

PLAINTIFF'S
EXHIBIT
DUP-2013



05-11A 11N/ -AM STD
(GEOLOG 2 of 2)

DUP 0502337

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DBE 1344712

DU 001982

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December 6, 1983

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FROM: R. L. McCLURE, #42 *RLM*

OCCUPATIONAL HEALTH COMMUNICATIONS GUIDELINES

Attached is an update and reissue of Plantguidelines conforming to Corporate policy on notification of employees about chemicals in their workplace.

All departments already have programs in place to accomplish this communications requirement; the attached guidelines are intended to aid supervision in conducting these programs.

Meanwhile, OSHA has recently announced that its standard regarding this subject will appear in the immediate future. Our programs will be modified as and if necessary to meet the OSHA regulation. We will transmit further guidance in this regard when the regulation is received.

RLM/bdr
Attachment
(13.10)

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EMPLOYEE OCCUPATIONAL HEALTH COMMUNICATIONS PROCEDURE GUIDANCE

1. During initial orientation, the following information will be covered with all employees new to the Beaumont Works. This information is to be of a general nature and in no way replaces the need for occupational health or safety training specific to the individual's job assignment: (Responsibility: Environmental Superintendent)

Name and locations of use of each substance which is assessed by DuPont or regulated by the government as having carcinogenic or reproductive hazard. See Exhibits "A" and "B" and Supplementary Information.

2. The above information is to be covered annually with all affected employees. (Responsibility: Line supervision)
 - a. "Affected employees" means those individuals designated by each department head as employees whose job assignment, in the judgement of their supervision, involves significant potential for exposure to a given substance.
3. Initially inform and review at least annually with all affected employees the hazards of chemicals handled in area of assignment. (Responsibility: Line supervision)
 - a. "Initially" means to be completed as part of the orientation program in the work area for all new, transferred, or reassigned employees.
 - b. "Annually" means within one calendar year of the previous review.
 - c. "Chemicals handled in the area of assignment" means those chemicals for which a Material Safety Data Sheet has been issued and which are or are likely to be present in the affected employee's workplace. When chemicals new to the area are introduced, the review is to be conducted prior to their use in the area.
 - d. Minimum content of reviews:
 - (1) Names and synonyms of chemicals involved.
 - (2) Applicable work procedures, plant and government standards.
 - (3) Potential health effects from exposure.
 - (4) Protective control measures used.
 - (5) employee responsibility for adherence to rules, practices and procedures.
 - (6) Exposure monitoring programs.
 - (7) Emergency procedures.
 - (8) New test or study results, if appropriate.
4. At the time of each employee's periodic physical examination, the relevance of medical examinations to occupational health considerations will be covered, based on knowledge of the employee's job and area of assignment. (Responsibility: Plant Medical)
5. All reviews except item No. 4 are to be documented using the attached Exhibit "C". Records are to be retained by the respective areas or departments.

The information covered in item No. 4 will be documented in the employee's medical records by Plant Medical.

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EMPLOYEE OCCUPATIONAL HEALTH COMMUNICATIONS
BEAUMONT WORKS SUBSTANCES ASSESSED BY DUPONT
OR REGULATED BY GOVERNMENT AS HAVING CARCINOGENIC PROPERTIES

SUBSTANCE	HOW USED	LOCATIONS OF USE
Acrylonitrile (ACRN)	Manufactured in the ACRN area; shipped via rail car and marine transport vessels. Routine laboratory quality control analysis.	ACRN Manufacturing Area, Dock, Transmission Piping, PD Laboratory
Asbestos	Formerly but no longer used as a major component of insulation; corrugated building sidings and roofing. Miscellaneous other current applications, such as gaskets and packing materials, some piping.	Present throughout most of the older areas of the plant; several applications of limited use as a component of other materials.
Benzene	Used as an ingredient in the manufacture of aniline; routine laboratory analyses.	Dock, received in barges, stored in tanks near dock, pumped via pipelines to Aniline Manufacturing Area where it is present throughout the unit. Quality control laboratory.
Butadiene	Used as an ingredient in the manufacture of "Nordel" raw material for Monomer "C".	Dock road storage tanks, Monomer "C" area in "Nordel".
Carbon Tetrachloride (CCl ₄)	Used as an ingredient in the manufacture of "Hypalon" synthetic rubber; routine laboratory analyses; process experimental work.	Received in rail cars; present throughout the "Hypalon" Manufacturing Area. Present in quality control lab, research lab, "Hypalon" semiworks.
Chloroform (CHCl ₃)	Used as an ingredient in the manufacture of "Hypalon" synthetic rubber; routine laboratory analyses; process experimental work.	Received in rail cars; present throughout the "Hypalon" manufacturing Area. Present in quality control lab, research lab, "Hypalon" semiworks.
Hydrazine	Used as a water treatment chemical--added to water fed to high pressure steam boilers.	Received in metal drums; present in the Methanol and Ammonia Manufacturing Areas in water treatment operations.
Ethylene Dibromide (EDB)	Used as an ingredient in lead alkyl motor fuel antiknock compound blending.	Received in rail cars; present in TEL Area.
Perchloroethylene (Perclene)	Used as a seal fluid.	Received and stored in drums (limited applications in "Hypalon" Area).

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EMPLOYEE OCCUPATIONAL HEALTH COMMUNICATIONS

BEAUMONT WORKS SUBSTANCES ASSESSED BY DU PONT AS EMBRYOTOXINS REQUIRING SPECIAL CONTROLS OR REGULATED BY GOVERNMENT AS REPRODUCTIVE HAZARD

SUBSTANCE	HOW AND WHERE USED
Lead and its Compounds	Metallic lead is used in limited applications as a material of construction in Aniline Manufacturing Area and in small quantities in the quality control laboratory. Tetraethyllead and tetramethyllead are received by marine and rail transport vessels, unloaded and blended into motor fuel antiknock compounds in the TEL Area, and shipped from the plant via marine transport, rail and motor vehicles. Lead is also routinely used in some solders in various applications throughout the plant.
Lithium Compounds	Currently, lithium compounds are present in certain greases used on the plant in numerous applications and in the quality control laboratory. Lithium bromide solution will be used in a future refrigeration system to be installed in the Acrylonitrile Area.
Ethylene Dibromide (EDB)	Received in railroad tank cars, used in TEL Area as an ingredient in lead alkyl antiknock compounds. (OSHA has proposed to regulate EDB as a carcinogen and as a reproductive hazard; proposal under review.)

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DU PONT BEAUMONT WORKS
OCCUPATIONAL HEALTH INFORMATION REVIEW

(To be retained by reporting Area)

DATE REVIEW CONDUCTED: _____ AREA OR DIVISION: _____

DATE THIS REPORT: _____ REPORT PREPARED BY: _____

CHECK APPROPRIATE BLOCK: Initial Review <> Periodic Review <>

1. List the names of all attendees.

2. List the names of substances reviewed:

3. List the subjects covered in the review for each of the substances listed in No. 2 above. As a minimum, the review must include the following listed information. (Consult area supervision or Environmental Health for specific requirements of applicable OSHA health standards):

- A. Names and synonyms of chemicals involved, locations of use.
- B. Applicable work procedures, plant and government standards.
- C. Potential health effects from exposure.
- D. Protective control measures used.
- E. Employee responsibility for adherence to rules, practices and procedures.
- F. Exposure monitoring programs.
- G. Emergency procedures.
- H. New test or study results, if appropriate.

4. List name of person conducting the review.

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SUPPLEMENTARY INFORMATION
EMPLOYEE OCCUPATIONAL HEALTH COMMUNICATIONS

The following information is available for background information and guidance in conducting occupational health reviews required by Corporate guidelines. This information will be updated as and if changes are made, and copies may be reviewed by contacting Plant Environmental Control (extension 9295).

1. R. E. Heckert to Heads of Departments, letter dated December 11, 1978, "Guidelines - Potential Health Hazards."
2. R. E. Heckert to Heads of Departments, letter dated December 12, 1978, "Guidelines - Embryotoxic Effects of Chemical Substances Made or Used by DuPont."
3. R. E. Heckert to Heads of Departments, letter dated December 21, 1978, "Guidelines - Notifying Employees About Chemicals in Their Workplace."
4. DuPont Safety and Fire Protection Division Guidelines, "Employee Occupational Health Communications," Section 9.3, 6/82.
5. Environmental Quality Corporate Policies and Guidelines, I-C, 6/83.

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