PLAINTIFF'S EXHIBIT MON-280

ATTACHMENT II

Revised

TRAINING & EDUCATION IN PROPER USE OF RESPIRATORS

For safe use of any respirator, it is essential that the user be properly instructed in its selection, use, and maintenance.

Minimum training shall include the following:

1. Instruction in the nature of the hazard, whether acute, chronic, or both, and an honest appraisal of what may happen if the respirator is not used.

2. Explanation of why more positive control is not immediately feasible. This shall include recognition that every reasonable effort is being made to reduce or eliminate the need for respirators.

3. A discussion of why this is the proper type of respirator for the particular purpose.

4. A discussion of the respirator's capabilities and limitations.

5. Instruction and training in actual use of the respirator (especially a respirator for emergency use) and close and frequent supervision to assure that it continues to be properly used.

6. Classroom and field training to recognize and cope with emergency situations.

7. Other special training as needed for special use.

Training shall provide the individual an opportunity to handle the respirator, have it fitted properly, test its facepiece-to-face seal, wear it in normal air for a long familiarity period, and, finally, to wear it in a test atmosphere as described below.

FACEPIECE FIT TESTS AND PROCEDURES

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Every respirator wearer shall receive fitting instructions including demonstrations and practice in how the respirator should be worn, how to adjust it, and how to determine if it fits properly. Respirators shall not be worn when conditions prevent a good face seal. Such conditions may be a growth of beard, sideburns, a skull cap that projects under the facepiece, or temple pieces on glasses. Also, the absence of

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FACEPIECE FIT TESTS AND PROCEDURES

one or both dentures can seriously affect the fit of a facepiece. The worker's diligence in observing these factors shall be evaluated by periodic checks.

To assure proper protection, the facepiece fit shall be checked by the wearer each time he puts on the respirator. This may be done by these two simple field tests:

1. Positive Pressure Test. Close the exhalation valve and exhale gently into the facepiece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the facepiece without any evidence of outward leakage of air at the seal. For most respirators, this method of leak testing requires that the wearer first remove the exhalation valve cover and then carefully replace it after the test.

2. Negative Pressure Test. Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the seal(s), inhale gently so that the facepiece collapses slightly, and hold the breath for ten seconds. If the facepiece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is probably satisfactory.

Potential users of respirators should also be required to test their facepiece fit by wearing the respirator under realistic test conditions. A bottle of isoamyl acetate (available from Industrial Hygiene) can be used for this test. The wearer should put on the respirator in the normal manner, an open bottle of isoamyl acetate held near the breathing zone. If the odor is detected, the wearer should readjust the facepiece and repeat the test.

If leakage is still noted, it can be concluded that this particular respirator will not protect the wearer. The wearer should not continue to tighten the headband straps until they are uncomfortably tight, simply to achieve a gas-tight face fit. If fitted too tightly, the wearer will not wear the respirator or will wear it fitting comfortably loose and will not have a gas-tight seal.

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RESPIRATORY PROTECTION PROGRAM

PURPOSE

To establish a Respiratory Protection Program which will set overall objectives and policies for the selection, maintenance, training and use of all respiratory protective equipment at Chocolate Bayou Plant.

SCOPE

This procedure covers respiratory protective equipment for both normal and emergency situations.

The equipment and procedures specified are considered to be those required to maintain safe and healthy working conditions.

POLICY

In the control of occupational exposure to air contaminated with harmful gases, dusts and fumes, the primary objective shall be to prevent atmospheric contamination. This shall be accomplished as far as feasible by accepted engineering controls and good work practices. When effective engineering controls are not feasible, or while they are being initiated, appropriate respiratory equipment shall be used.

The company will provide respiratory protection equipment which is applicable and suitable for the purpose intended, when such equipment is necessary to protect the health of the employee.

The employee will use the provided respiratory protection in accordance with instructions and training received.

PREMISE FOR RESPIRATORY PROTECTION PROGRAM

The following are the basic premises for an acceptable Respiratory Protective Program:

1. Written departmental operating procedures will define the proper selection and use of respiratory protective equipment. Selection will be based on:

   a. Nature of hazardous operation.

   b. Type and concentration of air contaminants.

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c. Period of time for which protection must be provided.

d. Functional and physical characteristics of the protective device.

2. Users should be adequately trained in the use and limitations of the protective equipment. Training will include information presented in Attachment II (attached).

3. Where practical, respirators will be assigned to an individual. These routinely used respirators must be cleaned regularly, inspected before each use, and repaired as necessary to insure proper protection.

4. Respiratory equipment must be stored in convenient, clean, sanitary locations.

5. There should be regular inspections and evaluations to determine the continued effectiveness of the respiratory protection program.

HAZARDS

The classification of breathing hazards and recommended protective equipment is presented in Table I (attached).

RESPONSIBILITIES

Departmental Supervision is responsible for:

1. Providing written operating procedures for selection and use of breathing protection.

2. Insuring adequate breathing equipment is provided for all situations requiring its use within that department.

3. Proper storage, identification and inspection of the equipment in the department.

4. Insuring personnel in their department are adequately trained. A detailed training and fitting guideline is presented in Attachment II.

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5. Maintaining records of training (name, date, type of equipment).

RESPIRATORY PROTECTION PROGRAM

Industrial Hygiene Department is responsible for:

1. Specifying proper equipment.
2. Providing Stores with a list of approved equipment for purchase.
3. Training supervision in the use of respiratory equipment.
4. Inspections and evaluations to determine effectiveness of Respiratory Protection Program.

Safety Department is responsible for

1. Training supervision in the use of respiratory equipment.
2. Training of new employees.

Stores is responsible for:

1. Maintaining an adequate supply of approved respiratory equipment.
2. Providing services for collection, cleaning, repair, repackaging, restocking of respirators as required.

PROCEDURES

I. Requirements to obtain equipment.

Non-routine use

A. When a need has been established, the using department will complete a respiratory equipment request form (Attachment I).

B. The completed request will be reviewed by the Industrial Hygiene and/or Safety Departments for approval.

C. The approved form can then be taken to Stores, where the required equipment will be provided.

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Personal Issue for Routine Use

A. Departmental supervision in consultation with Industrial Hygiene Department will determine need, type and numbers of

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equipment needed.

B. As specified by Industrial Hygiene, Stores will stock the appropriate equipment.

C. Department supervision will return used respirators and obtain new ones at least once per year (as per schedule in Attachment III) or more frequently if needed. Broken or malfunctioning respirators can be turned in to Stores for a replacement at anytime.

II. Procedures for use of the various kinds of breathing protection.

Following are listed the various types of devices currently in use in the plant and procedures for their use. Any new applications should be carefully considered and selection should be made only after consultation with Industrial Hygiene and Safety Departments.

A. Self Contained Air Mask Systems (15 and 30 Minute MSA Air Pacs).

THIS EQUIPMENT IS INTENDED FOR SHORT-TERM EMERGENCY WORK IN CONTAMINATED ATMOSPHERES (i.e. ATMOSPHERES WHICH IRRITATE OR POISON THROUGH THE SKIN, SUCH AS HCN, CONCENTRATED AMMONIA, HF, ETC.). THE 30 MINUTE UNIT IS APPROVED FOR USE WITH THE VAPOR SUIT. THE 15 MINUTE UNIT IS FOR SHORT DURATION WORK BUT HAS A LIMITED AIR SUPPLY NOT ADEQUATE FOR VAPOR SUIT USE.

1. The Safety Department has the responsibility to inspect and maintain the 30 minute MSA air mask. The owning department will inspect and maintain other respiratory protective equipment.

2. The owning department will train on this equipment at least once per year. The Safety Department will provide training aids and assistance in this training effort.

B. Escape Masks 6113 17246 B001798

1. Only Robert Shaw (formerly Lear-Siegler) self contained, pressurized air unit with a hood shall be used as an

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escape mask.

2. The owning department will inspect this equipment weekly.

3. The owning department will train on the proper use of this equipment at least once per year.

C. Supplied Breathing Air Systems

1. Monsanto Maintenance Breathing Air System (Portable Manifold).

a. The Maintenance Department is the owner of this system and has the responsibility for its use and maintenance.

b. The Safety Department shall be contacted when it is to be used, to insure that the using personnel have been trained in its use.

NOTE: ONLY BOTTLED BREATHING AIR THAT HAS BEEN VERIFIED AND TAGGED BY THE SAFETY DEPARTMENT TO CONTAIN 20.8% OXYGEN SHALL BE USED IN THIS SYSTEM.

(1) The Safety Department must be notified when breathing air is brought into the plant, both for Monsanto and contract personnel

(a) They will verify the oxygen content to be 20.8%.

(b) They will then place a dated and initialed tag on the bottle.

(2) Stores will notify the Safety Department when breathing air is brought into the plant through normal deliveries.

(3) Maintenance or CED supervision will notify the Safety Department when breathing air is brought into the plant by an outside contractor.

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2. Air Compressor Systems

THE PLANT COMPRESSED AIR SYSTEM MUST NEVER BE USED FOR BREATHING AIR SUPPLY.

a. The only air compressor systems for breathing air in this plant are:

(1) Fixed system in the SAB Department.

(2) Portable breathing air compressor system used in sandblasting. The air compressor must be of the type certified for human consumption or have the required safety features as required by federal standards (OSHA Standards, 1910.134).

D. Air Purifying Respirators

1. Chemical Cartridge Respirators (full face and half mask respirators)

a. A cartridge type respirator is worn generally when there is a possibility of exposure to a very light concentration of a harmful or irritating vapor. Cartridge type respirators should be limited to use in atmospheres containing at least 19.5% oxygen. Selection of the appropriate cartridge respirator (size and type of cartridge) are dependent on the chemicals and concentration to which the individual will be exposed.

A listing of the proper equipment for various chemicals is presented in Appendices (Attached).

b. Where respirators will be used on a routine basis (such as in benzene areas), respirators will be issued to individuals for his/her exclusive use. Department supervisors will insure these respirators are used and maintained in accordance with this procedure. Respirators issued to individuals for routine use will be returned to Stores at least once per year for cleaning/repair/repackaging.

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c. Where air-purifying respirators are used (cartridge), the air-purifying cartridges shall be replaced prior to the expiration of their service life or the end of the shift in which they are first used, whichever occurs first. An adequate supply of spare cartridges will be maintained in individual shops/control rooms.

2. Dust Masks

a. Dust respirators are to be used when there is exposure to dust which is irritating to the nose or throat or which may cause trouble in the bronchial tubes or lungs.

b. Only Industrial Hygiene Department approved masks obtained from Stores will be used. Only NIOSH approved masks will be considered.

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