

Interoffice Memorandum

TO (Name and Location) ** AS LISTED	DATE October 5, 1978
FROM (Name and Location) L.R. BIRKNER	REFERENCE NO. LRB/127/78

SUBJECT: GUIDELINE FOR RESPONSE TO CHEMICAL HAZARD ALERT/ENVIRONMENTAL HEALTH HAZARD IMPLEMENTATION PROCEDURES

PLAINTIFF'S
EXHIBIT
CEL-961

Introduction

In March of this year, the Department of Environmental and Health Affairs (DEHA) issued a guideline for the internal handling of information concerning potential environmental or health hazards resulting from toxicological, epidemiological or other studies performed within or outside Celanese. This review has occurred and shown below is how the guideline is being implemented.

Objective

When information concerning the potential adverse health or environmental effect of a chemical substance or physical agent is received by the DEHA, our objectives are:

1. To inform all operating companies that may be using the chemical or agent of the suspected hazard and how to limit further contact, where that is necessary.
2. To gather for, DEHA evaluation, basic information as to the use of the chemical or agent within the operating companies. This information will be used to determine if an actual problem exists and if further action by the operating companies is necessary to limit, eliminate and/or monitor the exposure.
3. To determine which, if any, Federal Agencies need to be contacted.

Implementation Procedure

1. Information Received by the Department

- When information is received by the DEHA concerning the adverse health/environmental effects of a chemical substance or physical agent, it will receive preliminary review. If it is felt that Celanese may be exposed to this potential hazard, the information will be summarized and distributed to the names on the DEHA Chemical Alert Distribution List. The summary will include information for abatement of the suspected exposure.

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2. Request for Information

In addition to supplying information concerning the potentially hazardous nature of the chemical or physical agent, the DEHA will request the following information:

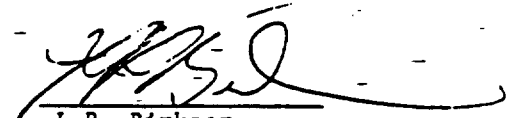
- (a) Does your operating company use the chemical or agent in question?
- (b) What quantities does the company use?
- (c) What processes is it used in?
- (d) Industrial Hygiene monitoring data, when available.

Depending on the nature of the alert, a deadline for receiving the information will be stated. Generally, this period will not exceed 30 days. Phone calls will be made to those operating companies who have not responded by the deadline.

For alerts that the DEHA determines require a rapid response, a telephone canvass will be made.

- 3. Information Evaluation - The DEHA will review the data as outlined in the Guideline to determine if and what kind of additional action may be necessary.
- 4. Additional Monitoring and Abatement of Exposure - If additional action is required, the operating companies will receive information and assistance from the DEHA to monitor and/or further abate the exposure in question. In addition, each operating company should develop procedures for informing employees and customers of the problem, based on the analysis of the hazard.

If you have any questions or comments concerning the implementation procedures, please contact me.


L.R. Birkner

LRB/to
cc***

HNA 24839