

*Solidarity House*

8000 EAST JEFFERSON AVE.  
DETROIT, MICHIGAN 48214  
PHONE (313) 926-5000  
FAX (313) 823-6016



---

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA - UAW

---

DENNIS D. WILLIAMS, *PRESIDENT*      GARY CASTEEL, *SECRETARY-TREASURER*  
VICE-PRESIDENTS: CINDY ESTRADA • NORWOOD JEWELL • JIMMY SETTLES

July 18, 2016

Mr. Allen Clarke, Vice President  
Aerospace Labor and Employee Relations  
Honeywell Inc.  
115 Tabor Road  
Morris Plains, NJ 07950

Dear Mr. Clarke:

The UAW Health and Safety Department has uncovered a number of concerns related to the South Bend facility. In order to follow up on those concerns and to help the union consider additional health and safety proposals, I am requesting that the Company grant the Union access to the plant to conduct a health and safety review.

In solidarity,

Rudy Gomez  
Coordinator  
UAW National Aerospace Department

RG:jc  
opeiu494

# Honeywell

August 9, 2016

Rudy Gomez  
Coordinator  
UAW Aerospace  
Solidarity House  
8000 East Jefferson Avenue  
Detroit, MI 48214

Via email to [rgomez@uaw.net](mailto:rgomez@uaw.net)

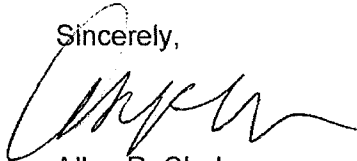
Dear Rudy,

This letter is in response to your letter dated July 18, 2016, post marked July 21, 2016, and received by me on July 28, 2016. As you know from my prior communication, and as we both have done throughout these negotiations, sending at least a copy of any correspondence to me via email will help assure timely receipt and response.

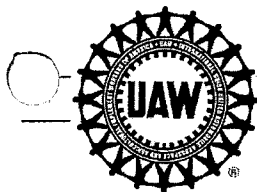
Your letter requests union access to the South Bend facility to "follow up on" a "number of concerns" the union has allegedly "uncovered" related to the South Bend facility. Please explain how this request is related to your representational duties. Also, please explain exactly what the concerns are and what information you are looking for so the Company can evaluate your request.

Your letter also requests access to the plant to conduct a "health and safety review" in order to "consider additional safety and health proposals." Please explain exactly what information you are looking for and why access to the plant is necessary to obtain the information, particularly in light of the fact that four members of the bargaining committee have worked in the South Bend facility for a combine time of more than 35 years and are presumably very knowledgeable about overall health and safety at the facility. The Company needs this information in order to evaluate your request.

Sincerely,



Allen R. Clarke  
Vice President, Labor and Employee Relations, Aerospace



INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA - UAW

DENNIS D. WILLIAMS, *PRESIDENT*      GARY CASTEEL, *SECRETARY-TREASURER*  
VICE-PRESIDENTS: CINDY ESTRADA • NORWOOD JEWELL • JIMMY SETTLES

August 16, 2016

Allen R. Clarke  
Vice President, Labor and Employee Relations, Aerospace  
Honeywell International Inc.

Dear Mr. Clarke,

This letter responds to your August 9, 2016 letter requesting additional information about the Union's request for access to the South Bend facility to conduct a health and safety review. The health and safety of employees are terms and conditions of employment and mandatory subjects of bargaining.

The Union's request to access the facility, and the Union's rescission of the Local 9 tentative agreement on health and safety, stem from the participation of several bargaining unit members in a best-practices seminar led by the UAW Health and Safety Department. After that seminar, several Honeywell bargaining unit members raised concerns about certain possible unsafe practices at the South Bend facility. Those unit members thereafter met with our Health and Safety Department and the following concrete issues were raised:

- Dichromate – improper handling and disposal, improper cleaning of residue that attaches to clothing workers wear outside that plant and at home.
- Isocyanate paint and chromate primers - improper use.
- Combustible dust buildup -- improper ventilation in the carbon machine shop.
- Hazardous Waste -- Absence of decontamination process for employees who handle hazardous waste. Inappropriate handling and storage of hazardous waste.
- Machine light curtains -- incorrect wiring throughout the plant.
- Air scrubber in the Anodizing Department – improper exhaust mechanism.

- Exhaust Hoods – improper maintenance and control of aerosols in the binary and AO paint rooms.
- Mold Press area in Carbon -- Water has been observed dripping onto electrical boxes.

The only reasonable way for the UAW Health and Safety Department to address these concerns is to have access to the facility and observe operations first-hand. Please contact me as soon as possible so that we can schedule a time for the UAW Health and Safety Department to fully investigate, inspect, observe and conduct a complete health and safety review of the facility. The Union intends to develop a comprehensive bargaining proposal to address any issues that come up during the review process. I trust that Honeywell will be a full partner in this effort to make the facility an industry leader in health and safety.

Sincerely,

*Rudy Gomez*

Rudy Gomez  
Coordinator  
UAW Aerospace

RG/lh  
opeiu494/afcio

# Honeywell

August 23, 2016

Rudy Gomez  
Coordinator  
UAW Aerospace  
Solidarity House  
8000 East Jefferson Avenue  
Detroit, MI 48214

Via email to [rgomez@uaw.net](mailto:rgomez@uaw.net)

Rudy,

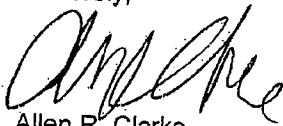
This letter responds to your August 16, 2016 letter identifying the specific areas of concern for which you seek access to the South Bend facility. We are not aware of any health and safety issues in the areas you identified, but appreciate any opportunity to assure the UAW's Health and Safety Department that we are operating safely. We especially appreciate the opportunity to facilitate the resumption of negotiations on our new contract.

Accordingly, we would be happy to provide access to the areas identified in your letter so that you can complete your revised proposal. We can accommodate a member of the UAW's Health and Safety Department the week of September 12, 2016. We assume that you or another member of your bargaining team will want to accompany the union's health and safety expert. A company HSE leader and a member of the company bargaining team will accompany you at the site.

Please let me know as soon as possible which date you prefer and provide the names of the union's health and safety expert and bargaining team member who will participate in the visit, along with confirmation of whether each is a U.S. citizen (for ITAR compliance purposes). Consistent with the union's stated purpose in requesting access to the facility, we expect and hope the union will agree that the information gathered during the visit will be used solely in connection with our collective bargaining negotiations and not disseminated for any other purpose.

While we are in South Bend, can we also plan to resume negotiations?

Sincerely,



Allen R. Clarke  
Vice President, Labor and Employee Relations, Aerospace



*Solidarity House*

8000 EAST JEFFERSON AVE.  
DETROIT, MICHIGAN 48214  
PHONE (313) 926-5000  
FAX (313) 823-6016

---

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA – UAW

---

DENNIS D. WILLIAMS, *PRESIDENT*      GARY CASTEEL, *SECRETARY-TREASURER*  
VICE-PRESIDENTS: CINDY ESTRADA • NORWOOD JEWELL • JIMMY SETTLES

August 24, 2016

Allen Clarke  
Vice President, Labor & Employee Relations, Aerospace  
115 Tabor Rd.  
Morris Plains, NJ 07950

Dear Allen,

This is in response to your August 23, 2016 letter. I will let you know who will accompany the UAW Health & Safety Representatives as soon as possible. We also look forward to resuming negotiations during that week.

Prior to these negotiations, the Company presented a business overview in which it explained the challenges we face with respect to internal process quality, customer satisfaction rankings and other performance issues. Ironically, the issues that divide the parties today do not relate to the challenges identified by the Company in its business overview. I suggest we refocus the bargaining to address those core challenges, especially if it is true that the Company is facing ISO re-certification issues in South Bend. I believe the experienced UAW bargaining unit employees can help. To that end, I request that the Company end the lockout, return these experienced employees to work and ensure that we do not lose the confidence of our customers.

I also suggest that the parties immediately utilize the various tools and training offered by the Federal Mediation and Conciliation Service related to labor management cooperation. I would be happy to check on the availability of a FMCS mediator/trainer for the week of September 12, 2016.

Finally, I do not believe the Company has responded to my August 9, 2016 letter regarding Letters of Agreement; Memorandums of Understanding and other Ancillary Agreements or my August 11, 2016 letter regarding subcontracting. I would appreciate the Company's responses as soon as possible.

Sincerely,

Rudy Gomez, Coordinator  
UAW National Aerospace Department

RG:blp  
opeiu494/afl-cio

cc: Ginny McMillan  
Scott Sommer

# Honeywell

September 13, 2016

Rudy Gomez  
Coordinator  
UAW Aerospace  
Solidarity House  
8000 East Jefferson Avenue  
Detroit, MI 48214

Via email to [rgomez@uaw.net](mailto:rgomez@uaw.net)

Dear Rudy,

This confirms that Andrew and Adam have completed your requested safety tour of the South Bend plant. We showed them all of the areas you requested in your letter.

We were very surprised that the union representatives showed up at the plant with cameras and test equipment, which goes well beyond anything you requested of us. So you know, we did offer to take photos for them upon request during the tour and to consider sharing those later.

We look forward to resuming negotiations tomorrow.

Sincerely,



Allen R. Clarke  
Vice President, Labor and Employee Relations, Aerospace



*Solidarity House*

8000 EAST JEFFERSON AVE.  
DETROIT, MICHIGAN 48214  
PHONE (313) 926-5000  
FAX (313) 823-6016

---

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA - UAW

---

DENNIS D. WILLIAMS, *PRESIDENT*      GARY CASTEEL, *SECRETARY-TREASURER*  
VICE-PRESIDENTS: CINDY ESTRADA • NORWOOD JEWELL • JIMMY SETTLES

September 14, 2016

Allen Clarke  
Vice President, Aerospace  
Labor & Employee Relations  
Honeywell Aerospace

Dear Allen:

This is in response to your September 13, 2016 letter. As you well know, our Health & Safety review is not complete. Further, the Company did not provide full access to the areas we requested and the Company did not honor its agreement to take the photos we requested.

I find your expression of surprise, that our Health & Safety expert brought along a camera and test equipment, to be insincere. On August 16, 2016, pursuant to your request, we identified specific concerns as follows:

- **Dichromate** – improper handling and disposal, improper cleaning of residue that attaches to clothing workers wear outside that plant and at home.
- **Isocyanate paint** and **chromate primers** - improper use.
- **Combustible dust buildup** -- improper ventilation in the carbon machine shop.
- **Hazardous Waste** -- Absence of decontamination process for employees who handle hazardous waste. Inappropriate handling and storage of hazardous waste.
- **Machine light curtains** -- incorrect wiring throughout the plant.
- **Air scrubber** in the Anodizing Department – improper exhaust mechanism.
- **Exhaust Hoods** – improper maintenance and control of aerosols in the binary and AO paint rooms.
- **Mold Press area in Carbon** -- Water has been observed dripping onto electrical boxes.



In that letter we also stated that we would like to schedule a time, "...for the UAW Health and Safety Department to fully investigate, inspect, observe and conduct a complete health and safety review of the facility." Obviously, we intended a comprehensive investigation. Many of the concerns we specifically listed cannot be evaluated with the naked eye. Again, it is insincere for the Company to express surprise that a Health and Safety expert would bring a camera and test equipment along for use during an investigation.

During the plant visit, Company representatives took every opportunity to impede our investigation including informing us that we had a maximum of one hour in the plant, refusing to honor their agreement to take the photos we requested and being unwilling or unable to answer questions regarding safety issues. It was especially discouraging that Company representatives refused to address at least two obvious safety hazards identified by our expert during the plant visit simply because they were not included in our August 16, 2016 letter.

Company representatives informed us that it would take three days to process a request to bring a camera and test equipment into the plant. This requirement seems calculated to obstruct our investigation and waste the time our Health and Safety Department set aside to do the investigation. Please consider this our written request. We are prepared today to answer any questions about our investigation and testing methods. As a Vice President of the Company, we hope that you can get the appropriate Company officials involved immediately and give us an answer quickly so we can conduct the necessary testing this week.

Sincerely,

*Rudy Gomez*

Rudy Gomez  
Coordinator  
UAW National Aerospace Department

RG/ks  
opeiu494/afl-cio

# Honeywell

September 15, 2016

By Hand

Mr. Rudy Gomez  
Coordinator  
UAW National Aerospace Department

Dear Mr. Gomez:

I write to correct a number of grossly inaccurate assertions made in your September 14, 2016 letter regarding the safety inspection that the Company permitted at the union's request on September 13, 2016.

As you know from our correspondence on this subject, the Company agreed to permit union representatives, including a member of the union's safety and health department, to enter the plant to access specific areas identified by the union. The Company fully complied with the union's request.

Your assertion that a one hour time limit was placed on the visit is false. UAW International Representative Adam Stevenson and UAW Health and Safety Department Coordinator Andrew Comai spent more than 90 minutes at the plant and were given access to all the areas specified in the union's request. At no time did the Company restrict the amount of time in the plant, nor did your representatives request additional time.

Your assertion that the Company was insincere in expressing its surprise that your representatives showed up with monitoring and recording equipment is also wrong. To the contrary, the union appears to have been more intent and focused on trying to create an unfair labor practice charge than addressing legitimate safety concerns. In order to set up your request, you withdrew your tentative agreement on safety. You then never requested to bring equipment, conduct tests, record or otherwise monitor at the plant. As a long-standing employee of the plant, Mr. Stevenson should be well aware of the plant policies and procedures that require advanced approval before recording equipment is permitted on site. The union's goal seems to have been clearly articulated by Mr. Comai when he told the Company's representative "I want you to say no so I can go file a labor charge." The Company's representatives remained professional at all times and continually advised that the Company would follow its normal process in reviewing any requests.

Enclosed are copies of the Safety Data Sheets Mr. Comai requested while at the plant. I am also sending you copies of the photographs Mr. Comai requested during the visit via email along with an additional copy of this letter.

The Company is now in receipt of the union's extensive request for additional information and will respond appropriately as we work through those items.

Sincerely,

A handwritten signature in dark ink, appearing to read "AR Clarke", written in a cursive style.

Allen R. Clarke  
Vice President, Labor and Employee Relations, Aerospace  
Honeywell International Inc.



---

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA – UAW

---

*Solidarity House*

8000 EAST JEFFERSON AVE.  
DETROIT, MICHIGAN 48214  
PHONE (313) 926-5000  
FAX (313) 823-6016

DENNIS D. WILLIAMS, *PRESIDENT*      GARY CASTEEL, *SECRETARY-TREASURER*  
VICE-PRESIDENTS: CINDY ESTRADA • NORWOOD JEWELL • JIMMY SETTLES

September 16, 2016

Allen Clarke  
Vice President, Aerospace  
Labor & Employee Relations  
Honeywell Aerospace

Dear Allen:

This is in response to your September 15, 2016 letter. You again claim that the Company fully complied with the Union's request to conduct a health and safety review. Please recall that the Union requested the opportunity to "fully investigate, inspect, observe and conduct a complete health and safety review of the facility." The Company has repeatedly used the Union's August 16, 2016 letter, which identified several areas of specific concern, to limit the scope of the review. The Union provided that letter in good faith, pursuant to the Company's request, to show that our members have a number of specific concerns. By identifying specific concerns, the Union did not intend to limit its review of the facility. The Union is again requesting full access to all areas of the facility where our members have access during the work day. We are requesting to do a comprehensive review that will include taking pictures and samples. This review will take more than 90 minutes. The review may require multiple visits. The review will require access while the plant is operating and may well require access to some areas and operations when they are not operating. The Union is willing to discuss its testing methods and agree on a schedule that will least affect production.

We asked Honeywell to be a full partner in this effort and help us make the facility an industry leader in health and safety. Instead, Company representatives informed us that we had a maximum of one hour in the plant, refused to honor their agreement to take the photos we requested (including photos of beryllium swarf and what appeared to be an unrated homemade lifting device on the zyglow line), refused us the opportunity to review dichromate handling and storage, refused us the opportunity to observe the hazardous waste building, refused to discuss, or allow us to inspect, anything outside the specific concerns identified prior to the tour, refused to take notes regarding our questions and concerns, and were generally unwilling or unable to answer the most basic questions related to the Company's health and safety practices. The Company's attempt to limit and hinder our health and safety expert's investigation shows that the Company is not willing to be a partner in this effort. That is why we filed an NLRB charge. As soon as the Company lives up to its legal obligation and allows our expert to complete the investigation, the Union will be happy to withdraw the charge.

Although in your letter you state that you enclosed copies of the Safety Data Sheets (SDS) we requested, you only enclosed a portion of the required information. We requested chemical SDS for the two component paint, but you only enclosed Part A of the paint involved and failed to supply the SDS for

Part B of the paint. This information is essential to determining the scope and techniques to be used for collecting and analyzing samples as well as the personal protection equipment our expert will need during future plant visits.

I think the most disturbing part of the Company's response to my September 14, 2016 letter is that neither you, nor any other Company representative inquired about the safety hazards identified by our expert during the plant visit. He observed a fall hazard on top of the paint room consisting of a fixed ladder with obstructions at the top and inadequate barrier chain at the landing. He attempted to stop and have a discussion with Company representatives about the load rating of a suspicious lifting hook on a zyglow line, but Company representatives refused. He also observed a maintenance person in the Anodizing Department not wearing chemical protective clothing or a respirator. Please add those items to the areas of specific concern.

I hope this letter clears up, once and for all, the scope of the health and safety review requested by the Union. Please provide me a copy of the plant policies and procedures, cited in your letter, that require advanced approval before recording equipment is permitted on site. Let me know immediately if you need more information or if the Company has any additional procedural requirements so that we can avoid wasting any more time.

Sincerely,

*Rudy Gomez*

Rudy Gomez  
Coordinator  
UAW National Aerospace Department

RG/cms  
opeiu494/afl-cio

cc: Ginny McMillin  
Scott Somer