

March 15, 1991

CONTRACTOR SAFETY

The use of contractors by Hoechst Celanese is critical to the successful operation of our facilities. Some recent tragic events in the U.S. have highlighted the issues of contractor training and safety.

We at Hoechst Celanese are committed to providing the safest possible environment for our employees and neighbors. We must make certain that everyone who works on our sites meets our standards in every respect. It is our way of doing business because it is the right thing to do.

The attached recommendations have been developed by a QAT and have been approved by the Law and EHSA Departments. Please give their implementation your immediate attention.

C. E. Steel



Vice President, Administration

Attachments

COPY

Interoffice Memo

Hoechst Celanese

Date February 21, 1991

Reference Number: 90-524

To EH&S Directors/Facility Managers

From Contractor Safety QAT

Dept Location

Dept/Location

Subject CONTRACTOR SAFETY - RECOMMENDATIONS OF QAT

In the past Hoechst Celanese has communicated to contractors it's expectations regarding environmental, health and safety, and has expected that these requirements would be fulfilled. Traditionally, Hoechst Celanese has attempted to accomplish this without assuming a supervisory role with contractors that could be interpreted as co-employment. The events referred to above, as well as OSHA's proposed process safety management regulation, require us to quickly examine our contractor relationships.

There are several documents available, for your background information (see attachments), regarding the contractor safety/co-employment subject. This compendium of information will help you understand the importance that this issue has assumed, and therefore, the urgent need to clarify our contractor philosophy.

In no case can process, employee or community safety be jeopardized. Safety is of utmost importance and must not be overridden by co-employment concerns. With appropriate planning co-employment and safety issues need not be inconsistent.

You may previously have received the QAT's "interium" recommendations. The final recommendations, which follow are not significantly different but are presented in hardback form for retention and are worded (we hope) more clearly in a few instances. We have updated the Summary of Legislative Activities and provided a "model" contract for your use. The underlining in the contract indicates changes.

We have used internal and external experts as well as our contractors in the development of these recommendations and believe they are consistent with Hoechst Celanese's philosophy to do what is right. Please contact your ESHA representative or the corporate ESHA department if you have questions.

Hoechst 

HNA SH STEW 7547

CONTRACTOR ENVIRONMENTAL, HEALTH AND SAFETY
RECOMMENDATIONS

1. THE SAFETY OF ALL PERSONNEL AND FACILITIES, AND THE PROTECTION OF THE ENVIRONMENT IS OF UTMOST IMPORTANCE AND MUST NOT BE OVERRIDDEN BY CO-EMPLOYMENT CONCERNS.
2. MAINTAIN FREQUENT DISCUSSIONS, MEETINGS OR OTHER FORMS OF COMMUNICATION WITH CONTRACTOR MANAGEMENT FOCUSING ON EH&S REQUIREMENTS, EXPECTATIONS AND PERFORMANCE.
3. EXAMINE CONTRACTOR SAFETY AND ENVIRONMENTAL RECORDS (OSHA 200 LOGS CONTRACTOR ACCIDENT INVESTIGATIONS REPORTS, OTHER ACCIDENT RECORDS) TO INCREASE HCC FAMILIARITY AND KNOWLEDGE OF CONTRACTOR SAFETY, HEALTH AND ENVIRONMENTAL PERFORMANCE.

4. EXAMINE CURRENT CONTRACTS TO ENSURE THAT HCC EXPECTATIONS REGARDING EH&S ISSUES ARE APPROPRIATELY INCLUDED SUCH AS, FULL COMPLIANCE WITH ALL LAWS AND SITE EH&S POLICIES AND PROCEDURES.

- * NEGOTIATE CHANGES AS NECESSARY TO FILL GAPS USING LAW DEPARTMENT GUIDANCE.

- * CONSIDER WHETHER CURRENT CONTRACTS CAN OR SHOULD BE RENEGOTIATED TO ENSURE ADEQUATE CONTROL AND CLEAR UNDERSTANDING OF EXPECTATIONS REGARDING EH&S PRACTICES AND TRAINING.

- * ALL TERMS AND CONDITIONS THAT APPLY TO CONTRACTORS WILL APPLY TO SUBCONTRACTORS.

5. DEVELOP A STRATEGY TO ENHANCE THE PROVISION OF ENVIRONMENTAL, HEALTH AND SAFETY TRAINING ASSISTANCE TO ON-SITE CONTRACTORS.

* THE TRAINING MUST CONTINUE TO BE THE RESPONSIBILITY OF THE INDIVIDUAL CONTRACTORS, BUT COULD, WHERE REQUIRED, INCLUDE HCC SUPPORT. FOR EXAMPLE, AS INSTRUCTORS TO TRAIN THE CONTRACTOR TRAINERS IN SPECIFIC SITE SPECIFIC SAFETY, HEALTH OR ENVIRONMENTAL REQUIREMENTS.

6. ESTABLISH METHODS TO MONITOR CONTRACTOR WORK PRACTICES AND PROVIDE CONTINUING EH&S GUIDANCE TO ENSURE CONTRACTOR PRACTICES AND PROCEDURES ARE IN FULL COMPLIANCE WITH HCC EH&S POLICIES AND SITE PROCEDURES.

7. CONSIDER ALL GROUPS OF CONTRACTORS AND SUBCONTRACTORS WHEN DISCUSSING ENVIRONMENTAL, HEALTH AND SAFETY EXPECTATIONS:

- * LARGE CONTRACTORS (MAJORS E.G. - MUNDY & DANIELS).
- * LEASED EMPLOYEES.
- * SMALL CONTRACTORS.

8. MAINTAIN CO-EMPLOYMENT STANDARDS WITHOUT COMPROMISING ENVIRONMENTAL, HEALTH AND SAFETY. IF CO-EMPLOYMENT GUIDELINES PRESENT A PROBLEM, THE LAW DEPARTMENT SHOULD BE CONSULTED.

9. CONTRACTORS MUST ASSURE HOECHST CELANESE OF THE COMPETENCE OF THEIR ORGANIZATION AND EMPLOYEES. CERTIFICATION OF SKILL LEVELS AND CONTRACTORS' ABILITIES TO SATISFY HCC EH&S REQUIREMENTS ARE BOTH REQUIRED. EXISTING CERTIFICATION MECHANISMS PROVIDED THROUGH TRADE ASSOCIATIONS AND CODE TESTING CAN BE UTILIZED IN MEETING THESE REQUIREMENTS. ~~HCC WILL NEED TO ESTABLISH CERTIFICATION METHODS TO ASSURE CERTIFICATION IN SOME AREAS, ESPECIALLY EH&S RESPONSIBILITIES.~~
10. WORK WITH CONTRACTORS TO ENSURE THEY SUPPORT HCC'S ENVIRONMENTAL, HEALTH AND SAFETY STANDARDS AND PROCEDURES IN A MANNER CONSISTENT WITH HCC'S VALUES.
11. CONTRACTOR SAFETY RECORDS WILL BE CONSIDERED IN THE EVALUATION OF THE SITE SAFETY PERFORMANCE.

SAFETY ORIENTATION
ACKNOWLEDGEMENT STATEMENT

I have received the appropriate safety orientation and understand the basic regulations and policies of the Hoechst Celanese Textile Fibers, Shelby Plant.

CONTRACTOR

DATE

CONTRACTOR SUPERVISOR

DATE

HOECHST CELANESE CONTACT

DATE

Please forward this form when completed to Purchasing for retention.

Shelby Plant
January, 1988

HNA SH STEW 7553