PLAINTIFF'S EXHIBIT
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CEL-344

CELANESE CHEMICAL COMPANY
Chemcel Plant
Bishop, Texas

To: W. H. Meyer

From: J. M. Jackson JMJ-17-77 October 6, 1977

OSHA Monitoring Requirements

The Occupational Safety and Health Administration (OSHA) monitoring program for Bishop has increased significantly in 1977. This increase has reduced the effectiveness of our program with current monitoring manpower. Listed in Table I are major areas in the current OSHA program that require immediate attention.

Items I and II of Table I were added to the OSHA priority list the second and third quarters of this year, and have greatly expanded monitoring requirements. The following is a brief explanation of why the formaldehyde and benzene surveys should be given high priorities:

Formaldehyde Exposure Survey

The National Institute for Occupational Safety and Health (NIOSH) has recommended to OSHA that a formaldehyde standard be set at one (1) ppm. It is the opinion of the Celanese Chemical Company Manager of Product Standards, Mr. J. M. Ramey, that, within 12-18 months, OSHA will act on this recommendation. The SOCMA Formaldehyde Task Force, chaired by Mr. Ramey, is formally questioning the proposed 1ppm standard. They will attempt to prove a 1ppm standard unrealistic and having serious economic impact on formaldehyde producers. In support of SOCMA, most major formaldehyde producers are currently obtaining extensive formaldehyde monitoring data. A complete and documented formaldehyde survey of the extent required by SOCMA is not available at the Bishop Plant. Mr. Ramey has requested that Bishop participate in the SOCMA program as described in Item I, Table I.

Additional formaldehyde data is also needed to assure continued protection of our employees health, the prime objective of our program.

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Benzene Exposure Survey

An Emergency Temporary Standard (ETS) for occupational exposure to benzene was issued effective May 21, 1977. A permanent standard was to follow within six months of the ETS. Meanwhile, court action withdrew implementation of the ETS, and it is very doubtful it will be re-implemented. However, the permanent benzene standard is scheduled to be issued about November, 1977, unless acted on by the courts. Because of the ETS, an initial benzene exposure survey was made, and the results reported in JMJ-11-77. However, the data in this survey is not complete enough to implement a medical surveillance program which would be required in the expected Permanent Benzene Standard. Because issuance of a Permanent Benzene Standard is expected, Program II, Table I is considered high priority by Mr. J. M. Ramey and Mr. C. D. Barrett (Celanese Industrial Hygienist).

Phase I, II and III OSHA Monitoring

Item III, Table I was established to obtain minimum exposure data for all Bishop Plant airborne contaminants. Details of this program are described in AER-37-76. This program is considered high priority and is carried in the 1977 Laboratory objectives. Sampling and analytical data were completed on Phase I and II, July 20, 1977, for the Chemical Company (Bishop). Plastics Company monitoring (Phase I and II) has not been completed due to interfering priorities (i.e. benzene survey, special requests, etc.).

Items V through VIII of Table I are self-explanatory, and are all an essential part of the ongoing Bishop OSHA monitoring program.

To progress in all necessary areas of OSHA monitoring, it is becoming increasingly obvious that additional manpower is required. Table II outlines the estimated completion time for the Bishop formaldehyde, benzene and Phase I, II and III surveys with current manpower (one chemist), and with one chemist plus a technician. Included in the formaldehyde estimation is a CEA 555 Continuous Formaldehyde Monitor described in JMJ-16-77, which is currently being tested by CCCTC. If successful, we have recommended purchase (JMJ-16-77).

The estimated times in Table II represent fully dedicated manpower per survey (e.g. If all the OSHA Chemist's time plus a technician's time were dedicated, it could be completed in 410 days; if all of the OSHA Chemist's time plus a technician's time were dedicated, it could be completed in 157 days).

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Table III outlines the estimated time required for all additional phases of the OSHA monitoring program. As can be seen in the Table, these items alone currently require almost a full-time chemist.

J. M. Jackson

JMJ/jm
Attachments

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Table I

Current Bishop OSHA Monitoring Program

I. Formaldehyde Exposure Survey
   1. Survey all Plant job descriptions.
   2. Determine which jobs have probable formaldehyde exposure.
   3. Define, by sampling, the exposure level of all jobs in No. 2.

II. Benzene Exposure Survey
   1. Survey all Plant job descriptions.
   2. Determine which jobs have probable benzene exposure.
   3. Define, by sampling, the exposure level of all jobs in No. 2.

III. Special Request
   1. Special exposure monitoring under unusual conditions to ensure safety and health of employees (e.g. $Ni(CO)_4$, CO, etc.).
   2. Request from outside sources (e.g. Industrial Hygienist, Chemical and/or Corporate, etc.).

IV. Phase I, II and III Monitoring
   1. Determine the "worst case" exposure level of all significant air-borne contaminants in the Plant work areas.
   2. Determine exposure levels at the Corpus Christi Terminal.

V. Routine Asbestos Monitoring according to Federal Register 1910.93a.

VI. Follow-up Monitoring
   1. Follow-up on all exposures in excess of action or proposed action level.
   2. Follow-up to determine the effectiveness of Administrative and Engineering changes.

VII. Method Development
   1. Develop monitoring and analytical methods when none are available.
   2. Modify existing methods to make them compatible with Bishop Plant problems.

VIII. Documentation of monitoring data and analytical methods

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Table II

Estimated Time to Complete the
Formaldehyde, Benzene and Phase I, II and III Monitoring Program

	Manpower	Sample Time in Days			Analytical Time, Days	Total Time Days
		Personnel 8-hr. TWA	Area 8-hr. TWA	Short-Term Ceiling		
Formaldehyde Survey	One Technical	110	41	59	200	410
	One Technical plus Continuous Analyzer	110	41	59	Can Be Completed Same Day as Sampled	210
	One Technical plus One Technician	60	22	15	60	157
	One Technical plus One Technician plus Continuous Analyzer	55	25	33	Can Be Completed Same Day as Sampled	113
Benzene Survey	One Technical	45	10	20	20	95
	One Technical plus One Technician	24	5	5	10	44
Phase I, II and III	One Technical	45	45	45	40	244
	One Technical plus One Technician	20	20	20	10	70

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Table III

Time Required for Continuing OSHA Monitoring Program

Program	Approximate Time Required(1)
Routine Asbestos Sampling	2 weeks/year
Follow-up Monitoring	1 week /month
Method Development	1 week /month
Documentation	4 days /month
Special Request	2-4 days /month

(1) These time estimates may vary significantly, depending upon results of initial surveys.

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0405	CONDUIT2IN RIGIDSTEEL		19991	0	51069	20	11
0127	BLOCKS FOAMGLASS 6X18X2	SQ	19991	0	51069	216	108
8420	HI MASTIC 90 07	GAL	19991	0	51069	5	23
0062	INSULATION 1X48X100	ROL	19991	0	51069	3	95
7105	JACKETIN 020X36X10		19991	0	51069	2	70
6020	CEMENT H LOSET	CLB	19991	0	51069	2	20
0452	GASK 581Z4X571Z4X3Z32 S		19991	0	51069	2	47
0130	ELECTRODES 5Z32IN FW5		19991	0	51069	100	393

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SHIP TO: SAME
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YOUR ORDER NO.	SALESMAN	TAKEN BY	ORDERED BY	PAYMENT TERMS:
330-7000-8	STEPHENS	W. C.		NET 30 DAYS

QUAN	DESCRIPTION	PRICE	AMOUNT
20	7 x 1/8 x VA #1 BLUE DRY SAFETY REINFORCED BLADES	2.55	51.00
	3% TAX		1.53
	TOTAL		52.53
	THANK YOU		

ACCOUNTS PAYABLE JUL 11 1968 DISPATCHED

RECEIVED JUL 12 1968 Accounts Payable

JUL 11 1968

ORIGINAL

P. O. No. 7000-8
M. R. No.
☐ Ppd. ☐ Divd.
☐ Our Pickup
Coll. Amt.
Terms N
F. O. B. B
Inv. Checked
P. O. Checked
M. R. Checked
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330-7004-8	STEPHENS	ALAMO EXPRESS	JIM PARKS	NET 30 DAYS

QUAN.	DESCRIPTION	PRICE	AMOUNT
3,500	POUNDS (35 - 100# CARTONS) H.W. SUPER PLASTIC	6.70 /cwt	234.50
	3% TAX		7.04
	TOTAL		241.54

THANK YOU

JUL 10 1968

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P. O. No. 7004-8
M. R. No. 4
☐ Ppd. ☐ Dlvd.
☐ Our Pickup
Coll. Amt. 23.10
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Inv. Checked
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