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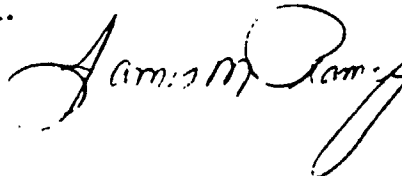
Interoffice Memorandum*C. D. Barrett*

TO (Name and Location)	DATE
DR. E.N. WHEELER	September 26, 1977
FROM (Name and Location)	REFERENCE NO.
JAMES M. RAMEY	JMR/557/77

SUBJECT: ADMINISTRATIVE PROCEDURE - HAZARD REVIEW FOR PURCHASED CHEMICALS

A proposed Administrative Procedure requiring hazard review of purchased chemicals was presented to the August 18th meeting of the Product Safety Committee. You will recall that the extensiveness of the list of support chemicals was questioned. R.D. Damron and C.D. Barrett were asked to develop a more definitive list which excludes many maintenance and construction materials that should not be covered.

I have revised the Administrative Procedure to reflect their recommendation. If this meets with your approval I suggest that Mr. Trebellas mail copies of the revised Administrative Procedure (attached) to all members of the Product Safety Committee for final approval.



JMR/to
enc.

CC: Dr. J. Trebellas
J.A. Bousquet
C.D. Barrett
R.D. Damron

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CELANESE CHEMICAL COMPANY
HAZARD REVIEW OF ALL PURCHASED CHEMICALS
PROPOSED POLICY STATEMENT

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, Product Standards. 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 product standards 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.

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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.
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, Product Standards prior to purchase.
5. No Purchase Order for a chemical 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.

* - 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 Division 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.

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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 water-proofing 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.;
- 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.

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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 Division 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 Division 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 minimum information is required before a chemical can be included in the "approved" list:

- Composition
- Modified NFPA Code (Health, Fire, Reactivity)
- DOT classification
- Special Hazard Code (C=Carcinogen; SC-Suspected Carcinogen; SEN=Sensitizer; CHR-Chronic Hazard; SKIN=Skin Hazard)
- Storage Code (to be developed)
- Disposal Code (to be developed)
- Chemical Abstract Registry Number received by the Plant Purchasing Department
- TOSCA Candidate List Code
- First Aid Information
- Special Fire Fighting Procedures

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- b. The "control point" for the programs must be the shared responsibility of the purchasing organization and the product standards group. An up-to-date list of chemicals approved for purchasing will be provided by the Division Industrial Hygienist for the Division Purchasing Groups (within Supply and Distribution) and each facility Purchasing Department, Safety Supervisor, Laboratory Superintendent and Health Chemist. 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 submit Purchase Orders to the Division Industrial Hygienist for approval.
 - 2.) Facility purchasing departments will send Purchase Orders to the Laboratory Superintendent for approval.
- d. The Division Industrial Hygienist or the Laboratory Superintendent will take the following action:
 - 1.) Request from supplier a completed Material Safety Data Sheet (MSDS) and other information needed to complete Chemical Data Form. (The assistance of purchasing groups should 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 official form.
 - 2.) Complete the Chemical Data Form (Attachment A).
 - 3.) Evaluate the data.
 - 4.) Consult as required with safety, medical and technical functions.

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- 5.) Materials adjudged "non-hazardous" will be approved immediately with no further action required.
- 6.) If the material is a generic chemical and presents no unusual safety or health hazard (such as a contact allergen or a suspect carcinogen), a MSDS will be requested or prepared; the Chemical Data Form completed and entered in the data system, and the name of the chemical entered on the Approved List by the Division Industrial Hygienist.
- 7.) If the material is a new trade name chemical, the supplier must be contacted to ascertain its chemical composition and hazard potential.
- 8.) Copies of all approved Purchase Orders for new chemicals and materials will be submitted to the Division Industrial Hygienist to be included on the Approved List and to facilitate follow-up with the ordering facility to assure that the chemical will be handled safely. An informational copy will be submitted to the Safety Supervisor of the ordering facility. Copies of the completed MSDS must be submitted to the Division Industrial Hygienist, Facility Laboratory Superintendent, Facility Safety Supervisor, and the ordering department.

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ATTACHMENT A

CHEMICAL DATA FILE*

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
11. TOSCA Information
 - a. Chemical Abstracts Registry Number
 - b. Candidate List Code Number
 - c. Estimated Consumption in Current Calendar Year if Known

* Information stored on magnetic tape and entered by Health Chemists and Division Industrial Hygienist.

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