



SAFETY PROGRAMS & PROCEDURES

SOUTHWESTERN REFINING CO.



TITLE: HAZARD COMMUNICATION PROGRAM

#12

PLAINTIFF'S
EXHIBIT
KRC-219

Revised:
DATE 6/16/86

PAGE 1 OF 3

Purpose

It is the intent of Kerr-McGee Refining Corporation that employees be informed about potentially hazardous substances found in the workplace. Through proper training, labeling, and the use of appropriate protective measures, these substances can be worked with safely.

Hazard Determination

A list of potentially hazardous substances has been completed and will be updated as appropriate by the Hazard Communication Coordinator. All substances have been evaluated to determine potential hazards. New substances will be evaluated. Evaluation of purchased substances is based on MSDS's from the manufacturer. Evaluation of our products include literature review and criteria established by the OSHA Hazard Communication Standard, 29CFR 1910.1200. Both health and physical hazards have been evaluated. The evaluation was completed by the Hazard Communication Coordinator and other facility personnel, the KMRC Manager, Product Safety and Compliance, and Corporate Medical Services and Safety personnel.

A completed "Chemical Hazard Communication List" will be located in each control room. Among other things, the list will reflect the substance name, hazard warning, and protective clothing and equipment required.

Labels

Manufacturers, importers, and distributors are required to label containers of hazardous products. These labels are required to identify the hazardous substance and designate the appropriate warning. These labels are obviously very important to individuals working with these purchased materials; the labels must remain on the container.

The warehouse personnel will check incoming containers for labels. Unlabeled containers will not be released into the facility until the situation has been reviewed with the Hazard Communication Coordinator and, if warranted, the container has been labeled. Any individual who notices a label is no longer on a container will notify the Hazard Communication Coordinator.

Process and storage containers within the facility will be labeled to identify the hazardous substance and appropriate warning. Labeling will consist of a combination of methods:

1. NFPA Hazard Ratings.
2. Vessel identification number.
3. Name of material for dedicated vessels.
4. Color coded flow sheets in control rooms for pipes.
5. Signs at sample points with a master sheet in the control room.
6. MSDS Book in control rooms.
7. Chemical Hazard Communication List in control rooms.

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Material Safety Data Sheets: MSDS

An MSDS has been obtained for the various substances we purchase. Also, an MSDS has been developed by us for our products. An MSDS Book will be located in each control room. The Industrial Hygienist will be responsible in keeping the MSDS books current. The Hazard Communication Coordinator is to be contacted with regard to any question about an MSDS.

An MSDS contains data which describes the material and potential hazards. The exact format may vary, but an MSDS from any company is required to have the following information:

1. Chemical identification.
2. Hazardous ingredients.
3. The OSHA Permissible Exposure Limit (PEL) and the American Conference of Governmental Industrial Hygienist Threshold Limit Value (ACGIH-TLV)
4. Physical and chemical characteristics, such as appearance and vapor pressure.
5. Physical hazard characteristics, such as flash point.
6. Health hazards, including routes of entry and symptoms of exposure.
7. Emergency and first aid procedures.
8. Whether the chemical is considered a potential carcinogen or a carcinogen based on information from the International Agency for Research on Cancer (IARC), National Toxicology Program (NTP), or OSHA.
9. Safe handling procedures and personal protective equipment.
10. Procedures for spill clean-up.
11. Date of preparation.
12. Name, address, and telephone number of the manufacturer.

Training

1. The Routine safety meetings.
2. Operational procedures.
3. Personal protective equipment.
4. Fire prevention and firefighting.
5. Corporate industrial hygiene and safety programs.
6. Employee Safety Handbook.

These existing programs will be expanded, and new training programs will be developed to assure employees remain informed as to the following:

1. Identification of potentially hazardous substances.
 - a. Southwestern maintains an Annual Industrial Hygiene monitoring program.
2. Specific hazards.
3. Means of identification and protection.
4. Location of information.
5. Components of labeling system.

1H 053976



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Training: cont.

Actual training will be conducted by Supervisors with assistance of safety and health personnel. Training material will consist of written material, employee handouts, movies, and other visual aids.

The key components of the Hazard Communication Program will be located in each control room:

1. Written Hazard Communication Standard.
2. Chemical Hazard Communication List.
3. MSDS Book.
4. OSHA Hazard Communication Standard.

Non-routine Operations

These tasks involve procedures such as hot work and vessel entry, catalyst regeneration or replacement and unit start-up or shutdown. Written procedures have been developed for non-routine operations. Supervisors will conduct training prior to non-routine operations.

Contractors

The contractor supervisor will be given a copy of "Safety Handbook." The supervisor will also receive training about our Hazard Communication Program, including the labeling system and the location of the appropriate training materials. The contractor supervisor will be responsible for training his employees.

Auditing

The Hazard Communication Program will be audited at least once a year by one or more of the following:

1. KMRC Manager, Product Safety & Compliance.
2. Corporate Industrial Hygiene.
3. Corporate Regulatory Affairs.

Any questions or recommendations by any employee with regard to any part of the Hazard Communication Program should be directed to the Hazard Communication Coordinator, V. W. Litton.

APPROVED:

V. W. Litton
V. Waylon Litton, Manager of Safety/Hygiene

Tom W. Sands
Tom W. Sands, Vice President & General Manager

1H 053977

SOUTHWESTERN REFINING NEW EMPLOYEE ORIENTATION/TRAINING

EMPLOYEE _____

CONTRACT _____

DATE _____

HOURS NEEDED _____

TRAINING PROGRAMS

N	C	S		N	C	S	
[]	[]	[]	PIANT SAFETY HANDBOOK	[]	[]	[]	H2S AWARENESS
[]	[]	[]	PLANT TOUR	[]	[]	[]	SCOTT AIR PACK
[]	[]	[]	TERMTNAI TOUR	[]	[]	[]	HazWOPER AWARENFESS
[]	[]	[]	RESPIRATORY & FIT TEST.	[]	[]	[]	BENZENE AWARENESS
[]	[]	[]	EYE SAFETY	[]	[]	[]	FIRE EXTINGUISHER
[]	[]	[]	"NATURE OF PETROLIUM"	[]	[]	[]	CONTRACTOR SAFETY
[]	[]	[]	DEFENSIVE DRIVING	[]	[]	[]	HAZARD COMM.
[]	[]	[]	EEOC REV. & TEST	[]	[]	[]	HEARING CONSERV.
[]	[]	[]	HAZARDOUS AREA TOUR	[]	[]	[]	HF ACID AWARENFESS
[]	[]	[]	CONTROL ROOM TOUR	[]	[]	[]	ASBESTOS AWARENFESS
[]	[]	[]	WASTEWATER TOUR	[]	[]	[]	SAFETY ORIENTATION
[]	[]	[]	FIREPUMP LOCATION	[]	[]	[]	SHOP AREA TOUR

NAME _____
AREA OF ASSIGNMENT _____

CLASSIFICATION _____
INSTRUCTOR _____

I HEREBY ACKNOWLEDGE MY PARTICIPATION IN THE ABOVE TRAINING COURSE(S):
SIGNATURE _____ DATE _____

COMMENTS: _____

N - NEEDED TRAINING
C - COMPLETED TRAINING
S - SCHEDULED TRAINING

TRAINING & DEVELOPMENT

MTKF BLUNDELL

1A 173246

INDUSTRIAL HYGIENE MONITORING PROGRAM
1987

7 13

1987

1B 001249

Controlled Substance	OSHA Standard	Location	Monitoring	Frequency	Pump Flowrate	Collection Medium
Asbestos	8-TWA = .2 fibers/cc	Insulation removal containing Asbestos	P-full shift	Each occurrence	1.5 LPM max. vol 240 liters	Membrane filter 0.8µ AA (MCEF) Open Face 25 MM cassette w/50 mm extension cowl
Benzene	8-TWA = 10 ppm STEL = 5 ppm	Washwater Plant OP Aft. Sep./Tank 204 Crude I & II Units BTX Unit Platformer Unit Sulfolane Unit Barges/Landfarm Main Laboratory Crude I Laboratory Sulfonene Laboratory Compressor House Knock Engine Room Vehicle Maintenance Bays Air Comp. @ Sandblast yard	P. Full Shift Area P-full shift STEL-15 min.	Annually Annually Annually	0.1-0.2 LPM max. vol 10 liters	Activated charcoal
Carbon Monoxide	8-TWA = 50 ppm STEL = 400 ppm	Crude I Laboratory Compressor House Knock Engine Room Vehicle Maintenance Bays Air Comp. @ Sandblast yard	A-Grab	As Needed	Follow manufacturer's Specifications	Detector Tube: Draeger CH25601 (5-700 ppm) Direct Reading-Ecolyzer
Hydrogen Fluoride	8-TWA = 3 ppm STEL = 6 ppm ACGIH = 3 ppm	Alkylation Unit	P-full shift STEL-15 min.	Annually	1.0 LPM max. vol 120 liters	Membrane filter 0.8µ (MCEF) with backup pad treated with alkaline fixative solution (Dissolve 25g sodium carbonate in water, add 20 ml glycerol, and dilute to 1 liter)
Hydrogen Sulfide	8-TWA = 10 ppm STEL = 15 ppm "C" = 20 ppm	Sample draw locations with potential H ₂ S Area Sample Sulfur Complex (Long Duration)	P-full shift A-Grab	Annually	0.1-0.1 LPM max. vol 2 liters	Midget Impinger with 10 ml of cadmium sulfate Detector tubes: Draeger-67-19001 (1-200 ppm) Draeger-CH-29101 (100-2000 ppm) Draeger-CH-28101 (0.2-7 vol%) Draeger-67-28141 (5-60 ppm)

<u>Controlled Substance</u>	<u>OSHA Standard</u>	<u>Location</u>	<u>Monitoring</u>	<u>Frequence</u>	<u>Pump Flowrate</u>	<u>Collection Medium</u>
Iron Oxide Fume	8-TWA = 10 mg/M ³	Welding Operations	P-full shift	Annually	2.0 LPM max. vol = 960 liters	Membrane filter 0.8 AA (MCEF)
Chromium (metals & insoluble salts)	8-TWA = 1.0mg/M ³	Welding Operations Rods - Arcaloy 310 McKay E309 310 CB16	P-full shift	Annually	2.0 LPM max. vol. = 960 liters	Membrane filter 0.8 AA (MCEF)
Nickel (metal & soluble compounds)	8-TWA = 1.0mg/M ³	Welding Operations Rods - Arcaloy 310 McKay E309, 310 CB16	P-full shift	Annually	2.0 LPM min. vol = 200 liters max. vol = 960 liters	Membrane filter 0.8 AA (MCEF)
Toluene	8-TWA = 200 ppm "C" = 300 ppm	See Benzene	P-full shift STEL-15 min.	Annually	0.1-0.2 LPM max. vol=10 liters	Activated charcoal
Xylene	8-TWA = 100 ppm	See Benzene	P-full shift	Annually	0.1-0.2 LPM max. vol = 20 liters	Activated charcoal
MTBE		Barges	P-full shift	Annually	0.1-0.2 LPM max. vol = 20 liters	Activated charcoal
Noise	8-TWA = 90 dBA Action level = 85 dBA	Throughout Facility	P-full shift (noise dosimeters) A-Grab (sound level meter A-scale slow response)	Bi-Annually (Subsequent to process or engineering change)		Noise Dosimeter sound level
Heat		Throughout Facility	A-Grab	Each occurrence		WBGT

1B 001250

<u>Controlled Substance</u>	<u>OSHA Standard</u>	<u>Location</u>	<u>Monitoring</u>	<u>Frequency</u>	<u>Pump Flowrate</u>	<u>Collection Medium</u>
Dust, Respirable Nuisance	5.0mg/M ³	Landfarm	P-full shift	Annually	1.7 LPM	Cyclone PVC filter 0.8µ
Heavy Metals*		Landfarm	" "	" "	2.0 LPM	Membrane filter 0.8µ (MCEF)

CD:ah
2/26/87

* TO BE DETERMINED USING ETC ANALYSIS DATA

1987

INDUSTRIAL HYGIENE MONITORING PROGRAM

SOUTHWESTERN REFINING COMPANY

P-PERSONNEL
A-AREA

Controlled Substance	OSHA Standard	Location	Monitoring	Frequency	Pump Flowrate	Collection Medium
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Benzene	8-TWA = 10 ppm	Crude I & II Units BTX Unit Platformer Unit Sulfolane Unit Barges/Landfarm Main Laboratory Crude I Laboratory	P-Full shift STEEL-15 min.	Annually	0.1-0.2 LPM max. vol 10 liters	Activated charcoal
Carbon Monoxide	8-TWA = 50 ppm STEEL = 400 ppm	Compressor House Knock Engine Room Vehicle Maintenance Bays Air Comp. @ Sandblast yard	A-Grab	As Needed	Follow manufacturer's specifications	Detector Tube: Draeger CH25601 (5-700 ppm) Direct Reading-Ecolyzer
Hydrogen Fluoride	8-TWA = 3 ppm STEEL = 6 ppm ACGIH ceiling 3 ppm	Alkylation Unit	P-Full shift STEEL-15 min.	Annually	1.0 LPM max. vol 120 liters	Membrane filter 0.8µ (MCEF) with backup pad treated with alkaline fixative solution (Dissolve 25g sodium carbonate in water, add 20 ml glycerol, and dilute to 1 liter)
Hydrogen Sulfide	8-TWA = 10 ppm STEEL = 15 ppm "C" = 20 ppm	Sample draw locations with potential H ₂ S Area Sample Sulfur Complex (Long Duration)	P-Full shift A-Grab	Annually	0.1-0.1 LPM max. vol 2 liters	Midget Impinger with 10 ml of cadmium sulfide Detector tubes: Draeger-67-19001 (1-200 ppm) Draeger-CH-29101 (100-2000 ppm) Draeger-CH-28101 (0.2-7 vol%) Draeger-67-28141 (5-60 ppm)

1B 001252

Controlled Substance	(SHA) Standard	Location	Monitoring	Frequency	Pump Flowrate	Collection Medium
Iron Oxide Fume	8-TWA = 10 mg/M ³	Welding Operations	P-full shift	Annually	2.0 LPM max. vol = 960 liters	Membrane filter 0.8 AA (MCEF)
Chromium (metals & insoluble salts)	8-TWA = 1.0mg/M ³	Welding Operations Rods - Arcaloy 310 McKay E309 310 CBI6	P-full shift	Annually	2.0 LPM max. vol. = 960 liters	Membrane filter 0.8 AA (MCEF)
Nickel (metal & soluble compounds)	8-TWA = 1.0mg/M ³	Welding Operations Rods - Arcaloy 310 McKay E309, 310 CBI6	P-full shift	Annually	2.0 LPM min. vol = 200 liters max. vol = 960 liters	Membrane filter 0.8 AA (MCEF)
Toluene	8-TWA = 200 ppm "C" = 300 ppm	See Benzene	P-full shift STEL-15 min.	Annually	0.1-0.2 LPM max. vol=10 liters	Activated charcoal
Xylene	8-TWA = 100 ppm	See Benzene	P-full shift	Annually	0.1-0.2 LPM max. vol= 10 liters	Activated charcoal
MTBE 1-20-87 4-23-87 A around 141 Tank		Barges	P-full shift	Annually	0.1-0.2 LPM max. vol = 20 liters	Activated charcoal
Noise 1-11-87 2-12-87	8-TWA = 90 dBA Action level = 85 dBA	Throughout Facility	P-full shift (noise dosimeters) A-Grab (sound level meter A-scale slow response)	Bi-Annually (Subsequent to process or engineering change)		Noise Dosimeter sound level
Heat 3-27-87 7-30-87 8-7-87		Throughout Facility	A-Grab	Each occurrence		WBGT

<u>Controlled Substance</u>	<u>OSHA Standard</u>	<u>Location</u>	<u>Monitoring</u>	<u>Frequency</u>	<u>Pump Flowrate</u>	<u>Collection Medium</u>
Dust, Respirable Nuisance	5.0mg/M ³ 9-4-87 8-27-87	Landfarm	P-full shift	Annually	1.7 LPM	Cyclone PVC Filter 0.8µ
Heavy Metals*	3-16-87 4-4-87 4-5-87 4-23-87 8-3-87	Landfarm	" " " "	" " " "	2.0 LPM	Membrane filter 0.8µ (MCEF)
CD: ah 2/26/87						

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SAFE WORK PROCEDURES

SOUTHWESTERN REFINING CO.



TITLE: RESPIRATORY PROTECTION PROGRAM

#95

DATE: September 1, 1989

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I. OSHA Regulations (1910.134)

A. Permitted Uses

1. When effective engineering controls are not feasible to control air contaminants such as harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors.
2. Back-up protection.
3. Emergencies.
4. While engineering controls are being installed.

B. Company Responsibilities

1. Providing suitable respiratory protective devices.
2. Assuring that employees properly use, clean, store and maintain the respiratory protective equipment. Supervisors shall conduct frequent random inspections.
3. Establishing and maintaining a Respiratory Protection Program.

C. Employee Responsibility

1. Using and maintaining the respiratory protective equipment in accordance with the established Respiratory Protection Program.
2. Non-compliance with this policy by the employee is a serious matter and may be cause for discipline and possible discharge.

II. Respiratory Protection Program

A. The following constitutes Southwestern's Program.

1. Southwestern's Safety/Industrial Hygiene Department will be responsible for the administration and selection of all respiratory protection equipment.
2. Administration:
 - a. Program Administrator - Stephanie Settles - oversees responsibility for specific phases of the Respirator program.
 - b. Program Advisor - Waylon Litton



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III. Selection of Respirators

A. Criteria

1. Degree of Hazard

a. Immediately Dangerous to Life or Health

1. These are conditions that pose an immediate threat to life or health which could result in death or permanent damage to ones health.
2. When in doubt about the amount of oxygen or hazardous material, use respiratory protective devices specified for "Immediately Dangerous to Life or Health". Err only on the safe side in emergencies.

2. Type of Hazard

- a. Oxygen Deficient Atmospheres - less than 19.5% oxygen.
- b. Oxygen Rich Atmospheres - more than 21% oxygen.
- c. Gas or vapor.
- d. Particulate - small solid or liquid particles suspended in the air, such as dust, mist, aerosol, smoke fog, fume, or spray.

B. General Guide for Selection - Respirators will be selected on the basis of hazards to which the worker is exposed. Only MSHA/NIOSH -certified respirators will be selected and used.

1. Immediately Dangerous to Life or Health or oxygen deficient atmospheres. Use only Scott Pressure Pak or Scott Air Pak. Standby equipment and personnel are also required. (See the Scott Pressure Pak and the Air Pak guideline for details.)
2. Not Immediately Dangerous to Life or Health. Use respiratory protective equipment per following chart:

Hazard:

- Toxic Gas/Vapor - Supplied Air Respirator
- Approved Air Purifying Respirator with Chemical Cartridge

Toxic Gas/Vapor and Toxic Particulate/Dust

- Combination chemical cartridge
& particulate filter



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Non Toxic Particulate/Dust - Supplied Air Respirator
- Combination chemical cartridge and particulate filter
- Particulate filter
- Disposable dust mask

Spray Painting - Supplied Air Respirator
- Combination chemical cartridge and spray paint filter

C. Other Criteria

1. Supervisors and employees are responsible to watch for changing conditions that could require a different respiratory protective device.
2. The Safety/Industrial Hygiene Department will recommend the need for and the proper type of respiratory protective equipment for each operation.

IV. Assigning

A. Employees required to wear respiratory protective devices will be assigned a unit for their exclusive use when:

1. Prescription glasses necessitates.

B. When respiratory protective devices will be maintained for emergency use.

V. Program Review

A. Observe employees to check the following:

1. Comfort
2. Ease of breathing
3. Adequacy of visibility
4. Ability to communicate
5. Ability to perform tasks without undue effort
6. Confidence in face piece fit
7. Understanding of need for the equipment



SAFE WORK PROCEDURES

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VI. Training

A. Nature of Potential Hazard

1. Make certain that employees fully understand the seriousness of following plant rules on personal protective equipment.
2. Caution employees to ask their supervisors, if they have any questions or doubts.

B. Equipment selection

1. Respirator selection is based on degree of hazard.
2. Each employee will be instructed and trained in the proper use and limitations of respirators.

C. Use and Fitting Demonstration

1. Employee must make sure:
 - a. He/She knows how to use the respirator.
 - b. He/She inspects respirator prior to and after each use for condition and cleanliness.
 - c. He/She can get a good face-to-mask seal. The following conditions often prevent a good seal:
 1. Beard.
 2. Long mustache or side burns.
 3. Absence of one or more dentures.
 4. Temple pieces on glasses.
 5. Chewing tobacco.

*Respirators should not be worn when conditions prevent a good face seal.

D. Qualitative Fit Testing

1. Have employee don respirator and make all adjustments.
2. Have employee check the facepiece fit. (Seal)



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3. When employee has indicated that he/she has a good seal:
 - a. He/She will don the canopy hood.
 - b. Next a saccharin taste threshold screening will be conducted to assure that a taste response is elicited.
 - c. Upon confirmation of the saccharin taste, the fit testing will be conducted.
 - d. The employee will be asked to turn his/her head from side-to-side, nod up-and-down and talk.
 - e. If no saccharin taste is detected then the fit testing was successfully completed.
 - f. If a saccharin taste is detected the fit is deemed unsatisfactory and a different respirator shall be tried.

E. Maintaining the Equipment

1. Employee will turn in to Safety/Industrial Hygiene Department all masks and respirators immediately after use so that clean ones may be issued.
2. The Safety/Industrial Hygiene Department will clean and store respirators in a clean and sanitary location.
3. All respirators/masks stored outside of the Safety/Industrial Hygiene office will be stored in a plastic bag away from direct sunlight, excessive moisture, and dust.

F. Inspections/Audits

1. Respirators used often will be inspected during cleaning. Worn or deteriorated parts will be replaced. Respirators for emergency use such as a self contained breathing apparatus (SCBA), will be thoroughly inspected at least once a month and/or after each use. An inspection checklist will be kept with each Scott Air Pak (SCBA) and the inspector shall date and initial each inspection.
2. Periodic audits of inspection checklists and visual inspection of Scott Air Pak condition will be conducted by the Safety/Industrial Hygiene Department.

APPROVED:

V. Waylon Litton
V. Waylon Litton, Manager of Safety/Hygiene

Tom Sands
Tom Sands, Vice President & General Manager

Next Review
Sept. 1, 1990
SWP95 8-89