



Shell Oil Company
Interoffice Memorandum

December 7, 1981

FROM: Industrial Hygienist
TO: See Distribution
SUBJECT: Contractor Respirator Programs

The attached guideline on Contractor Respiratory Protection Programs is provided for your information. Please note that the guideline specifically applies to those contractor employees working at DPMC and are required to use respiratory protection during planned activities. The guideline as written offers clarification and formalizes many current practices.

If you have any questions concerning this, please let me know.

A handwritten signature in cursive script that reads "P. J. Snyder".

P. J. Snyder

PJS:sdm

Attachment

749
Contractor
Safety
R

PLAINTIFF'S EXHIBIT

SH-3487

HUT - 081867

ABS-013523

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GUIDELINES FOR CONTRACTOR RESPIRATORY PROTECTION PROGRAMS AT DPMC

PREAMBLE

The following guideline outlines the general requirements for contractor performance in establishing acceptable respirator programs. To assist contractors in fulfilling this obligation, Shell will make available certain technical resources as outlined below. It is the intent of Shell Management however, that each contractor retain responsibility for program development and compliance with applicable Health and Safety Standards.

Scope: The requirements of this guideline apply to only those contractors who have an anticipated (planned) use of respiratory protection at the Shell Deer Park Manufacturing Complex.

1. GENERAL

All contractors working at Shell DPMC are to comply with applicable OSHA regulations including 29 CFR 1910.134, Respiratory Protection.

Where respiratory protection is required, respiratory programs which comply with the above regulation generally include:

Employee Training

- . Potential Health Hazards of Exposure
- . Proper Respirator Selection

Proper Respirator Selection

- . Air-Supplied vs. Dust Mask vs. Full-Face Air-Purifying Respirators

Determinations of Medical Suitability to Use Respiratory Protection

Proper Respirator Maintenance

- . Cleaning
- . Inspection

Qualitative or Quantitative Fit Testing of Air-Purifying Respirators

- . Removal of Facial Hair in the Respirator Sealing Surface

Responsibility for contractor employee protection and OSHA compliance rests with the management of the contractor. To assist the contractor to meet these obligations, Shell will make available to the contractor certain equipment and manpower resources. Regardless of the contractors utilization of these Shell resources, all contractors required to use respiratory protection at DPMC will be expected to have in place an acceptable respirator program.

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2. AVAILABILITY OF RESPIRATORY PROTECTION EQUIPMENT

With the exception of paint contractors engaged in sandblasting, Shell will make respiratory protective equipment available to all contractors. Sandblasters are to provide their own air-supplied hoods and other protective gear required for this work.

Special respiratory protection required because of process related factors (e.g. potential exposure to chemicals being handled within a unit) will be supplied by DPMC to sandblasters.

DPMC will supply cartridges, air-purifying masks, air-line respirators and other appropriate respiratory protective equipment through the Central Respirator Center or satellite cabinet system. Respirator maintenance for equipment used by contractors will be equivalent to that provided Shell's employees.

DPMC will supply the required respiratory protective equipment needs of contractors during turnarounds.

Construction contractors including capital and purchase order contractor needs will be reviewed by Industrial Hygiene and Engineering on a case-by-case basis. This applies to lead burner work and tank cleaning.

3. RESPIRATORY TRAINING - DPMC

Safety and Industrial Hygiene will make available to all maintenance contractors a qualified trainer to train one of their supervisory personnel who will be responsible for training the contractors' personnel. Acceptance of this offer by contractors is on a voluntary basis. Records of this training will be retained by the Safety Representative - Contractors.

The Safety Representative - Contractors and the DPMC Shell Maintenance organization retain the right to periodically audit the respirator training provided to employees of Shell contractors.

Construction contractors will normally not be required to use respirators to install new facilities. In the event of a chemical release, the proper response for these contractors is evacuation to a safe area. Where respiratory protection is to be used during a project, the employees engaged in this work are to receive the required training by their employer.

Short-term maintenance work requiring the use of respiratory protection such as tank cleaning will be required to verify that the required training has been completed prior to initiating work.

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4. QUANTITATIVE FIT TESTING

For contractors utilizing Shell air-purifying respirators, Shell will make available fit testing equipment and a qualified technician to conduct fit testing. Contractor fit testing is to be conducted with the type of mask used by Shell personnel (Scott and MSA).

Contractor fit testing is to be held once per year to pick up new employees and retest old employees. This frequency may be adjusted to accomodate Shell needs and to reflect changes in testing requirements.

Shell is to provide a copy of our general fit test procedure and testing criteria to the management of each contractor. They are to accept in writing or provide their own testing criteria.

During contractor fit testing, an appropriate representative from the contractor is to be present to maintain records and supervise the testing activity.

PJS/gri
11-19-81

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