.

Company B Safety Policy

DISTRIBUTION:

SAFETY ACCOUNTABILITY BOOKS:

GENERAL DISTRIBUTION:

All Plant Managers
All Superintendents
Division HR Manager
NAC Safety Engineer
Division Safety Manager
NAL/NAA H.R. Manager
N-A Intranet

Vision: We regard safety as a core value and believe that all injuries - at work or at home - are preventable. We are therefore committed to continually improving our safety record to avoid the unnecessary suffering, cost and lost productivity associated with injuries. We seek a culture where employees think before they act, follow all safety requirements and fulfill these duties *not because they have to but because they want to.*

Goals: Our goals are to achieve and maintain OSHA frequency rates that are no more than twenty-five percent of our industry rates and be regarded among the safest aluminum companies in the world.

Strategies:

Executive Management Commitment

The President and his staff will actively demonstrate an exemplary commitment to safety in all they do and say. In addition, an Executive Safety Team will meet quarterly to review progress in our Key Success Factors and determine corrective actions, as necessary, for the overall safety effort.

An Effective Safety Program

The Safety and Health Policy will be reviewed and updated annually. This document describes management accountabilities and numerous safety programs and processes considered key to our success.

Employee Involvement

We must actively seek the advice and opinions of employees in matters pertaining to their safety and health. Managers will do this directly, through safety meetings and by involving employees in teams and projects according to their interest and expertise.

Accountability

Line and operations managers and employees will be held accountable for defined and proactive safety activities. All employees will be accountable for their actions. Also, in addition to complying with safety regulations, every employee is expected to "think through it before you do it."

RESPONSIBILITY:

Each employee plays a unique and vital role in the success of our safety efforts and is individually responsible for supporting those efforts in his/her area of responsibility. Plant managers and superintendents are individually accountable and responsible for the execution of our safety programs, for compliance with safety regulations and for the recognition and correction of known safety hazards. The Safety Manager is generally responsible for guiding and overseeing health and safety functions including compliance with OSHA and other safety and health regulations as a minimum level of safety performance.

PROCEDURE:

Our safety and health program will include, but not be limited, to the following programs and processes:

1. We establish annual safety goals for the upcoming fiscal year. For FY 2008, we have established a "target" TRIR (frequency) rate of 3.3, an approximately 36% improvement over FY 2007.

2. Each plant manager shall assure ample opportunity for employees to be actively involved in safety through safety teams or similar committees that meet regularly and facilitate candid communication and promote prompt action on safety concerns.

3. "Safety Alerts": To communicate and facilitate an immediate response to accidents and significant close calls throughout our company, operations managers share, by e-mail, a summary of the incident and corrective actions that might be leveraged throughout the organization. The alerts are then reviewed by the Safety/Consistency Team to initiate uniform corrective actions.

4. Air quality program: Periodic sampling for air contaminants will be conducted according to plant processes and the recommendations of qualified industrial hygienists. Analysis is also considered

whenever concerns are expressed by employees or new or altered processes may potentially impact air quality.

5. Ergonomics is considered a Key Success Factor in safety. We will continue to utilize a variety of approaches to mitigating ergonomic risk factors including a professional ergonomist to lead employee involvement teams.

6. Team Leader Development: Focused training will improve safety skills among our hourly operators and hourly team leaders.

7. Periodic physical inspections and "Safety WalkArounds". Each plant has local programs to involve employees and managers in frequent programmed inspections for safety, housekeeping and environmental concerns.

8. Quarterly Executive Safety Meetings: Begun in 2003, this program will continue and will be coordinated by the Division Safety Manger.

9. Executive Plant Inspections: One plant is chosen for inspection each month and inspected by two members of the President's staff plus one safety professional and the location's operations managers and superintendents. Findings will be reported to the Division President and respective Operations Managers for follow-up.

10. Management Monthly Safety Checklist: Each month, operations managers are responsible for selecting and completing a topical checklist for the purpose of reviewing compliance with specific OSHA or our safety requirements. The Division Safety Manager has supplied more than twenty such checklists for this program that is intended to increase accountability and maintain or improve compliance.

11. Monthly safety and/or environmental training shall be provided for employees. The training will be administered at the departmental level and include opportunity for discussion and question/answer period. Operations personnel shall coordinate such training. Safety personnel will supply the training topics and materials for each month.

12. Each newly hired employee will be provided safety orientation in a classroom setting and be provided with a copy of and sign off on our safety rules. Superintendents are responsible for making this happen. Safety or Human Resources also review our safety policies with the employee before placement.

13. The "Lessons Learned" report is a list of recordable injuries occurring during the prior month and includes corrective actions or "lessons learned". The Safety Manager publishes this to superintendents and others to promote safety awareness and leverage corrections throughout our company. The report is posted and discussed in safety meetings etc.

14. "Top Safety", a monthly periodical, is distributed to employees' homes.

15. Each location maintains a drug and alcohol policy and program that complies with applicable regulations and that includes pre-employment, post-accident and reasonable suspicion testing as well as education/awareness procedures for supervisors and employees.

16. All employees are authorized and encouraged to stop any process if it is sincerely believed that there is imminent danger of injury. Likewise, all employees are authorized and encouraged to write maintenance or safety work orders to correct recognized physical hazards.

17. Supervisory personnel are periodically trained in accident investigation and root cause analysis. Complete accident investigations are required for recordable injuries, sprains/strains, "close call" and property damage incidents.

18. Record keeping: Human Resources shall maintain safety records including but not limited to OSHA 300 logs, accident investigations, and workers' compensation claim records. The Division Safety Manager, maintains a database of all injuries that permits analysis for trends, etc. The Division Safety Manager also disseminates monthly reports regarding safety results including injury frequency and severity rates according to Bureau of Labor Statistics methods.

19. Each location has established and will enforce safety rules and regulations pertaining to employees, contractors and visitors. This will require the cooperation of all employees.

22. Employees shall follow designated walkways established throughout the plant to facilitate uniform, safe areas of travel for employees, contractors, and visitors. Exceptions shall include employees who are working in the area or in the event of a Cardox discharge.

23. We encourage rewards and celebrations to promote safe behaviors. Any safety incentive program must be approved by Human Resources to ensure compliance with compensation laws and regulations.

24. Job Safety Analysis (JSA) shall be used to identify and control hazards through engineering and/or administrative means. In 2004, a campaign was begun to formalize all work instructions into a uniform JSA format.

25. Safety/HR personnel, working with our workers' comp carrier and treating physicians, shall coordinate an effective Return to Work (RTW) program.

26. Injuries shall be reported to our workers' compensation carrier according to established procedures for timely notice of loss. This requires prompt accident investigation by the injured employee's supervisor (within 24 hours) and prompt forwarding of the injury report to the insurance company by Human Resources.

27. Plant Managers, Superintendents, Supervisors and Department Leads are accountable for safety results and performance within their areas of responsibilities. To that end, safety shall be part of each employee's job performance, evaluation, and incentive compensation.

28. The Division Safety Manager shall promptly report all serious safety/health incidents to Corporate Human Resources Office.

29. The President will provide copies of all correspondence or reports from a government agency or outside third party to the Corporate Human Resources Office.

30. Before any commitment or agreement, with regard to any enforcement action, is made with any government agency or outside third party, the President shall obtain approval from corporate counsel.

31. OSHA Inspections: The Division Safety Manager has provided a list of suggested procedures to operations managers to be followed in the event of an inspection by OSHA. We will not tolerate retaliation of any kind against any employee for filing a report or complaint with OSHA.

32. Crisis communications: Each location's safety coordinator is responsible for ensuring the periodic review and updating of crisis communications policy and assignments according to Crisis Communications Handbook.

33. AEDs: To supplement local first aid/CPR programs, each location will have automated external defibrillators and, annually, will train a sufficient number of employees to operate these devices.

34. Prevention of Workplace Violence: Each location shall adhere to Policy V - 12 "Violence in the Workplace" to prohibit threatening, disruptive or violent behavior that could threaten the security of our associates.

35. In addition to the programs and policies described above, the following OSHA compliance programs will be maintained:

OSHA COMPLIANCE PROGRAMS	**STATUS/COMMENT** FP = Functional Program NA = Not Applicable UD = Under Development
a. Confined Space Entry Program 1910.146	FP, all locations
b. Hazard Communication 1910.	FP, all locations
c. Occupational Noise Exposure/Hearing Conservation 1910.95	FP, all locations
d. Hazardous Energy Control (Lock, Tag & Try) 1910.147	FP, all locations
e. Machine Guarding 1910 Subpart O	FP, all locations
f. First Aid 1910.151and Bloodborne Pathogens Exposure Control Plan 1910.1030	FP, all locations
g. Respiratory Protection 1910.134	FP, all locations

h. Emergency Action Plan 1910.39	FP, all locations
i. Written Fire Prevention Plan 1910.39	FP, all locations
j. Mobile Equipment, i.e. Powered Industrial Trucks 1910.178, Aerial Lifts 1910.67, Scissor Lifts (See ANSI/SIA A92.6-1990, Self-propelled Elevated Work Platforms), End loaders etc.	FP, all locations
k. Process Safety Management for Highly Hazardous Chemicals 1910.119	Not presently required
l. Lead – Compliance Program 1010.1025	N/A
m. Crane, hoist, sling and rigging safety 1910.179	FP, all locations
n. Electrical Safe Work Practices 1910.331 - .335 including compliance with NFPA 70E	FP, all locations
o. Hot work, Welding and Cutting 1910 Subpart Q	FP, all locations
p. Fall Protection/Prevention 1910 Subpart O and 1926.500 – 1926.503	FP, all locations
q. Personal Protective Equipment Program 1910.132	FP, all locations
r. Radiation Safety per 1910.1096 or specific NRC or state license requirements	FP, all locations
s. Asbestos (Awareness Level) 1010.1001	FP NAD, NAL, NAA N/A at NAC

CHANGES AND REASONS

Date	Revision
05/10/04	NEW
11/14/05	Revised as follows: Removed Scope and replaced with Vision, Goals, and Strategies; Revised to reflect organizational changes; Revised to reflect current goals; Added 4 & 5 Safety Alerts and Ergonomics.
09/18/06	Added #22 "Employees shall follow designated walkways established throughout the plant to facilitate uniform, safe areas of travel for employees, contractors, and visitors. Exceptions shall include employees who are working in the area or in the event of a Cardox discharge."
9/25/06	Reworded provision for Air Quality Program; Updated annual goal; Added Team Leader Development program; reworded Safety WalkAround program; Reworded executive plant inspections; Reworded Human Suffering Report program; Made Top Safety periodical program a separate program and reworded JSA program.
11/16/07	Removed Accountability Program, Petersen Perception Survey and SafeStart™ programs. Reworded appropriately.