

ISSUE: SAFETY AND HEALTH VIOLATIONS
ARTICLES 14 & 19

DOCUMENTATION	EXPLANATION
All grievance paperwork	All paperwork developed and utilized in grievance procedure
Applicable regulations EL-801 - 814, ELM Chapter 8	Establishes work rules and criteria
If applicable, written notes from facility representatives	1999 Memo of Understanding applicable to all plants, bulk mail centers, airmail centers, district main post office (including stations and branches), and vehicle maintenance facilities. Helps clarify parties' position and what if any action contemplated or taken
Copy of 1767	Basis for the dispute. Also proves safety hazard has been reported
Copy of 1769, if applicable	If safety hazard has caused an accident, accident report should be included
Witness Statements	Statements from employees that are affected by the safety hazard. Statements must be specific and to the point
When appropriate, diagram or other visual aid of area where safety hazard exists	Helpful aid so that others may "see" the area where the safety hazard exists
If applicable, safety captain's written meeting notes	Identifies APWU contact person who has been involved in dispute and what if any steps were contemplated or taken
Minutes from any local safety meetings addressing the issue	Should clarify dispute and what action, if any, has been taken
Any letter or inter-office memos regarding the issue	Tells us management's position and what action should take place or is planned
If applicable, Material Safety Data Sheet, and/or container warning labels, newspaper or magazine articles, and educational materials that support the of claim of a safety hazard	Good background information May establish management obligations Helps prove violation

Applicable case law. Remember difference between precedent and persuasive value	Strengthens case through Step 4s, national arbitrations or pre-arbs, regional arbitrations or pre-arbs. Cites must be on point
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