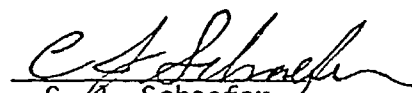


Office Memorandum

Name and Location) Karen Rozanc	DATE December 17, 1980
Name and Location) C. J. Schaefer	REFERENCE NO. CJS-229-80

**PLAINTIFF'S
EXHIBIT**tabbies
CEL-144SUBJECT: Respiratory Protection Program A.P.

Attached is the new Respiratory Protection Program A.P. It is typed on the required paper and ready for printing. I would like to get this policy out ASAP and would appreciate any extra attention/priority you could give it.


C. J. Schaefer

CJS/gh
attachment
cc: D. G. Bremer

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SAFETY

Bay City No. 32

Respiratory Protection Program

Date: 12/17/80

PURPOSE:

This Respiratory Protection Program establishes requirements for the selection, use, inspection and maintenance of respiratory equipment within the confines of the Bay City Plant of Celanese Chemical Company, Inc. The respiratory equipment shall be used for safeguarding employees against airborne contaminants and oxygen deficient work atmospheres.

This program does not apply to mine and tunnel rescue work or protection against airborne radiation.

The Bay City Plant Respiratory Protection Program incorporates provisions of the General Industry Standards, 29 CFR 1910.134 (OSHA), Respiratory Protection and ANSI Z 88.2 - 1969 of American National Standard Practices for Respiratory Protection.

PROCEDURES:

- I. Bay City Plant Management assumes the responsibility for the implementation and maintenance of the Respiratory Protection Program. Each employee has the responsibility to know and adhere to this policy.
- II. The Respiratory Protection Program shall be administered by the Respiratory Protection Program Administrator from within the Plant Safety Section.
- III. Facial hair and other facial features must not interfere with the facepiece-to-face seal of a respirator if plant activities may require that face-fit type respirators be worn during normal or abnormal conditions.
- IV. Responsibilities
 - A. Owning Supervisor
 1. Shall procure, use, inspect and maintain respiratory protection equipment in accordance with requirements of this program. The Plant Industrial Hygienist and Respiratory Protection Program Administrator shall determine the proper respirator selection.

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2. Shall ensure that inspection records are sent to Respiratory Protection Program Administrator for retention.
3. Shall ensure that a sufficient supply of approved respiratory protection equipment, for contaminants likely to be encountered in everyday work practices or in emergency situations, is provided and readily available.
4. Shall ensure that respirators are worn by the employees when required.
5. Shall ensure that each employee who may be required to wear a respirator receive appropriate respirator training provided by the Bay City Plant Safety Section.

B. Employee

1. Each employee shall use, inspect, clean, and maintain his/her respiratory protective equipment as instructed by his/her supervisor.

C. Purchasing Section

1. Shall purchase only respirators that bear the approval of the National Institute for Occupational Safety and Health (NIOSH) and approved by the Plant Industrial Hygienist and the Respiratory Protection Program Administrator.
2. Shall require vendors that supply breathing-air cylinders and breathing-air compressors to the Bay City Plant comply with specifications for Grade "D" breathing-air as described in the Compressed Gas Association's, Commodity Specification for Air, Pamphlet G-7.1, ANSI Z 86.1 - 1973.

D. Safety Section

1. Shall screen employees and prospective employees who must wear respirators for physical impairments or complications which may cause difficulty in performing job functions safely. Refer to Health Monitoring Program.

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2. Shall provide initial and recurring training courses in Respiratory Protection for all employees that may be required to wear respirators.
3. Shall be responsible for administration of Respiratory Protection Program.

E. Plant Industrial Hygienist

1. The Plant Industrial Hygienist shall periodically monitor employee exposure to airborne contaminants. Monitoring shall also be conducted following new unit start-ups or process modifications which could result in new hazards.
2. The Plant Industrial Hygienist shall be consulted for assistance in selecting appropriate respiratory protection equipment.
3. Any changes to the Respiratory Protection Program (i.e., Administrative Procedure and S.O.P.) shall be approved by the Plant Industrial Hygienist.

V. A Maintenance Program shall be contracted to perform

- A. Cleaning and Disinfecting of respirators in wash water with temperature of 120°-140°
- B. Drying
- C. Inspection and Repair after laundering with NIOSH approved repair parts
- D. Leak checked
- E. Individually bagged

VI. Ambient Hazards (Defined)

- A. Excessive contaminants, including gases, vapors, dusts, fumes, and mists

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B. Oxygen deficient work atmosphere

C. Combination of excessive contaminants and oxygen deficiency

VII. Control Measures

The primary objective shall be to control Ambient Hazards by accepted engineering controls such as confinement of the operation and local exhaust ventilation. Alternate controls may include administrative changes or the substitution of less toxic materials or approved respiratory protection. Respiratory protection shall not be used as a substitute if engineering or administrative controls are feasible and practical, except as an interim measure.

RESPIRATORY PROTECTION PROGRAM:

The following requirements are necessary considerations in a Respiratory Protection Program. Standard Operating Procedures (S.O.P.) will be based upon the following data:

I. Selection and Procurement

A. Selection shall be based upon

1. Oxygen deficient work atmosphere
2. Ambient concentration, toxicity, reactivity and irritancy of contaminants
3. Work requirements and conditions
4. Characteristics and limitations of approved respirators
5. Wearer comfort and acceptance

B. Respirator shall be NIOSH approved.

C. The Plant Industrial Hygienist shall determine type of respirator to be used based upon contaminant and exposure potential based on contaminant monitoring data.

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II. Training and Education in Proper Use of Respirators

- A. Instruction in the nature of the hazard
- B. Explanation of why other control strategies are not feasible or practical
- C. A discussion of the reasons for selecting this respirator for this particular use
- D. A discussion of the respirators capabilities and limitations
- E. Instruction and training in actual use of the respirator
- F. Classroom and field training to recognize and cope with emergency situations
- G. Special training for special use

III. Inspection

- A. Employees assigned personal respirators shall inspect them before and after each use as instructed during training session.
- B. Common use respirators shall be inspected before use and shall be cleaned after each use by the individual that has worn the respirator.
- C. Random inspections of personal, common use, and emergency respirators will be conducted by the Safety Section and the Plant Industrial Hygienist.
- D. The Owning Units will make weekly inspections on emergency, personal, and common use respirators. Records shall be forwarded by the Owning Unit Supervisor to the Safety Section for retention.
- E. Routine maintenance of personal respirators such as replacement of cartridges or filters shall be performed by the owning individual. A supply of all necessary items will be kept in stock in the Warehouse.

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IV. Maintenance

- A. Emergency respirators shall be rotated through a repair and cleaning shop on a regular basis.
- B. Assigned or personal respirators will be sent to a maintenance and cleaning shop on a regular basis.
- C. All repairs will be performed by an authorized individual or repair shop.
- D. All repairs must be made with NIOSH approved parts.

V. Fit Testing

- A. An employee must take and pass a qualitative leak test performed with the appropriate respirator(s) using irritant smoke or iso-amyl acetate while simulating body movements associated with normal work activities. The employee should be issued an identical make and model of the respirator that he/she used to pass the qualitative leak test.
- B. Employees required to wear face-fit type respirators will not have facial hair that would prevent the proper facepiece-to-face seal of a respirator.
- C. Employees who are required to wear respirators shall perform a positive or negative pressure leak test before entering a contaminated atmosphere.
- D. Eye glasses shall not be worn under full-face respirators except where they have been properly installed in approved adapters and do not interfere with face-to-respirator seal. Employees who need corrective lens should not wear full-face respirators without these adapters and glasses, except during emergencies.
- E. Contact lens shall not be worn inside the plant except for rare instances where for medical reasons an employee cannot function with regular glasses. Permission must be obtained from the Safety Section and certain conditions must be met by employee.

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VI. Storage

- A. Reusable personal respirators shall be stored in sealed plastic bags and protective containers after being properly cleaned and maintained.
- B. Respirators shall not be stored in areas of extreme temperatures.
- C. Respirators should not be stored in areas where chemicals might damage or contaminate them.

VII. Routine Application

- A. Where respirators are required for routine use they should be individually assigned.
- B. The atmosphere shall be monitored before entry into confined spaces or other areas which might be subject to oxygen deficiencies or excessive concentrations of toxic contaminants.

VIII. Emergency Application

A. Emergency Work Situations

- 1. Employees must wear an air-line respirator with auxiliary air tanks, or a self-contained unit, and must be equipped with safety harness and lines, where an oxygen deficient work atmosphere exists.
- 2. An attendant shall be present and located such that he/she is not likely to be overcome by an event affecting the wearer. The attendant shall have the necessary equipment for an emergency rescue.
- 3. Communications shall be maintained between all parties present.

- B. Immediately Dangerous Atmospheres (normally work is not performed in IDLH atmospheres; however, emergency situations arise where such entry may be required.)

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1. A self-contained respirator or an air-line unit with auxiliary tank must be worn where an atmosphere immediately dangerous to life and health (IDLH) may be expected.
2. Persons wearing air-line respirators with auxiliary tank must be equipped with safety harness and lines in atmospheres immediately dangerous to life or health (IDLH).
3. There shall be at least two standby persons stationed outside the toxic atmosphere. They shall remain in communication with those in the toxic atmosphere. At least one shall have the necessary self-contained breathing apparatus and equipment on hand for emergency rescue.

IX. Emergency Respirators

- A. Adequate respiratory protection will be kept easily accessible to facilitate the safe escape of all employees from areas in which immediately dangerous to life and health (IDLH) atmospheric contamination may occur.
- B. Emergency escape respirators will be of a type which is easily put on, such as an escape unit with a plastic hood. These will be kept in the immediate vicinity of work stations subject to dangerous toxic contamination.
- C. Respirators used for emergency re-entry will be self-contained breathing apparatus (SCBA) units required for immediately dangerous to life or health (IDLH) atmospheres. The IDLH units will be kept immediately outside areas likely to be quickly contaminated. Additional units may be kept at a central location or on emergency vehicles.
- D. Considerations will be given during emergency planning to assure that a fully adequate supply of breathing-air tanks is available, and that adequate refilling capacity exists on plant site.

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