PLAINTIFF'S EXHIBIT
CEL-89

Interoffice Memorandum

TO (Name and Location)
*As Listed

DATE
May 3, 1978

FROM (Name and Location)
C. D. Barrett - Corpus Christi, R. E. Green - Clear Lake

REFERENCE NO.
CDB-70-78
REG-30-78

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Bay City	Bishop	Pampa	Clear Lake
G. B. Durett	T. L. Arnold	S. P. Keathley	J. S. Crump
C. W. Whaley	J. A. Blackshear	M. R. Stenzel	J. W. Dunn
D. G. Bremer	J. M. Jackson	H. A. Thomas	J. R. Laird
C. J. Schaefer	M. P. Neff	H. N. O'Neal	D. C. Blackwood
E. D. Luke	G. D. Boyd	P. A. Turek	D. L. Collison
D. H. Miller	D. G. Whitcomb		
	C. W. Harrison		

CCCTC	NYO	Bayport	Charlotte
W. S. Roussel	J. M. Ramey	J. E. Sanborn	A. G. Holton
E. S. Ramey	L. R. Birkner		
J. P. Hawthorne			
R. F. Stubbeman			

Subject: Industrial Hygiene Review for Purchased Chemicals

As previously stated, the Chemical Company Staff recently approved a new program entitled "Hazard Review for Purchased Chemicals" (attached). We have discussed this new program with many of you in recent months in an attempt to determine the manpower requirements for implementing the review procedures. We feel that we can implement the program without any headcount increases. After inputing all existing chemicals into the computerized file, we have estimated manpower requirements for maintaining the program as follows:

1. Clear Lake, Pampa, Bay City, and the Technical Center

   . 3 hours/week - Plant Industrial Hygienist
   . 1 hour/week - Purchasing Supervisor

2. Bishop (Chemical and Plastics)

   . 1 day/week - Facility Industrial Hygienist
   . 3 hours/week - Purchasing Supervisor

The initial input of existing chemicals into the file requires the following action:

Step 1 - Each location must develop a complete inventory list to include all raw materials, and "support" chemicals (i.e., refer to attached procedure) presently in use. Each entry should include the complete chemical or product name, the name of the supplier(s) and whether or not a material safety data sheet (MSDA) is presently on file covering the material. This initial list along with a copy of each complete MSDS should be submitted to Mr. E. Green. (Mr. Green is the newly appointed Chemical Company Analytical Industrial Hygienist. He will be responsible for assisting each of you and for coordinating the overall review program.) Mr. Green will review each of the lists for duplications between locations. Duplicate chemicals

requiring a material safety data sheet will be assigned to one using location. This will prevent several locations from contacting the same supplier for a MSDS on the same chemical or hazardous material. Mr. Green will then submit the modified list back to each location.

Step 2 - Each location should obtain a complete MSDS from the supplier for each entry on the list requiring an MSDS. (Mr. Frank Girolamo will continue to obtain MSDS's on chemicals purchased by Houston S & D.)

Step 3 - The final inventory list along with newly received MSDS's should be submitted to E. Green. Mr. Green wil distribute the MSDS's and compile a Company master list. The above three steps should be completed by July 1, 1978. Using the master list as an "approved" chemical list, each location can begin the review procedures for newly purchased chemicals on July 1, 1978. Hopefully, the Charlotte developed computer file will be available for computerizing the data bank by late 1978.

If you have questions, don't hesitate to call either one of us.

Dave Barrett

C. D. Barrett, Company Industrial Hygienist

Elsie Green by CDB

R. E. Green, Company Industrial Hygienist

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CELANESE CHEMICAL COMPANY
HAZARD REVIEW OF ALL PURCHASED CHEMICALS*

The operation of Celanese Chemical Company encompasses a broad range of production processes and chemical substances which present potential hazards to employee safety and health and the environment. It is the policy of the Company to minimize these risks by establishing and enforcing rigid standards in the field of safety and occupational health. A key element of these standards requires that certain basic information be developed on a chemical before it is purchased for use in order to identify and evaluate potential hazards and to establish approved procedures for the safe handling, use and disposal of the chemical.

A program called Hazard Review for Purchased Chemicals will be implemented immediately under the direction of the Manager, Industrial Hygiene and Toxicology. The administration of the program is detailed in the attached Administrative Procedures. The control for the program must be the shared responsibility of the Purchasing organization and the Industrial Hygiene group with consultation from the Medical and Safety Departments. The following basic policies are established:

1. For the purpose of control, all chemical substances must be considered potentially hazardous until they are evaluated and determined to be otherwise.

2. No chemical substance** will be approved for purchase until its physical, chemical and toxicological properties have been reviewed and a guideline developed for its safe use. No chemical will be introduced into the plants unless it can be handled, used, and disposed of without undue risk to employee safety, health, or the environment.

3. A chemical which has demonstrated a carcinogenic, mutagenic, or teratogenic response in humans will not be approved for purchase if there is any technically feasible substitute. The chemical may be purchased only with written approval of the Chairman, Product Safety Committee and the Corporate Medical Director.

*These approved procedures are still under review by the Company Industrial Hygienists. Minor changes can be anticipated before actual computerization.

**Chemicals purchased in small quantities for research and laboratory use will be excluded from the control procedures. A facility manager or his designee can grant temporary approval of a chemical or material in an emergency to avoid a critical process outage. Written notification of such exceptions must be sent to the Plant Industrial Hygienist within 5 days. The approving authority in the two exceptions listed above is responsible for developing enough information on the material to ensure its safe use.

4. A chemical which has demonstrated a carcinogenic, mutagenic or teratogenic response in animals and is thus a suspect human carcinogen, mutagen, or teratogen will require approval of the Manager, Industrial Hygiene and Toxicology prior to purchase.

5. No Purchase Order for a bulk chemical (i.e., raw material or catalyst) will be approved unless it is listed in the Inventory List authorized under the Toxic Substances Control Act of 1976.

6. The chemical composition of new trade name chemicals should be defined before approval for purchase.

CELANESE CHEMICAL COMPANY
ADMINISTRATIVE PROCEDURES
HAZARD REVIEW FOR PURCHASED CHEMICALS
REVISED LISTING OF SUPPORT CHEMICALS

1. Objective - To provide a positive control of the purchase of hazardous chemicals to ensure that adequate health and safety information is developed and evaluated prior to use.

2. Purpose - To identify and evaluate potential hazards associated with use of a chemical and establish approved procedures for its safe handling, use and disposal.

3. Scope - For the purpose of control, all chemical substances must be considered to be potentially hazardous until they have been evaluated and determined to be otherwise. Chemicals to be evaluated prior to purchase should include raw materials, catalysts, and support chemicals*. Support chemicals include maintenance, construction, and other related compounds such as:

a) Solid "asbestos containing" materials such as transite, building panels (such as Galbestos), etc.;

b) Liquid materials such as asphalt emulsions, plastic waterproofing compounds, polyurethanes, plastics, resin-type compounds (such as epoxy resins), pipe coatings, adhesives, sealants, joints compounds, caulking compound, rust proofing compounds;

c) Powdered or granular compounds such as abrasives, cements, etc.;

d) Welding rods, welding flux, soldering flux, etc.;

*These support chemicals can be classified according to the Company "commodity classification index". Commodity classes that might contain these chemical materials include:

08	Building materials	46	Housekeeping materials
12	Raw materials	54	Office Equipment & supplies
18	Packaging	55	Packing & gaskets
22	Electrical	58	Plastic & fiber
27	Filters	78	Security
28	Fuels	79	Outside services
		98	Welding equipment

e) Asbestos insulating materials;

f) Cutting oils, lubricants, vacuum pump oils;

g) Solvent based paints, varnishes, lacquers, thinners, shellacs, degreasing (or cleaning) solvents, Freons, etc.;

h) Water treatment compounds;

i) Pesticides, herbicides and fungicides;

j) Compressed gases including aerosols;

k) Acids, and other corrosive chemicals; and

l) Other supportive type chemical compounds such as copying machine (Xerox) compounds and printing chemicals.

Chemicals purchased in small quantities for research and laboratory use will be excluded from the control procedures. Also, chemicals and maintenance materials needed in an emergency or to avoid a critical process outage can be approved by the facility manager or his designee. Written documentation of such exceptions must be sent to the Plant Industrial Hygienist(within 5 days)who will develop the same safety and health information required for the routine purchase of a new chemical or material. The approving authority is charged with the responsibility of developing enough information on the material to ensure its safe use.

4. Procedures

a) To implement the Hazard Review for Purchased Chemicals, the Company Industrial Hygienist, with guidance from the Corporate Medical and Division Safety Departments, will develop an approved list of all chemical substances currently in use in the Company. A Material Safety Data Sheet (OSHA Form 20) will be developed and reviewed for each chemical to ensure that adequate safety guidelines have been developed on the chemical prior to approval. If this is not possible, the following information is required before a chemical can be included in the "approved" list.

- Composition
- Modified NFPA Code (Health, Fire, Reactivity)
- DOT Classification (for bulk chemicals only)
- Special Hazard Code (C-Carcinogen; SC-Suspected Carcinogen; SEN-Sensitizer; CHR-Chronic Hazard; SKIN-Skin Hazard)

- Storage Code (being considered)
- Disposal Code (being considered)
- TOSCA Information (for raw materials & catalysts only)
- First Aid Information
- Special Fire Fighting Procedures

b) The "control point" for the programs must be the shared responsibility of the Purchasing organization and the Industrial Hygiene group. An up-to-date list of chemicals approved for purchasing will be provided by the Company Industrial Hygienist for the Division Purchasing groups (within Supply and Distribution) and each facility Purchasing Department, Safety Supervisor, Laboratory Superintendent and Plant Industrial Hygienist. Purchase orders for chemicals on the Approved List will be honored immediately.

c) All Purchase Orders for chemicals which are not included in the Approved List will be handled as follows:

1) Central Purchasing will contact the Company Industrial Hygienist for approval.

2) Facility purchasing departments will contact the Plant Industrial Hygienist for approval.

d) The Company and Plant Industrial Hygienists will take the following action:

1) Request from supplier a completed Material Safety Data Sheet (MSDS) and other information needed to complete the Chemical Data Form. (The assistance of purchasing groups will be enlisted to facilitate and expedite this step. In cases of urgency, the data can be taken from the supplier by phone and the MSDS developed prior to receipt of the official form.)

2) Evaluate the data and consult as required with safety, medical and technical functions.

3) Complete the Chemical Data Form (Attachment A). It should be noted that completion of the form requires that the chemical composition be known for trade name chemicals.

4) Approve the chemical for purchase. Copies of all Chemical Data Forms (for new chemicals and materials) will be submitted to the Company Industrial Hygienist to be included on the Approved List. Copies of the MSDS's will be submitted to the Company Industrial Hygienist, Plant Industrial Hygienist, Facility Safety Supervisor, and the ordering department.

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ATTACHMENT A

CHEMICAL DATA FORM*

1. Chemical Name
2. Chemical File No.
3. Supplier(s)
4. Using Location(s) and Planned End Use
5. Generic Composition
6. Modified NFPA Code (Health, Fire, Reactivity)
7. Special Fire Fighting Procedures
8. Special Hazard Code (i.e., C = Carcinogen; SC = Suspected Carcinogen; SEN = Sensitizer; CHR = Chronic Hazard; SKIN = Skin Hazard)
9. First Aid Treatment
10. Storage Code, Disposal Code (under consideration)
11. TOSCA Information (required for raw materials & catalysts only)
    a. Chemical Abstracts Registry Number
    b. Candidate List Code Number
    c. Estimated Consumption in Current Calendar Year if Known

*This Form will be designed for key punching. As previously stated, the Company and Plant Industrial Hygienists will complete the form for input into the computerized data bank of "approved chemicals".